

FOX CANYON GROUNDWATER MANAGEMENT AGENCY

A STATE OF CALIFORNIA WATER AGENCY



BOARD OF DIRECTORS

Eugene F. West, Chair, *Director, Camrosa Water District*
David Borchard, Vice Chair, *Farmer, Agricultural Representative*
Steve Bennett, *Supervisor, County of Ventura*
Michael W. Mobley, *Director, United Water Conservation District*
Tony Trembley, *Councilperson, City of Camarillo*

EXECUTIVE OFFICER

Jeff Pratt, P.E.

NOTICE OF MEETING

NOTICE IS HEREBY GIVEN that the Fox Canyon Groundwater Management Agency (FCGMA) will hold a **VideoConference Executive Committee Special Meeting at 2:00 p.m. on Monday, August 10, 2020.**

IN ACCORDANCE WITH THE CALIFORNIA GOVERNOR'S EXECUTIVE STAY AT HOME ORDER AND THE COUNTY OF VENTURA HEALTH OFFICER DECLARED LOCAL HEALTH EMERGENCY AND BE WELL AT HOME ORDER RESULTING FROM THE NOVEL CORONAVIRUS, THE HALL OF ADMINISTRATION BUILDING IS CLOSED TO THE PUBLIC. TO FIND OUT HOW YOU MAY ELECTRONICALLY ATTEND THE MEETING AND PROVIDE PUBLIC COMMENT PLEASE REFER TO "NOTICES" ON PAGE 2 OF THIS AGENDA

FCGMA EXECUTIVE COMMITTEE SPECIAL MEETING AGENDA

August 10, 2020

Members: Chair Eugene F. West
Vice Chair David Borchard

- A. Call to Order**
- B. Introductions**
- C. Public Comment** – Audience members may speak about FCGMA-related matters not on today's Agenda.
- D. Approval of Minutes** – Approve the minutes of the June 10, 2020 Executive Committee special meeting.
- E. Approval of Minutes** – Approve the minutes of the July 8, 2020 Executive Committee special meeting.
- F. Proposed Extraction Allocation Ordinance for the Las Posas Valley Basin** – Discuss specific provisions of the proposed interim allocation ordinance for the Las Posas Valley Basin and provide recommendations for consideration at the August 14, 2020, Board meeting first reading of the proposed ordinance.
- G. Future Agenda Items and Next Meeting Date**
- H. Adjourn the Executive Committee Meeting**

NOTICES

*The following information is provided to help you understand, follow, and participate in the meeting:
Public Comments – Public comment is the opportunity for members of the public to participate in meetings by addressing one or more agenda or non-agenda items.*

The following options allow for public participation:

1. Join the Zoom Meeting as an Attendee

Please click the link below to join the webinar:

<https://us02web.zoom.us/j/82697619667?pwd=blqvdmJJNEFISHJ0c3pZdlNwaXFkQT09>

Password: 392258

With this option you will be able to raise your hand, and the Clerk of the Board will give you speaking abilities to make a public comment.

2. Call-In to listen to the meeting:

Telephone: 1 669 900 6833

Conference ID: 826 9761 9667

Password: 392258

Options 2 will not allow you to make direct speaking comments. If you wish to make a comment please follow the steps below.

2. If you wish to make a comment please submit your comment to the Clerk of the Board at fcgma@ventura.org. Please indicate in the Subject Line, the Agenda item number (e.g., Item No. 9). Your email will be read and placed into the record.

The FCGMA Board strives to conduct accessible, orderly, and fair meetings where everyone can be heard on the issues. The Board Chair will conduct the meeting and establish appropriate rules and time limitations for each item. The Board can only act on items designated as Action Items. Action items on the agenda are staff proposals and may be modified by the Board as a result of public comment or Board member input. Additional information about Board meeting procedures is included after the last agenda item.

Administrative Record: *Material presented as part of testimony will be made part of the Agency's record, and 10 copies should be left with the Board Clerk. This includes any photographs, slides, charts, diagrams, etc.*

ADA Accommodations: *Persons who require accommodation for any audio, visual, or other disability in order to review an agenda or to participate in the Board of Directors meeting per the Americans with Disabilities Act (ADA), may request such accommodation in writing addressed to the Clerk of the FCGMA Board, 800 So. Victoria Avenue, Location #1610, Ventura, CA 93009-1610, or via telephone by calling (805) 654-2014. Any such request should be made at least 48 hours prior to the meeting so staff can make the necessary arrangements.*

Availability of Complete Agenda Package: *A copy of the complete agenda package is available for examination at the FCGMA office during regular working hours (8:00 a.m. to 5:00 p.m. Monday through Friday) beginning Three days before the Board meeting. Agenda packet contents are also posted on the FCGMA website as soon as possible, and left there for archival retrieval in case reference is needed on previously considered matters. Questions about specific items on the agenda should be directed to the Agency's Executive Officer.*

Continuance of Items: *The Board will endeavor to consider all matters listed on this agenda. However, time may not allow the Board to hear all matters listed. Matters not heard at this meeting may be carried over to the next Board*

meeting or to a future Board meeting. Participating individuals or parties will be notified of the rescheduling of their item prior to the meeting. Please contact the FCGMA staff to find out about rescheduled items.

Electronic Information and Updates: Our web site address is <http://www.fcgma.org>. Information available online includes the Board's meeting schedule, a list of the Board members and staff, general information, and various Agency forms. If you would like to speak to a staff member, please contact the FCGMA Clerk of the Board at (805) 654-2014.

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EXECUTIVE OFFICER

Jeff Pratt, P.E.

MINUTES

Minutes of the Fox Canyon Groundwater Management Agency's (FCGMA) **Videoconference** Executive Committee Special Meeting held **Wednesday, June 10, 2020** in Conference Room 341 of the Hall of Administration, Third Floor, Ventura, CA 93009.

A. Call to Order

Chair West called the meeting to order at 10:30 a.m.

B. Introductions

In attendance were: (1) Eugene West, Chair; (2) David Borchard, Vice Chair; (3) Kim Loeb, FCGMA; (4) Keely Royas, FCGMA; (5) Arne Anselm, FCGMA; (6) Glenn Shephard, WPD; (7) Frank Brommenschenkel; (8) E.J. Remson, The Nature Conservancy (TNC); (9) John Lindquist, United Water Conservation District (UWCD); (10) Jurgen Gramckow, Southland Sod; (11) Dan Detmer, UWCD; (12) John Lindquist, UWCD; (13) David Scholle; (14) Edgar Terry, Terry Farms; (15) John Grether, Grether Farms; (16) Omar Castro, City of Oxnard; (17) Peter Goldenring, Attorney; (18) Thien Ng, City of Oxnard; (19) Peter Quinlan, Dudek.

C. Public Comments

There were no public comments.

D. Approval of Minutes – May 14, 2020

Chair West made a motion to approve the May 14, 2020 minutes. Vice Chair Borchard seconded the motion, and the motion was approved.

E. OPV Variance Review Committee

Kim Loeb Introduced the item and stated that the Agency sent emails and posted a solicitation for the Variance Review Committee members. He said that they received seven applications and listed each applicant. He said that they represent different sectors, different basins, large cities, smaller cities, large farming to small farming.

Vice Chair Borchard stated that it was lucky that they received a good sampling of seven members.

Chair West thanked the applicants and said he was impressed by the numbers and names. He stated that he agrees with having seven members and has no hesitation for recommendation to the Board.

Vice Chair Borchard said that he agreed with Chair West.

Chair West said that he had a few other recommendations regarding the Variance Review Committee that he will bring to the full Board. He recommended a 12-month term, and that the committee reports its recommendation in writing to the Board no later than 60 days after the request goes to the committee for consideration.

F. Future Agenda Items and Next Meeting Date

The Board members discussed having a meeting the following month to discuss the civil penalty structure.

G. Adjourn the Executive Committee Meeting

Chair West adjourned the Executive Committee meeting at 10:47 a.m.

Submitted by:

Keely Royas
Clerk of the Board

DRAFT

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Jeff Pratt, P.E.

MINUTES

Minutes of the Fox Canyon Groundwater Management Agency's (FCGMA) Executive Committee Meeting held **Wednesday, July 8, 2020** in the **Board of Supervisor's Hearing Room**, and **Video Conference Via Zoom** in the Hall of Administration, Main Plaza Level, Ventura, CA 93009.

A. Call to Order

Chair West called the meeting to order at 2:01 p.m.

B. Introductions

Attendees in-person were: (1) Eugene West, Chair; (2) David Borchard, Vice Chair; (3) Kim Loeb, FCGMA; (4) Keely Royas, FCGMA; (5) Kathleen Riedel, FCGMA; (6) Greg Lewis, Duda Farms; (7) Michael Diacos, Self; (8) Martin Gramckow, Southland Sod; (9) Jurgen Gramckow, Southland Sod; (10) Terri Ferro, Seacoast Assoc.

C. Public Comments

There were no public comments.

D. Initial Report on Applications Requesting Allocation Variances in the OPV Basins

Kim Loeb introduced the item and went over the amount and types of applications received.

Chair West asked if the additional amount of allocation most applicants asked for was an increase to their past pumping average or a new additional allocation.

Mr. Loeb said most were an increase for their past pumping average.

E. Review of New Pumping Allocation System Variance Request Process and Penalties for the OPV Basins

Kim Loeb introduced the item and went through the process summary for the applications. He went through the efforts that the Agency had done in the past to notify and bring accounts into compliance. He went over a quick review of the variance policies from the OPV Allocation Ordinance and the associated penalty fee structure adopted by the Board. He did say that the Board has the power to grant appeals due to extenuating circumstances. He also went over the penalties for the 15 applications with no reporting requesting to bring their accounts in compliance.

Chair West said that at the time the fee schedule was adopted, the Board didn't know how it would impact the community. He said it is helpful to see now that the applications were in.

Chair West said that there have been three categories of opinions regarding the penalties:

1. Penalties are too high
2. Supportive of reduced penalties if applied
3. One Pumper expressed penalties too low

He asked Mr. Loeb if there was a timeline for the process. Mr. Loeb said that he did not have a timeline yet, but that staff was prioritizing by order received and complexity.

Vice Chair Borchard said that the fees do not seem reasonable if the Agency cannot find proof that Notice of Violations were sent to pumpers

Public comments were made by:

(1) Greg Lewis, Duda Farms; (2) Martin Gramckow, Southland Sod; (3) Beverly Gutierrez, hvwonline.com; (4) James Dubois, Self; (5) Alden Broome, Broome Ranches; (6) Doug Circle, Self; (7) Luis Calderon, Reiter Bros; (8) Jason Tamai, Self; (9) Jurgen Gramckow, Southland Sod.

Chair West said that he was shocked by the accounts with eight, nine, and 10 years of non-reporting. He asked if there should be a maximum penalty.

Vice Chair Borchard said that he was not opposed to that idea and that anything that lightens his burden would be good. He said that it would be a good incentive to do a correction of the data.

Chair West said that they could be handled on a case-by-case basis.

Vice Chair Borchard said that he was concerned that owners were not receiving notice on non-compliance.

Chair West stated that at this point there would not be any changes to the ordinance and that with more data they could make changes after the variances run their course. He said that at the next Board meeting he would like to hear more about timing, processing, and different types of requests.

(1) Future Agenda Items and Next Meeting Date

Chair West stated that he is not sure if another meeting will be needed.

(2) Adjourn the Executive Committee Meeting

Chair West adjourned the Executive Committee meeting at 3:47 p.m.

Submitted by:

Keely Royas
Clerk of the Board

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MINUTES

Minutes of the Fox Canyon Groundwater Management Agency's (FCGMA) Executive Committee Meeting held **Wednesday, August 10, 2020** in the **Board of Supervisor's Hearing Room**, and **Video Conference Via Zoom** in the Hall of Administration, Main Plaza Level, Ventura, CA 93009.

A. Call to Order

Chair West called the meeting to order at 2:01 p.m.

B. Introductions

Attendees were: (1) Eugene West, Chair; (2) David Borchard, Vice Chair; (3) Kim Loeb, FCGMA; (4) Keely Royas, FCGMA; (5) Kathleen Riedel, FCGMA.

C. Public Comment

There were no public comments.

D. Approval of Minutes – June 10, 2020

E. Approval of Minutes – July 8, 2020

Vice Chair Borchard recommended approval of the minutes. Chair West agreed, and the minutes were approved.

F. Proposed Extraction Allocation Ordinance for the Las Posas Valley Basin

Kim Loeb presented an overview of some policy issues with the proposed Las Posas Valley Basin Extraction Allocation Ordinance. The items discussed were the Epworth Gravels management area, initial allocation, minimum allocation, and CombCodes in more than one management area.

Chair West asked if there are many accounts that fall below the range of what the minimum allocations might be. Mr. Loeb stated that it is hard to say as individual acreage is not known.

Chair West said that he wondered if minimum allocations at this stage are more academic, not practical.

Chair West asked for that public comments be broken down into the different discussion items, starting with the Epworth Gravel.

Public Comments were heard by:

Epworth Gravels:

(1) Rob Saperstein, Attorney; (2) Derek Knobel, Leavens Ranches.

Initial Allocation:

(1) Peter Goldenring, Attorney; (2) Neal Maguire, Self; (3) Derek Knobel, Leavens Ranches; (4) Alma Quezada, Zone Mutual Water Company (Zone); (5) John Orr, Del Norte Water Company; (6) John Grether, Self; (7) Donlon Ranch; (8) Rob Saperstein, Attorney.

CombCodes in more than one Management Area:

No comments.

Chair West suggested that he and Vice Chair Borchard provide feedback on each item individually.

Epworth Gravels:

Vice Chair Borchard stated that he thinks the Epworth Gravels deserves to be managed separately from the East Las Posas if it is truly different hydrologically. Chair West stated that he thinks that staff has done a good job of sticking to the way the White Paper lays out the Epworth Gravels, but he agrees with comments suggesting that it be treated as a separate group of pumpers within the East Las Posas Management Area. Chair Borchard agreed.

Initial Allocations:

Vice Chair Borchard stated that he is confused on comments that 36,000-acre feet (AF) being the end point of the allocations. Chair West said that there would be no cutbacks on day one and that the allocations would start close to what pumping is now. Vice Chair Borchard and Chair West agreed that the starting number is on the high side. Chair West stated that the Board needs to honor that they said there would be no cutbacks on day one and that initial allocations might need to be raised to do that. Vice Chair Borchard agreed.

Chair West asked how close staff was at having any missing wells or wells in the wrong management area finalized. Kim Loeb said that he thinks it is finalized.

Minimum Allocations:

Chair West stated that his recommendation to the full Board would be to increase the initial allocation pool from the 36,000 AF on the spreadsheet to 39,000 through 40,000 AF. Vice Chair Borchard agreed.

Chair West said that if the initial allocation pools are set high enough, the minimum allocation issue might not occur until the allocations start ramping down. It would also allow time to gather more accurate data to rely on or setting the minimum allocations.

Chair West stated that doing an independent study of what growers need to remain in production could be done to establish the minimum allocation. He said that the current data doesn't support setting an accurate minimum allocation, but if the initial allocations are set high enough, he is not sure the data is needed yet.

Vice Chair Borchard said that if you take the usage numbers from certain growers that have been reporting, you could get an average.

Chair West said that for this version of the ordinance, the part of minimum allocations could be redacted or changed to indicate it is a work in progress. Vice Chair Borchard agreed.

CombCodes in More Than One Management Areas:

Chair West stated that he doesn't know how wide a problem it is or how many CombCodes fall into the category, but he isn't sure that one year is enough time to balance the pumping. He would like more feedback from the pumpers.

Vice Chair Borchard asked Mr. Loeb to look at the section of the ordinance pertaining to the reserve allocation pools and make sure it lines up with what was suggested in the White Paper.

Chair West asked where the variance process was for the Oxnard and Pleasant Valley Basins.

Mr. Loeb answered that staff's attention had to shift to complete the Las Posas effort. He stated that staff will work as diligently as possible to complete what they can, but it will not be by October 1, 2020.

Vice Chair Borchard stated that the Board should consider a relaxation policy on civil penalties for accounts that try to be in compliance.

G. Future Agenda Items and Next Meeting Date

Chair West stated that he is not sure if another meeting will be needed.

H. Adjourn the Executive Committee Meeting

Chair West adjourned the Executive Committee meeting at 4:21 p.m.

Submitted by:

Keely Royas
Clerk of the Board

FCGMA Executive Committee Special Meeting

August 10, 2020



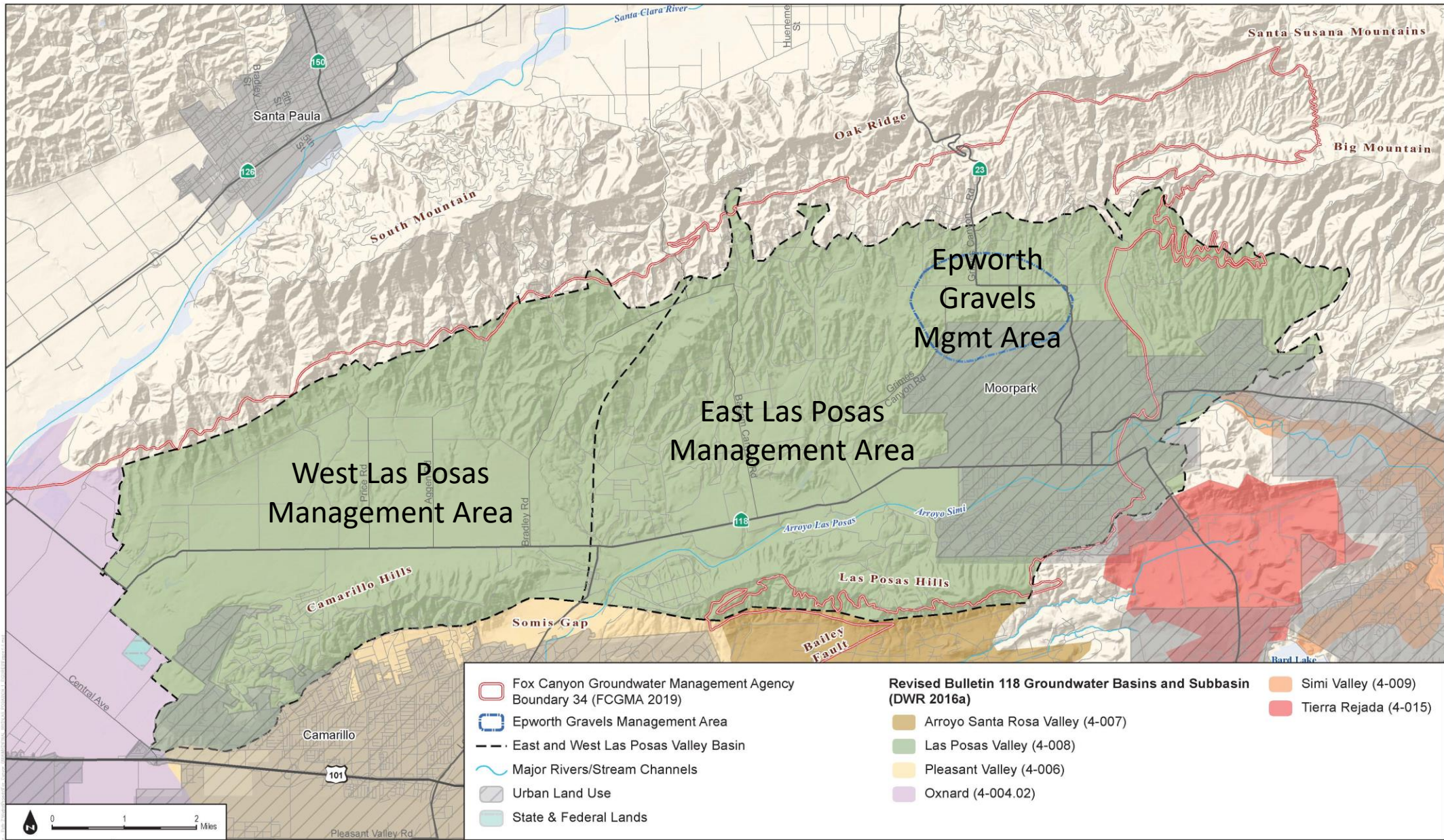
F. Proposed Extraction Allocation Ordinance for the Las Posas Valley Basin

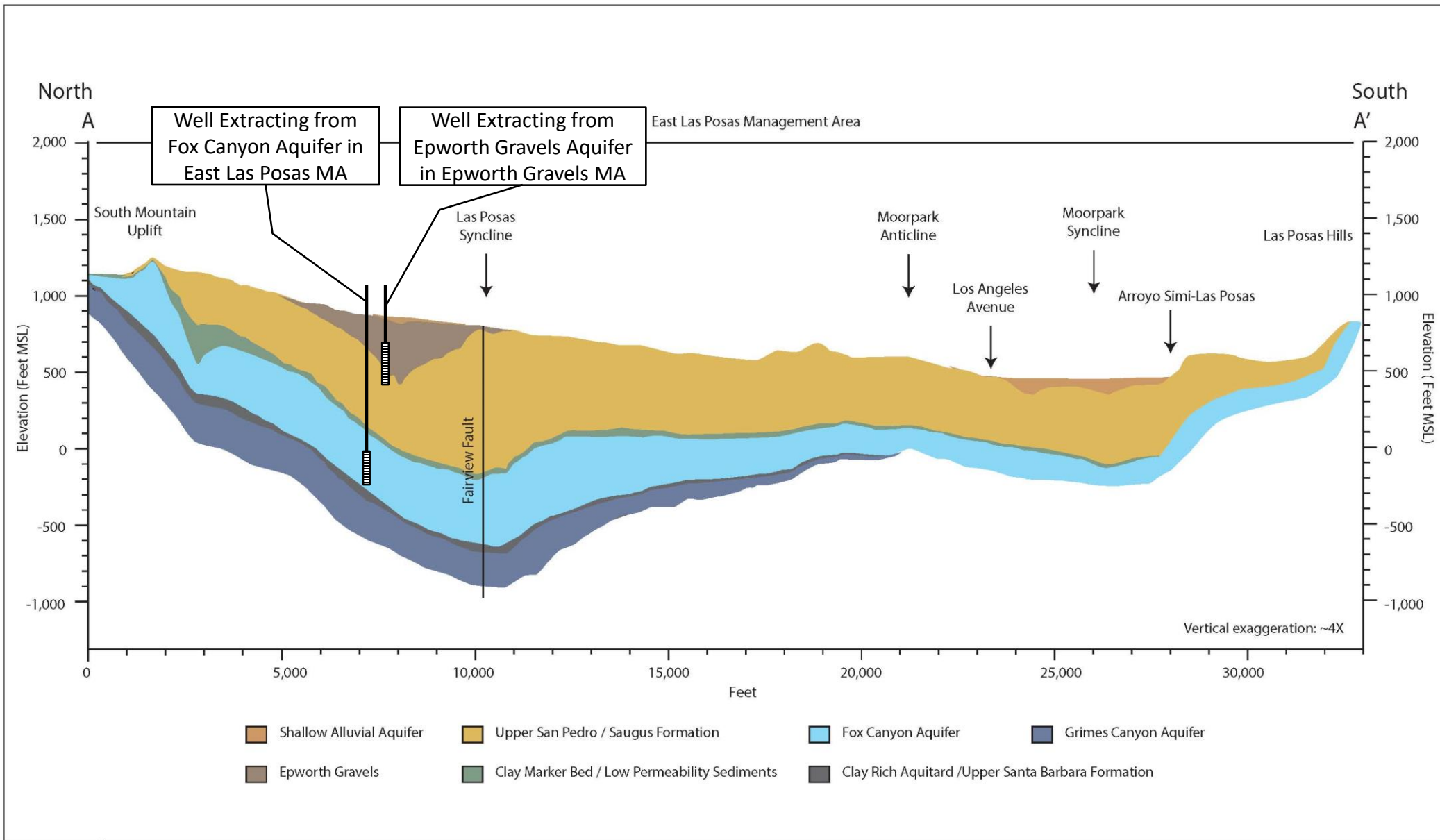
Issues for Discussion

- Epworth Gravels Management Area
- Initial Allocations
- Minimum Allocations
- CombCodes in more than one management area

Epworth Gravels Management Area

- Defined vertically by the Epworth Gravels Aquifer, which is hydraulically disconnected from underlying Fox Canyon Aquifer
- Lies within the East Las Posas Management Area
- Lands are irrigated by wells in both the Epworth Gravels Aquifer and the underlying Fox Canyon Aquifer
- There are 6 active wells and 4 operators in EGMA





SOURCE: CMWD 2016a

DUDEK

Groundwater Sustainability Plan for the Las Posas Valley Basin

FIGURE 2-3
Conceptual Cross Section A-A'

Management Area Pools

- Allocation in the **East Las Posas Management Area** divided into two pools:
 - **Pool 1:** All operators extracting in the ELPMA except Ventura Co. Waterworks Districts Nos. 1 and 19 (and Epworth Gravels Mgt Area*)
 - **Pool 2:** Ventura Co. Waterworks Districts Nos. 1 and 19 (wells in ELPMA)
- Allocation in the **West Las Posas Management Area** divided into two pools:
 - **Pool 1:** All operators extracting in the WLPMA except Ventura Co. Waterworks District No. 19
 - **Pool 2:** Ventura Co. Waterworks District No. 19
- ***Epworth Gravels Management Area:** Operators extracting exclusively from the Epworth Gravels Aquifer – within but separate from ELPMA Pool 1

Initial Mgmt. Area Pool Allocations (AFY)

PRELIMINARY DRAFT

Las Posas Valley Basin

*Total** 36,000

East Las Posas Management Area (ELPMA)

*Total** 21,600 ELPMA

*Pool 2** 2,719 VCWWD Nos. 1 & 19

*Pool 1** 18,881 Non-VCWWD (includes Epworth Gravels Management Area)

670 Reserve Allocation Pool

18,211 Pool 1 net

West Las Posas Management Area (WLPMA)

*Total** 14,400 WLPMA

*Pool 2** 1,712 VCWWD No. 19

*Pool 1** 12,688 Non-VCWWD

320 Reserve Allocation Pool

12,368 Pool 1 net

*Amounts from stipulated agreement

Epworth Gravels Mgmt. Area Initial Allocation

- The Epworth Gravels Management Area allocation, as a subarea within the ELPMA, is a subset of the ELPMA Pool 1 allocation
- From the draft ordinance:

The EGMA Pool Yield Share shall be that portion of the ELPMA available yield equal to the EGMA Allocation Pool fraction of the total Base Period Extraction from the East Las Posas Management Area

Initial Allocations

Initial extraction allocations for each operator in Pool 1 (non-VCWWD) of ELPMA and WLPMA and Epworth Gravels MA is the greater of:

1. Average annual extraction during 2009 through 2013 base period*
2. Annual extraction in 2015*
3. Minimum Allocation for Pool 1 operators

This establishes the pro-rata share of each well of the total pool allocation

Note that minimum allocations for Ag operators is an acre-foot per acre amount.

Because the Agency does not know the irrigated acreage associated with any specific well, but only by the CombCode combination of wells, operators need to apply for a minimum allocation.

* Excluding extractions that incurred surcharges

Two Base Periods

- Identify highest-extraction by base period by CombCode
- Assign extractions to wells in each CombCode from that CombCode's highest base period
- Note that the sum of all highest CombCode extractions artificially higher than actual total extractions during either base period

Minimum Allocations for Ag Operators

PRELIMINARY DRAFT

Per White Paper:

Based on irrigated acres reported in 2015/14 IAI applications and total initial allocation for Ag operators¹

ELPMA²

14,915.108	Total Ag Well Initial Allocation
<u>8,756.920</u>	Total Irrigated Acres
1.703	Minimum Allocation (AF/Acre)

WLPMA

10,086.880	Total Ag Well Initial Allocation
<u>8,584.564</u>	Total Irrigated Acres
1.175	Minimum Allocation (AF/Acre)

White Paper:

Calculated for each management areas [sic] as the agricultural well owners'/operators' [Ag portion of Pool 1] share of sustainable yield divided by total irrigated acreage

2014/2015 FCGMA IAI reported acreage is the proposed basis for establishing irrigated acres

Notes

¹ Does not include initial allocation for Ag operators that did not file 2014/15 IAI application

² Does not include Epworth Gravels Management Area

Min Allocations for Ag Operators (cont.)

- Numerator and denominator should be based on corresponding data
- Not all 2015 ag operators reporting extractions filed 2014/2015 IAI applications listing irrigated acres
- For the preliminary draft calculation, staff included only Ag operator extractions with corresponding irrigated acres
- Would be more appropriate to base analysis on actual irrigated acres rather than on the 2014/2015 IAI applications, which we know to be incomplete

**Minimum Allocations
for Ag Operators**

$$\frac{2015 \text{ Ag Pumping}}{2015 \text{ Irrigated Acres}}$$

Based on operator reporting in Pool 1 by management area

Legend

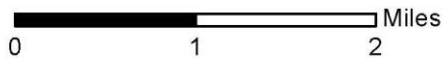
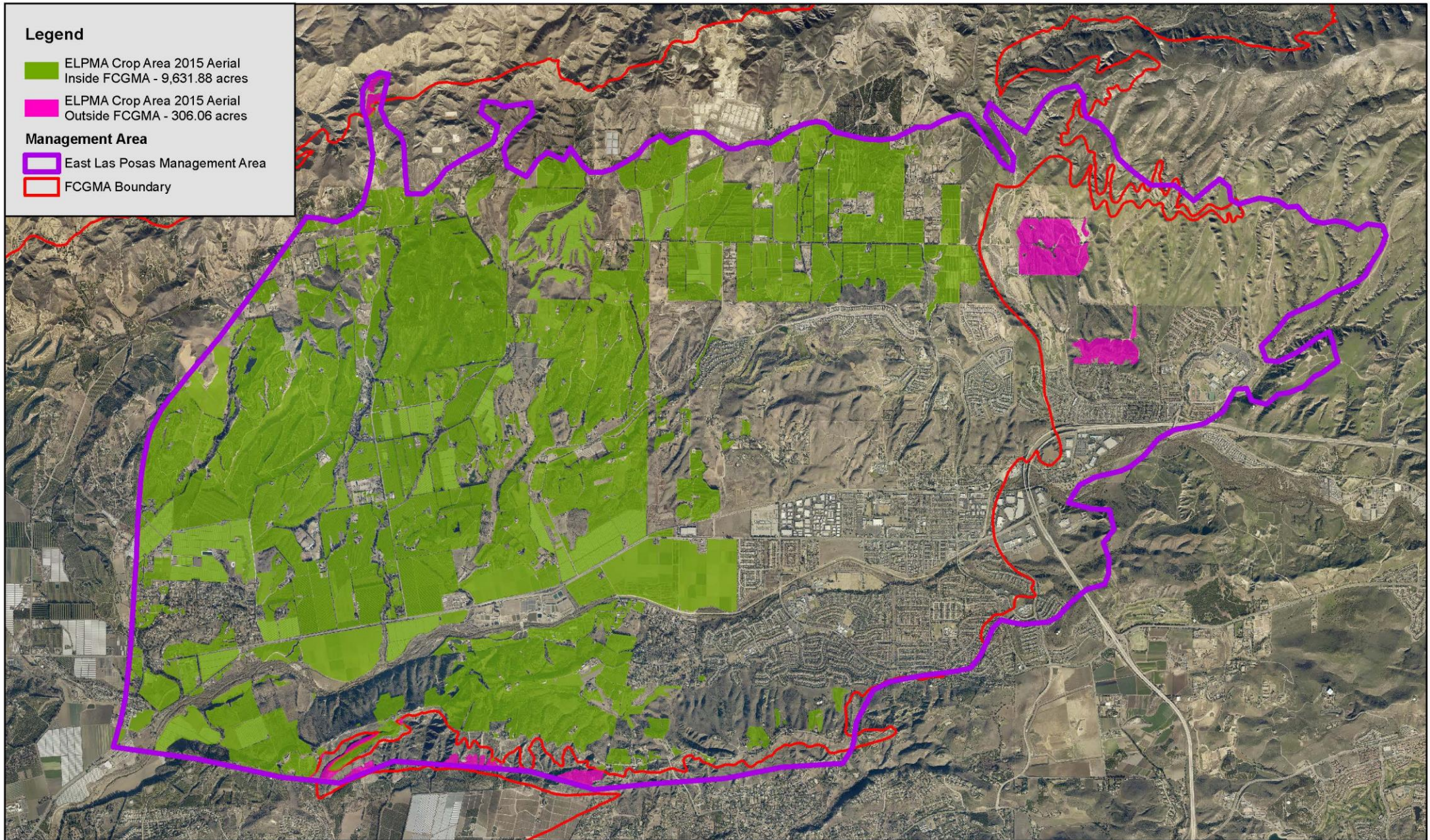
ELPMA Crop Area 2015 Aerial
Inside FCGMA - 9,631.88 acres

ELPMA Crop Area 2015 Aerial
Outside FCGMA - 306.06 acres

Management Area

East Las Posas Management Area


FCGMA Boundary



**Crop Area Within East Las Posas Management Area
Fall 2015 Aerial**

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Legend

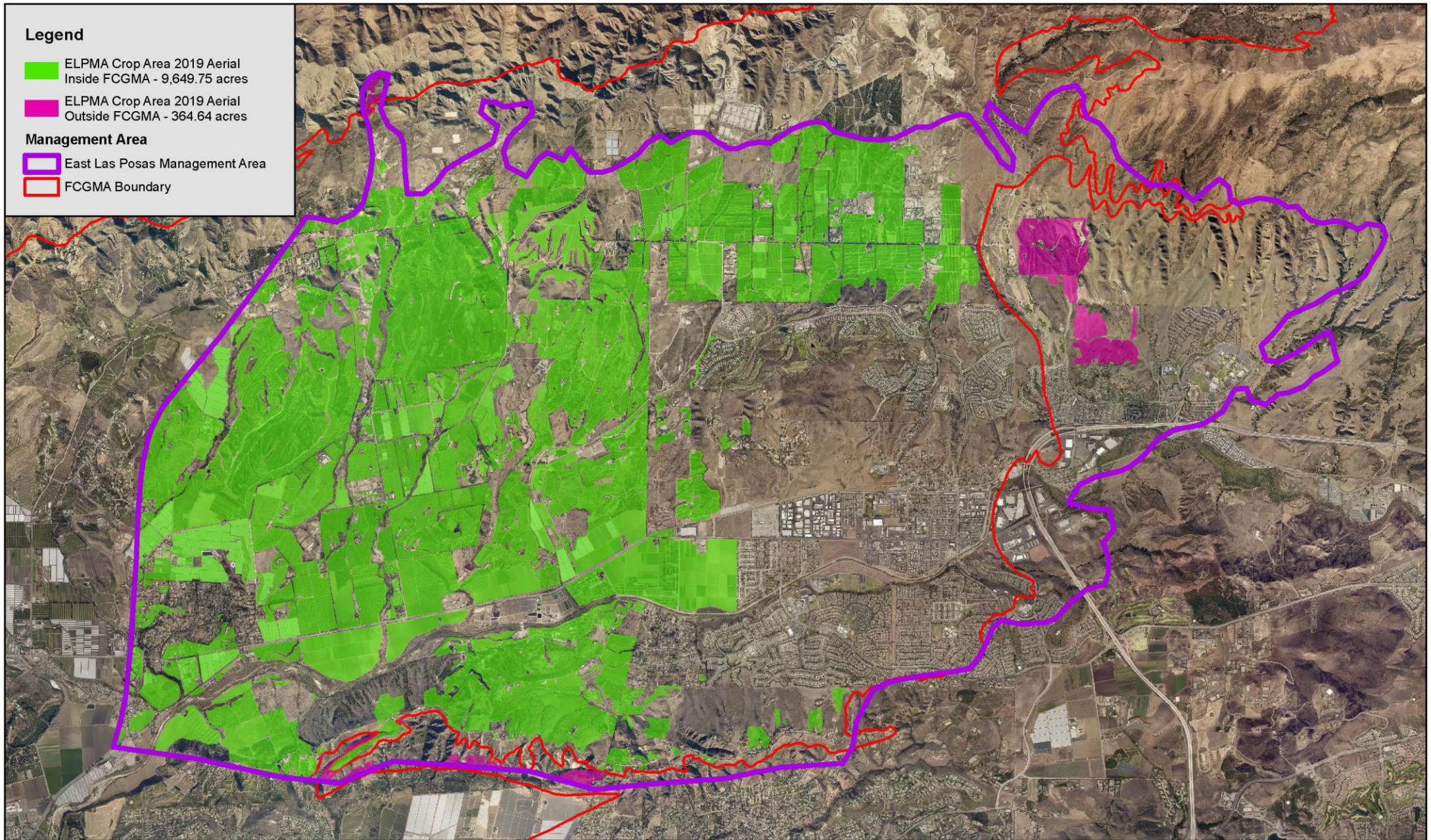
 ELPMA Crop Area 2019 Aerial
Inside FCGMA - 9,649.75 acres

 ELPMA Crop Area 2019 Aerial
Outside FCGMA - 364.64 acres

Management Area

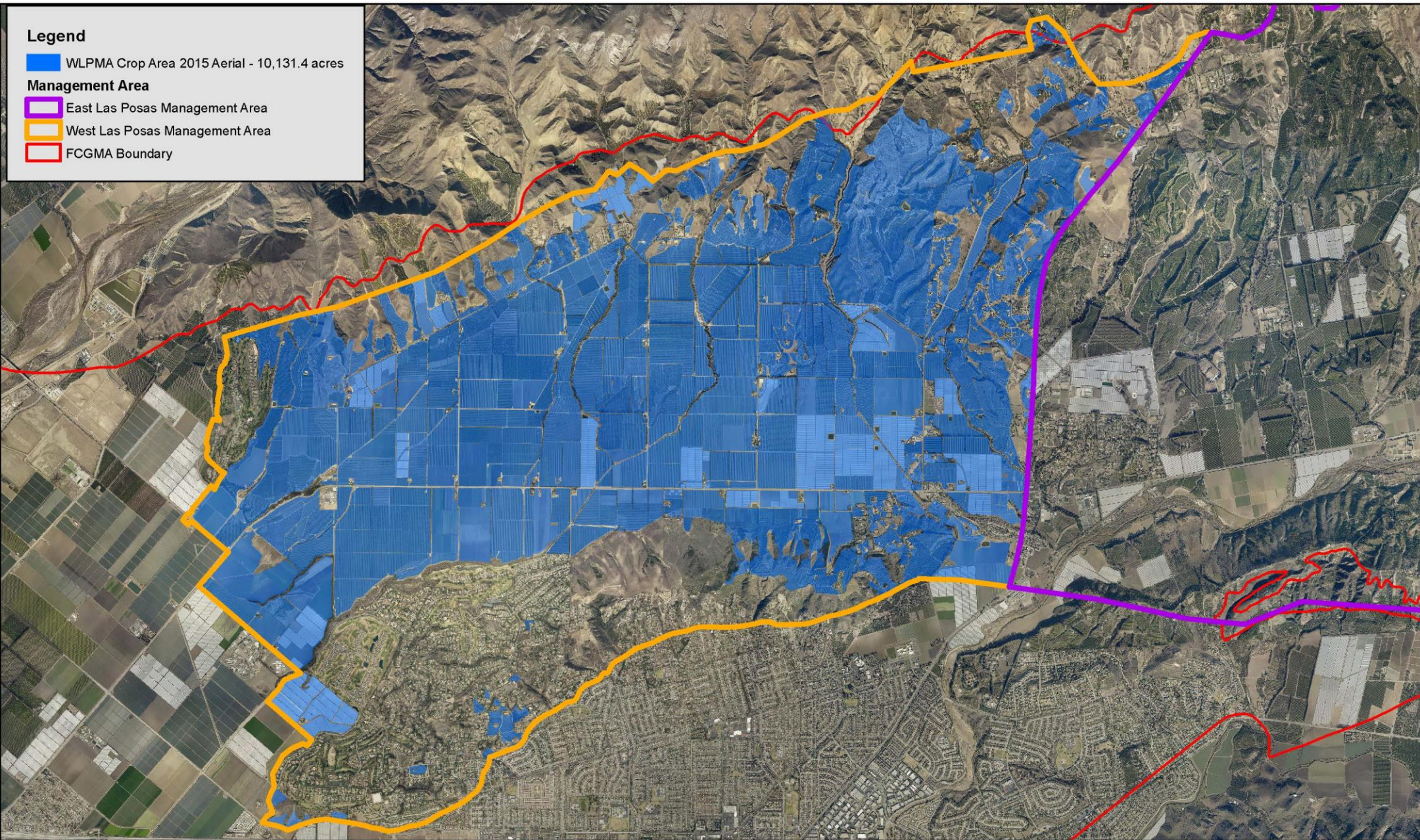
 East Las Posas Management Area

 FCGMA Boundary



**Crop Area Within East Las Posas Management Area
Fall 2019 Aerial**

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Legend

- WLPMA Crop Area 2015 Aerial - 10,131.4 acres

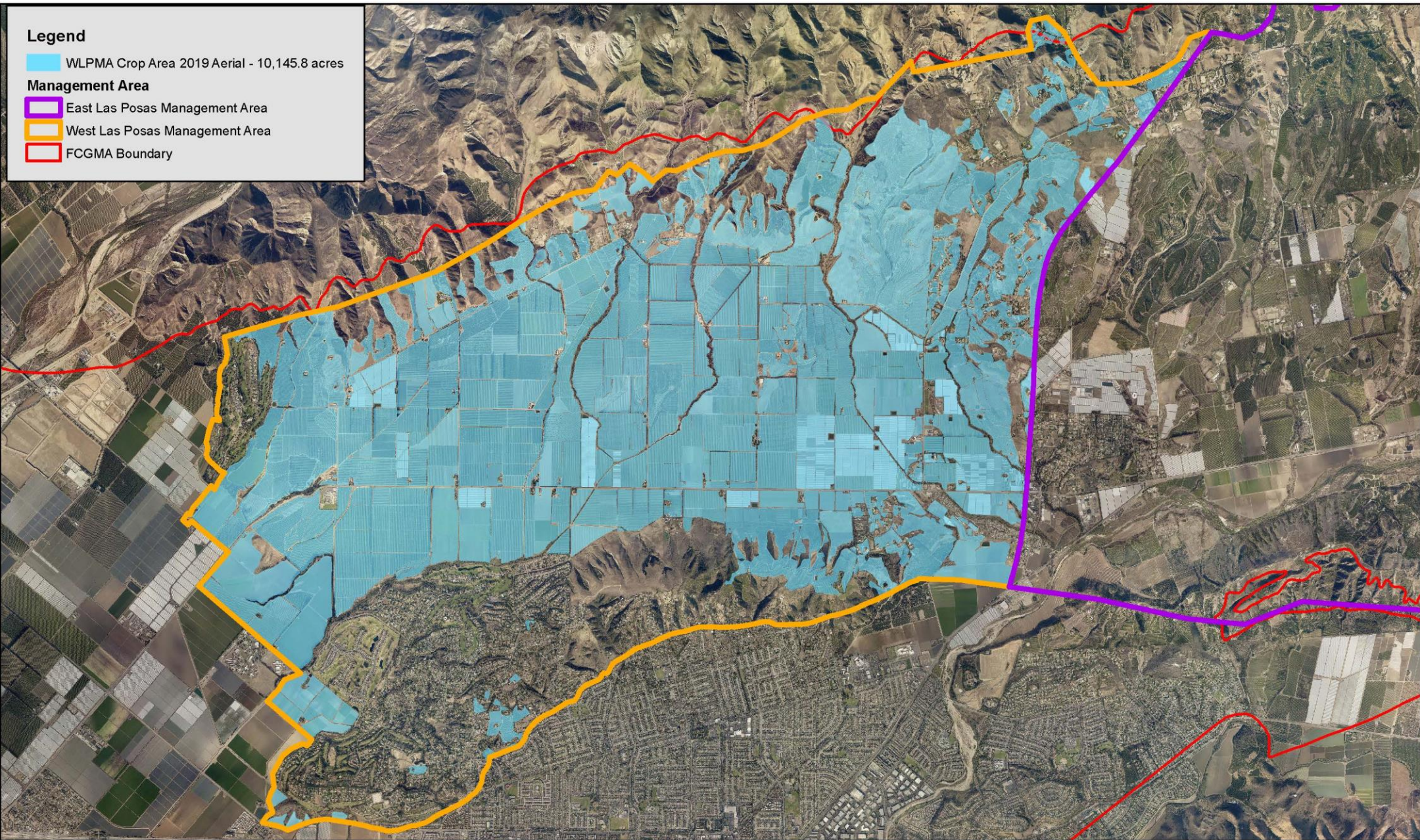
Management Area

- East Las Posas Management Area
- West Las Posas Management Area
- FCGMA Boundary



**Crop Area Within West Las Posas Management Area
Fall 2015 Aerial**

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Legend

- WLPMA Crop Area 2019 Aerial - 10,145.8 acres

Management Area

- East Las Posas Management Area
- West Las Posas Management Area
- FCGMA Boundary



**Crop Area Within West Las Posas Management Area
Dec 2019 Aerial**

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Min Allocations for Ag Operators (cont.)

- Recommend using actual irrigated acres based on 2015 or 2019 aerial photos
- Extractions based on pro-rata portion of Pool 1
Ag operator extractions in the ELPMA and WLPMA
- Options for basis of pool:
 - Stipulated agreement yield
 - GSP sustainable yield – median or lower uncertainty amount
- Issue of lands irrigated with water supplied by VCWWD (Pool 2)
- How should Epworth Gravels MA be handled?

Irrigated Acres – Initial Review Basinwide			
	2015	2019	Increase
ELPMA	9,937.94	10,020.59	82.65
WLPMA	10,131.4	10,145.8	14.4

Min Allocations – Domestic Operators

- Board expressed concern with this definition back in 2017 and there was a stakeholder comment at the 8/21 workshop
- Domestic operator minimum allocation should be applied by well and residence, not parcels
- Draft ordinance defines minimum allocations for domestic operators as:

2 acre-feet per year per well serving one to four residences

White Paper:

Domestic / Small Water Systems: 2 AFY per parcel

County Well Ordinance:

Domestic well – a water well used to supply water for the domestic needs of an individual residence or a system of four or fewer service connections

Total extraction from domestic wells in the LPVB was 32.039 AF in 2015 with average extractions of 0.923 AF

CombCodes in Multiple Mgmt. Areas

- An operator can combine multiple wells into a CombCode
- A number of existing CombCodes include wells in more than one mgmt. area
- Because each management area has a specific total allocation, wells in different mgmt. areas can no longer be grouped into a CombCode
- Exceptions need to be made on a case-by-case basis, for example Zone MWC and VCWWD No. 19 which operate wells in both the ELPMA and WLPMA that are interconnected to their distribution pipeline systems

CombCodes in Multiple Mgmt. Areas (cont.)

- Draft ordinance provisions:
 - Operator seeking to combine wells in different mgmt. areas must apply for a variance
 - Operators with extraction facilities in ore than one mgmt. area may transfer allocation between commonly operated facilities, provided that any extractions in excess of operator's allocation must be made up the following water year

Other Proposed Ordinance Provisions

- Other proposed ordinance provisions Executive Committee wishes to discuss

Exec. Committee Recommendations

- Epworth Gravels Management Area
- Initial Allocations
- Minimum Allocations
- CombCodes in more than one management area
- Other provisions