

# LAS POSAS BASIN POLICY ADVISORY COMMITTEE MEETING

## NOTICE OF MEETING - REVISED

NOTICE IS HEREBY GIVEN that the Las Posas Basin Policy Advisory Committee (PAC) will hold a **REMOTE** meeting at **2:00 P.M.** on **Thursday, January 9, 2025, VIA ZOOM ONLY:**

<https://us06web.zoom.us/j/84816327542?pwd=Y-bN4zt674FOphU6wRyxXw9swYTqvA.9bNuXf3yWWBZyrae>

Webinar ID: 848 1632 7542 | Passcode: 400774

## AGENDA

### A. Call to Order

### B. Roll Call

### C. Agenda Review

### D. Public Comments

### E. PAC Member Comments

### F. Regular Agenda

#### 1. Approve the minutes of the December 19, 2024 Regular Meeting

#### 2. Appointment of TAC member to ASR Study Group

The PAC will consider the appointment of the landowner's representative on the ASR Study Group.

*8.4.1 Participants. The Calleguas ASR Study Group shall consist of representatives, who shall be either licensed engineers with relevant Groundwater experience or certified hydrologists or similarly qualified, of the FCGMA, Calleguas, and the Landowners. It is anticipated the representatives will include equal representation of the overlying landowners and Calleguas, and a Watermaster representative.*

#### 3. Draft Basin Optimization Plan

Watermaster submitted the draft Basin Optimization Plan on December 12, 2024. The amended Watermaster Rules give the PAC 63 days from date of receipt of the draft Optimization Plan to submit Recommendation Reports to Watermaster, making the deadline February 13, 2025.

Tony Morgan, the PAC Administrator, is collecting comments from the PAC through January 13, 2025. The PAC may discuss preliminary responses to the draft document at this meeting.

#### 4. Five-Year GSP Update Watermaster Response Report

At its December 13, 2024 meeting, the FCGMA Board approved the Las Posas Valley Groundwater Sustainability Plan (GSP) five-year update. The PAC provided comments in the form of a Recommendation Report and Watermaster replied to those comments in a

Response Report. Both reports are attached here for reference. The PAC will discuss Watermaster's Response Report.

**G. PAC Subcommittee Reports**

PAC representatives on subcommittees will provide reports

- a. Operations Subcommittee
- b. Executive Subcommittee
- c. Fiscal Subcommittee
- d. TAC Subcommittee

**H. Written Communication**

None.

**I. Future Agenda Items**

The PAC will consider items for future agendas.

**J. Adjourn**

**Attachments:**

**F-1 PAC 2024-12-19 Meeting Minutes**

**F-3a PAC BOP Review Schedule Gantt Chart**

**F-3b PAC Comment Tabulation Form – Draft Initial LPV BOP (Excel)**

**F-4a Watermaster Response Report (2024-12-03) – PAC Draft 5 Year GSP Evaluation**

**F-4b PAC Recommendation Report (2024-11-08) - Draft Las Posas Valley Basin 5-Year Groundwater Sustainability Plan (GSP) Evaluation**



# LAS POSAS VALLEY BASIN POLICY ADVISORY COMMITTEE

Meeting Minutes for December 19, 2024

The Las Posas Valley Basin Policy Advisory Committee (PAC) held a remote-only meeting at 3:00 PM on Thursday, December 19, 2024, via Zoom.

**A. Call to Order:** Chair Ian Prichard called the meeting to order at 3:03 PM.

**B. Roll Call:**

The following PAC members were present:

1. Calleguas Municipal Water District – Ian Prichard, Chair
2. West Las Posas Large Agriculture – Rob Grether, Vice-chair
3. Commercial – Arturo Aseo
4. Zone Mutual Water Company – John Menne
5. Watermaster (non-voting) – Farai Kaseke
6. East Las Posas Large Agriculture – David Schwabauer
7. East Las Posas Small Agriculture – Josh Waters
8. East Las Posas Mutual Water Company – Laurel Servin
9. West Las Posas Small Agriculture – Richard Cavaletto
10. West Las Posas Mutual Water Company – Steven Murata

The following PAC member was absent:

1. Ventura County Waterworks District Nos. 1 and 19 – David Fleisch

**C. Agenda Review:** There were no comments or requests related to the agenda.

**D. Public Comments:** There were no public comments.

**E. PAC Member Comments:**

Laurel Servin requested follow-up information from Watermaster regarding the need for a policy for reporting LPV Basin residents who may be extracting water from the basin without an allocation. In October 2024, a group of constituents from the LPV Basin reported an issue to Watermaster and to FCGMA about such an issue. Watermaster confirmed receipt of the complaint, but did not have an answer available as legal counsel is working on this issue.

Richard Cavaletto made a request of Watermaster to reply to all correspondence with an acknowledgement of receipt and an anticipated response date for each issue. There was general consensus among the PAC members that this would be a helpful tool so they can communicate to their constituents about the status of items that are under review. Watermaster agreed to take this into consideration.

**F. Regular Agenda**

**1. Approve the Minutes of the November 21, 2024, regular PAC meeting:** Vice-chair Grether moved to approve the minutes as stated for the November 21, 2024, meeting; John Menne seconded the motion. The motion passed with a vote of 9 Ayes; 0-Nays; 0-Abstentions.

**2. 2025 Calendar**

The PAC discussed the timing and frequency of its regular meetings for 2025. The current regular meeting schedule is the first and third Thursday of every month, at 3:00 PM. There was discussion about reducing the frequency to one meeting per month, but with the current projects and due dates to consider, it was decided that the semi-monthly schedule should remain in place until further notice. The meeting schedule for 2025 will continue with regular meetings on the first and third Thursday of every month at 3:00 PM, unless otherwise noticed. Most in-person meetings will be held at the Calleguas Municipal Water District office; all meetings will have a teleconferencing option.

For January 2025 only, the meetings will be held on the second Thursday (January 9, 2025, at 2:00 PM) and the fourth Wednesday (January 22, 2025, at 9:00 AM) to accommodate holiday schedules and reporting due dates.

### **3. Draft Basin Optimization Plan**

Watermaster submitted a committee consultation request to the PAC on December 12, 2024, with a draft copy of the Basin Optimization Plan. The amended Watermaster Rules give the PAC 63 days from date of receipt of the draft Optimization Plan to submit Recommendation Reports to Watermaster, making the deadline February 13, 2025.

PAC Administrator, Tony Morgan, will distribute a working spreadsheet document to all PAC members that will allow PAC to consolidate comments in accordance with the Brown Act. Comments from the PAC are due no later than January 13, 2025.

During the PAC meeting scheduled for January 22, 2025, the PAC will discuss the draft and initial comments in detail. The PAC will review and approve the final recommendation report at the meeting scheduled for February 6, 2025, and the final recommendation report will be submitted to Watermaster on or before February 13, 2025.

### **G. PAC Subcommittee Reports:**

1. Operations Subcommittee: No meeting; nothing to report.
2. Executive Subcommittee: No meeting; nothing to report.
3. Fiscal Subcommittee: No meeting; nothing to report.
4. TAC Subcommittee: The TAC held a regular virtual meeting on December 17, 2024. Vice-chair Grether reported that the meeting was mostly organizational in nature with attention mostly given to due dates and calendared events for the coming year. There were no items requiring attention from the PAC.

### **H. Written Communication: None.**

**I. Future Agenda Items:** Topics which are slated for future agendas include: 1) Sand Canyon Road wells; 2) Review of Watermaster's responses to the PAC's GSP recommendations; and 3) Development of a standard response to constituents who present a protest of basin assessment fees based on their payment of fees to United Water Conservation District.

**J. Adjournment:** Chair Prichard adjourned the meeting at 3:41 PM until the next regular PAC meeting which is scheduled for January 9, 2025, at 2:00 PM.



## Item 20B - LPV PAC Recommendation Report

**TO:** Las Posas Valley Watermaster

**FROM:** Las Posas Valley Watermaster Policy Advisory Committee

**RE:** Recommendation Report – Draft Las Posas Valley Basin 5-Year Groundwater Sustainability Plan (GSP) Evaluation

**DATE:** November 8, 2024

---

Recommendation:

See memo below for recommended changes/additions to the draft GSP Five-Year Update.

Policy Rationale for Recommendation:

See memo below for rationale.

Summary of Facts in Support of Recommendation:

See memo below for complete memo.

Tally of Committee Member Votes:

	YES	NO	ABSTAIN	ABSENT
Ian Prichard, Callegaus MWD	X			
David Fleisch, VC WWD No. 1 & 19	X			
John Menne, Zone MWC	X			
VACANT, Commercial				X
Rob Grether, West LPV Large Ag	X			
David Schwabauer, East LPV Large Ag	X			
Josh Waters, East LPV Small Ag				X
Richard Cavaletto, West LPV Small Ag	X			
Laurel Servin, East LPV MWC				X
Steven Murata, West LPV MWC	X			

Report of Bases for Majority and Minority Committee Member Positions:

The report conformed with previous discussions among the PAC regarding the GSP update.

**PAC Recommendation Report Regarding the Draft Las Posas Valley Basin Five-Year Groundwater Sustainability Plan (GSP) Evaluation**

On August 26, 2024, the Fox Canyon Groundwater Management Agency (FCGMA), serving in its capacity as the Las Posas Valley Basin Watermaster (Watermaster), sent a Committee Consultation request to the Las Posas Valley Policy Advisory Committee (PAC) regarding the Draft Las Posas Valley Basin – 5-Year Groundwater Sustainability Plan (GSP) Evaluation (Draft GSP Evaluation), entitled the First Periodic GSP Evaluation for the LPVB, as prepared by Dudek, the FCGMA’s consultant.

Overall, the document is well-done, and the PAC recognizes the significant effort put forth to prepare the Draft GSP Evaluation by the FCGMA and their consultant, Dudek. Together, they have evidently devoted substantial effort to organizing a comprehensive report assessing and documenting groundwater conditions and management strategies.

Following a thorough review, the PAC is submitting this Recommendation Report to provide recommendations for the Watermaster to consider before finalizing the Draft GSP Evaluation for submission to the California Department of Water Resources (DWR). While the PAC submits these recommendations to help improve the Draft GSP Evaluation for submission to DWR, we also recognize the critical role the Draft GSP Evaluation will have as a foundation for amendments to the GSP Update, the 2025 Basin Optimization Yield Study and the Basin Optimization Plan, all of which are key steps toward achieving long-term groundwater sustainability in the Las Posas Valley.

Following are the policy recommendations approved by the PAC on November 7, 2024.

**I. MODELING AND DATA ACCURACY**

**Recommendation 1: Clearly Distinguish Between Model Predictions and Observed Data Throughout the Draft GSP Evaluation**

Explicitly label both simulated (modeled) water levels and actual water level measurements in all figures, tables, and discussions. This distinction is crucial for evaluating the model's calibration and its reliability in predicting future groundwater conditions. Accurate calibration, informed by observed data, enhances the model's predictive accuracy.

**Recommendation 2: Provide Documentation and Confidence Information for the UWCD Model Used in GSP Evaluation**

The documentation for the UWCD model used in the Draft GSP Evaluation has not been made available, leading to reservations within the PAC regarding reliance on a model that has not undergone review by the Las Posas Valley Technical Advisory Committee (TAC). While models aim to replicate real-world conditions, they are inherently imperfect, and confidence in their findings is especially challenging given the limited number of wells (especially in the WLPMA) available for calibration. This limited data set raises concerns about the appropriate confidence interval for the



## Item 20B - LPV PAC Recommendation Report

model results. The PAC recommends that the Draft GSP Evaluation include comprehensive information from the UWCD model, including documentation and details on confidence intervals, to address these concerns and improve transparency.

### **Recommendation 3: Address Deficiency in Monitoring Data Collection**

A considerable portion of the monitoring data required by the GSP was not collected during the review period. This data is critical for evaluating the sustainability of the WLPMA and East Las Posas Management Area (ELPMA) and for ensuring compliance with the Judgment. The PAC recommends that the Draft GSP Evaluation clearly outline how the FCGMA plans to address this deficiency, detailing steps to promptly acquire the necessary monitoring data to support future updates and model runs.

## **II. CROSS-BASIN AND AREA INTERACTIONS**

### **Recommendation 4: Clarify the Impact of West Las Posas Management Area (WLPMA) Pumping on Oxnard Subbasin Seawater Intrusion**

The Draft GSP Evaluation should address the quantifiable relationship between WLPMA pumping and its incremental effect on seawater intrusion in the Oxnard Subbasin. This can be achieved by either including a detailed discussion of this relationship under various management scenarios or by outlining a process and timeline to conduct a focused assessment. Additionally, the PAC recommends that this topic be robustly addressed in the Basin Optimization Yield Study, utilizing the updated United Water Conservation District (UWCD) Coastal Plain Model.

### **Recommendation 5: Recharacterize Groundwater Underflows Between Oxnard Subbasin and WLPMA**

The evaluation document should recharacterize groundwater underflows from the Oxnard subbasin to WLPMA, and reductions in underflow from WLPMA to Oxnard, which are currently labeled as “losses” of recharge to the Oxnard subbasin. This framing overlooks that many WLPMA extractors within the boundaries of UWCD have understood that the justification for significant extraction fees was for purported groundwater replenishment from the UWCD spreading grounds. Given this understanding of the interconnection between the basins, if the claimed underflows are occurring as stated, they should not simply be viewed as a loss for the Oxnard subbasin. As noted above, greater transparency of the modeling and better data would clarify this problem.

The Draft GSP Evaluation should amend its language to remove the characterization of these underflows as “losses” and instead acknowledge them as part of a balanced, cross-basin groundwater system. Additionally, it would be appropriate for the FCGMA to outline a process to periodically review and update minimum thresholds and measurable objectives on both sides of the boundary between the Las Posas Valley and Oxnard Basins. This approach would ensure an

## Item 20B - LPV PAC Recommendation Report

accurate, equitable, and proportional understanding of recharge dynamics, benefiting the sustainability of both basins.

### **Recommendation 6: Provide Justification for Projected Increase in Simi Valley Inflows**

The Draft GSP Evaluation's future baseline scenario projects nearly 2,000 acre-feet per year (AFY) more in Simi Valley inflows than recent flow levels. The PAC recommends that the Draft GSP Evaluation provide a detailed explanation for this anticipated increase, clarify, and provide supporting data and assumptions that justify this projection. Clear documentation of these projections will enhance stakeholder understanding of the expected inflows and their impact on the overall water management strategy.

## **III. MANAGEMENT AND PROJECT OVERSIGHT**

### **Recommendation 7: Articulate a Clear Master Plan and Leadership for Advancing GSP Management Projects**

The Draft GSP Evaluation outlines various management projects, however, there appears to be no overarching master plan to manage accountability and progress in advancing these projects, nor a designated leader responsible for their progression. Given that the 15-year timeline is relatively short for implementing some of the projects being considered, the PAC recommends that the Draft GSP Evaluation specify how the FCGMA intends to oversee and drive these initiatives. For instance, FCGMA could assign staff to engage periodically (e.g., quarterly) with each project proponent, tracking progress and providing regular updates to FCGMA and stakeholders on any advances or delays. Stakeholders have expressed a strong desire to be informed promptly if a project faces delays or challenges where stakeholder involvement could help mitigate issues, ensuring that the projects are effectively managed within the available timeframe.

### **Recommendation 8: Clarify the Impact of the Proposed Moorpark Desalter on Groundwater Supply, Recharge, and Water Balance**

The PAC recommends that the Draft GSP Evaluation provide a comprehensive discussion of the anticipated effects of the proposed Moorpark desalter on groundwater supply, recharge, and the overall water balance in the ELPMA. Specifically:

- **Groundwater Supply and Recharge Interaction:** The Draft GSP Evaluation should explain how the desalter would influence groundwater extractions and recharge dynamics. If the desalter increases extractions without offsetting them through in-lieu deliveries, it could lead to lower water levels that may undermine sustainability efforts. However, these effects could be mitigated if the desalter's operations encourage dewatering in high groundwater areas near the arroyo, thereby inducing greater recharge, or if the product water is used to reduce extractions in other targeted Basin areas. The Draft GSP Evaluation should address

## Item 20B - LPV PAC Recommendation Report

these factors generally and outline specific actions in the Basin Optimization Plan.

- **Net Impact on Water Balance:** The Draft GSP Evaluation presents conflicting statements about the desalter's effects, suggesting reductions in both groundwater pumping and reliance on imported water. This leaves ambiguity about the net effect on ELPMA's water balance. The Draft GSP Evaluation should clarify the desalter's anticipated impacts on groundwater pumping and imported water usage, with additional analysis in the Basin Optimization Plan to ensure alignment with long-term water balance and sustainability goals.

### **IV. STAKEHOLDER RESPONSIBILITIES AND TRANSPARENCY**

#### **Recommendation 9: Clarify Responsibility for Sustaining Groundwater Dependent Ecosystems (GDEs) along Arroyo Simi/Las Posas**

The PAC recommends that the Draft GSP Evaluation clearly specify that groundwater users will not be held responsible for sustaining vegetation along Arroyo Simi/Las Posas, which is currently supported by inflows from Simi Valley wastewater discharge and dewatering wells. The Draft GSP Evaluation should explicitly state that any impact on vegetation due to reductions in these discharges should not be considered an undesirable result under SGMA in the GSP. Additionally, the PAC recommends that FCGMA establish long-term monitoring to track any potential changes in vegetation health related to GDEs. This ongoing monitoring will allow for a proactive approach to understanding and managing impacts without placing responsibility on groundwater users, thus preventing unintended obligations regarding GDE sustainability.

#### **Recommendation 10: Refine and Clarify the Impact Analysis on Northern ELPMA Wells**

The PAC recommends that the Draft GSP Evaluation provide greater clarity and consideration in the impact analysis for wells in the northern ELPMA, specifically regarding assumptions about well performance and the effects of minimum thresholds on all well owners.

- **Well Performance Assumptions:** The current analysis assumes wells will not experience significant effects until static groundwater levels reach the top of well screens and that partially desaturated screens can still support pumping. While this may be defensible, sustaining pumping at lower rates depends on appropriate pump placement below the adjusted water levels. The Draft GSP Evaluation should discuss the implications of these assumptions, including the key policy question of what constitutes "significant and unreasonable" impacts for this area, as these criteria influence FCGMA and Dudek's approach to the analysis.
- **Consideration of ASR Wells:** The analysis should also account for the effects on Aquifer Storage and Recovery (ASR) operations, as 10 out of the 22 wells in the evaluation area are Calleguas ASR wells (not solely agricultural wells, as Table 2-1 indicates). The Draft GSP Evaluation should provide an accurate representation of well types and address the

## Item 20B - LPV PAC Recommendation Report

potential impact of minimum thresholds on ASR storage and recovery operations.

- **Impact of Minimum Thresholds on All Well Owners:** Finally, the PAC recommends that the Draft GSP Evaluation discuss how established minimum thresholds will impact all well owners in the area, ensuring a comprehensive understanding of threshold implications across different types of groundwater users.

### **Recommendation 11: Enhance Transparency and Accessibility in Sections and Tables 7.1 – 7.3**

The PAC recommends that the following updates be made to improve transparency and ease of access for stakeholders regarding surcharge rates, fee adoption, compliance, and amendment terminology:

- **Table 7-1:** Update the table to provide details on how the Watermaster establishes extraction surcharge rates. At a minimum, add explanatory footnotes or references to relevant FCGMA Resolutions that outline the basis for these rates.
- **Section 7.1.3 – Funding:** Include footnotes, citations, or references that allow readers to locate documents where the FCGMA adopted specific fees, improving accessibility and clarity.
- **Section 7.2 – Enforcement and Legal Actions:** Provide references or links to each of the listed groundwater extractor responsibilities. This addition would support stakeholder compliance with FCGMA and Watermaster requirements by offering clear guidance on necessary steps.
- **Section 7.3 – Plan Amendments:** Clarify the distinctions between a “GSP amendment,” “this Update,” and “periodic GSP evaluation,” and specify whether the “amendment” planned for Quarter 1 of 2025 aligns with the GSP “evaluation” for submission to DWR.

These additions will improve stakeholder understanding of key processes, requirements, and terminology used within the document.

## **CONCLUSION**

We respectfully submit the above policy-related recommendations for consideration by the FCGMA and Dudek. These recommendations reflect the PAC’s commitment to ensuring that the Draft GSP Evaluation is clear, precise, and thoroughly aligned with the objectives set forth in SGMA and the Judgment. We believe these actions will contribute meaningfully to the sustainable management of groundwater in the Las Posas Valley Basin. As stakeholders with a vested interest in the Basin’s long-term health, we look forward to continued collaboration with the FCGMA and Dudek to address these critical areas and to support a balanced, forward-thinking approach in the GSP Evaluation.

## LAS POSAS VALLEY WATERMASTER RESPONSE REPORT

Date: December 03, 2024

To: Las Posas Valley Watermaster Board of Directors

From: Kudzai Farai Kaseke, Assistant Groundwater Manager (FCGMA)

Re: Response Report to PAC Consultation Recommendation Report, Draft First Periodic Evaluation, Groundwater Sustainability Plan for the Las Posas Valley Basin

The Las Posas Valley Watermaster (Watermaster) requested consultation from the Las Posas Valley Policy Advisory Committee (PAC) on the Draft First Periodic Evaluation, Groundwater Sustainability Plan (GSP) for the Las Posas Valley Basin dated August 2024. Watermaster's request was in an August 26, 2024, memorandum to the PAC. The PAC formed an ad hoc subcommittee to review and develop recommendations on the Draft GSP Evaluation. The full PAC discussed the Draft GSP Evaluation at the September 5, 2024, September 19, 2024, October 17, 2024, and November 7, 2024, meetings.

PAC's November 8, 2024, recommendation report included nine recommendations. PAC's recommendations are listed below, followed by Watermaster staff's responses. The Watermaster appreciates PAC's review and recommendations, and PAC's finding that "overall, the document is well-done."

### **Recommendation 1: Clearly Distinguish Between Model Predictions and Observed Data Throughout the Draft GSP Evaluation**

Explicitly label both simulated (modeled) water levels and actual water level measurements in all figures, tables, and discussions. This distinction is crucial for evaluating the model's calibration and its reliability in predicting future groundwater conditions. Accurate calibration, informed by observed data, enhances the model's predictive accuracy.

#### **Response to Recommendation 1:**

Labeling has been clarified for the simulated and observed water level measurements in the Draft GSP Evaluation text, tables, and figures.

### **Recommendation 2: Provide Documentation and Confidence Information for the UWCD Model Used in GSP Evaluation**

The documentation for the UWCD model used in the Draft GSP Evaluation has not been made available, leading to reservations within the PAC regarding reliance on a model that has not undergone review by the Las Posas Valley Technical Advisory Committee (TAC). While models aim to replicate real-world conditions, they are inherently imperfect, and confidence in their findings is especially challenging given the limited number of wells (especially in the WLPMA) available for calibration. This limited data set raises concerns about the appropriate confidence interval for the model results. The PAC recommends that the Draft GSP Evaluation include comprehensive information from the UWCD model, including documentation and details on confidence intervals, to address these concerns and improve transparency.

## Item 20C - Watermaster Response - PAC

### **Response to Recommendation 2:**

UWCD provided extensive model documentation for the version of the model used for the GSP. UWCD is currently working on the supplemental documentation to cover the changes in the model made since the version used for the GSP. As of the time this response report was prepared, UWCD had not yet finalized this supplemental documentation.

### **Recommendation 3: Address Deficiency in Monitoring Data Collection**

A considerable portion of the monitoring data required by the GSP was not collected during the review period. This data is critical for evaluating the sustainability of the WLPMA and East Las Posas Management Area (ELPMA) and for ensuring compliance with the Judgment. The PAC recommends that the Draft GSP Evaluation clearly outline how the FCGMA plans to address this deficiency, detailing steps to promptly acquire the necessary monitoring data to support future updates and model runs.

### **Response to Recommendation 3:**

The Watermaster agrees that the monitoring in LPVB can be improved. The Watermaster relies on partner agencies for these monitoring data. The Watermaster will work with these partner agencies to formalize agreements to assure that appropriate monitoring data is collected. If agreements cannot be reached to assure appropriate data collection at one or more key wells, Watermaster will evaluate monitoring these wells with Watermaster staff. To address data gaps due to the absence of monitoring facilities identified in the GSP and Draft GSP Evaluation, the Watermaster plans to develop estimated costs and a spending plan, with committee consultation, to include in Watermaster's annual budget for funding through basin assessments. Additionally, Watermaster staff continues to explore opportunities for grant funding that can be used to install dedicated monitoring wells and fill data gaps and plans to request Technical Support Services from DWR as suggested by the TAC, if alternative funding sources cannot be secured.

### **Recommendation 4: Clarify the Impact of West Las Posas Management Area (WLPMA) Pumping on Oxnard Subbasin Seawater Intrusion**

The Draft GSP Evaluation should address the quantifiable relationship between WLPMA pumping and its incremental effect on seawater intrusion in the Oxnard Subbasin. This can be achieved by either including a detailed discussion of this relationship under various management scenarios or by outlining a process and timeline to conduct a focused assessment. Additionally, the PAC recommends that this topic be robustly addressed in the Basin Optimization Yield Study, utilizing the updated United Water Conservation District (UWCD) Coastal Plain Model.

### **Response to Recommendation 4:**

Analysis of the quantifiable relationship between groundwater extraction in the WLPMA and incremental effect on seawater intrusion in the Oxnard Subbasin is beyond the scope of the Draft GSP Evaluation. Rather, the Draft GSP Evaluation follows SGMA and the GSP by acknowledging the interconnectedness of the Oxnard Subbasin and the WLPMA. The Watermaster agrees this is a good recommendation for modeling scenarios that could be conducted in the future.

### **Recommendation 5: Recharacterize Groundwater Underflows Between Oxnard Subbasin and WLPMA**

The evaluation document should recharacterize groundwater underflows from the Oxnard subbasin to WLPMA, and reductions in underflow from WLPMA to Oxnard, which are currently labeled as

## Item 20C - Watermaster Response - PAC

“losses” of recharge to the Oxnard subbasin. This framing overlooks that many WLPMA extractors within the boundaries of UWCD have understood that the justification for significant extraction fees was for purported groundwater replenishment from the UWCD spreading grounds. Given this understanding of the interconnection between the basins, if the claimed underflows are occurring as stated, they should not simply be viewed as a loss for the Oxnard subbasin. As noted above, greater transparency of the modeling and better data would clarify this problem.

The Draft GSP Evaluation should amend its language to remove the characterization of these underflows as “losses” and instead acknowledge them as part of a balanced, cross-basin groundwater system. Additionally, it would be appropriate for the FCGMA to outline a process to periodically review and update minimum thresholds and measurable objectives on both sides of the boundary between the Las Posas Valley and Oxnard Basins. This approach would ensure an accurate, equitable, and proportional understanding of recharge dynamics, benefiting the sustainability of both basins.

### **Response to Recommendation 5:**

The term "loss" has been replaced in this section by the term "difference" to remove an unintended value judgement in the draft GSP Evaluation.

The periodic review process for evaluating and updating the minimum thresholds and measurable objectives is set forth in SGMA. FCGMA agrees that the thresholds and objectives on both sides of the boundary between the WLPMA and the Oxnard Subbasin should be reviewed and, if necessary, updated concurrently to ensure that the interbasin flows are adequately accounted for in basin management decisions.

### **Recommendation 6: Provide Justification for Projected Increase in Simi Valley Inflows**

The Draft GSP Evaluation’s future baseline scenario projects nearly 2,000 acre-feet per year (AFY) more in Simi Valley inflows than recent flow levels. The PAC recommends that the Draft GSP Evaluation provide a detailed explanation for this anticipated increase, clarify, and provide supporting data and assumptions that justify this projection. Clear documentation of these projections will enhance stakeholder understanding of the expected inflows and their impact on the overall water management strategy.

### **Response to Recommendation 6:**

The future baseline scenario in the GSP Evaluation revised the flows in Arroyo Simi-Las Posas based on a change in the projected water discharge from the Simi Valley Water Quality Control Plant (SVWQCP) presented in the 2020 Urban Water Management Plan. This change removed an assumption in the GSP that these flows would be reduced over time.

The Watermaster agrees that discharges from the SVWQCP have declined over the past decade in response to increasing water conservation efforts within the City of Simi Valley. Over the 2016 to 2022 period, SVCWQP discharges averaged approximately 8,040 AFY, which is approximately 1,890 AFY less than the assumptions used in the Future Baseline and No New Projects 1 (NNP1) scenarios. To evaluate the effects of reduced SVWQCP discharges on groundwater conditions within the ELPMA, the No New Projects 2 (NNP2) model scenario simulated a SVWQCP discharge rate of 8,040 AFY (Section 5.2.2.2.2). The sustainable yield of the NNP1 and NNP2 scenarios was similar. Comparison of the two scenarios indicated that under the simulated pumping distribution, SVWQCP discharges

## Item 20C - Watermaster Response - PAC

in excess of approximately 8,040 AFY do not significantly increase the volume of recharge to the ELPMA. Instead, they contribute to increased outflows to the PVB (Section 5.2.2.2.2).

### **Recommendation 7: Articulate a Clear Master Plan and Leadership for Advancing GSP Management Projects**

The Draft GSP Evaluation outlines various management projects, however, there appears to be no overarching master plan to manage accountability and progress in advancing these projects, nor a designated leader responsible for their progression. Given that the 15-year timeline is relatively short for implementing some of the projects being considered, the PAC recommends that the Draft GSP Evaluation specify how the FCGMA intends to oversee and drive these initiatives. For instance, FCGMA could assign staff to engage periodically (e.g., quarterly) with each project proponent, tracking progress and providing regular updates to FCGMA and stakeholders on any advances or delays. Stakeholders have expressed a strong desire to be informed promptly if a project faces delays or challenges where stakeholder involvement could help mitigate issues, ensuring that the projects are effectively managed within the available timeframe.

#### **Response to Recommendation 7:**

Watermaster agrees that a long-term master plan is appropriate. The evaluation of projects in the Basin Optimization Plan currently under way will help to inform a master plan guided by Board direction. In addition, Watermaster has appointed staff to engage periodically with project proponents to enable timely project updates with stakeholders.

### **Recommendation 8: Clarify the Impact of the Proposed Moorpark Desalter on Groundwater Supply, Recharge, and Water Balance**

The PAC recommends that the Draft GSP Evaluation provide a comprehensive discussion of the anticipated effects of the proposed Moorpark desalter on groundwater supply, recharge, and the overall water balance in the ELPMA. Specifically:

- **Groundwater Supply and Recharge Interaction:** The Draft GSP Evaluation should explain how the desalter would influence groundwater extractions and recharge dynamics. If the desalter increases extractions without offsetting them through in-lieu deliveries, it could lead to lower water levels that may undermine sustainability efforts. However, these effects could be mitigated if the desalter's operations encourage dewatering in high groundwater areas near the arroyo, thereby inducing greater recharge, or if the product water is used to reduce extractions in other targeted Basin areas. The Draft GSP Evaluation should address these factors generally and outline specific actions in the Basin Optimization Plan.
- **Net Impact on Water Balance:** The Draft GSP Evaluation presents conflicting statements about the desalter's effects, suggesting reductions in both groundwater pumping and reliance on imported water. This leaves ambiguity about the net effect on ELPMA's water balance. The Draft GSP Evaluation should clarify the desalter's anticipated impacts on groundwater pumping and imported water usage, with additional analysis in the Basin Optimization Plan to ensure alignment with long-term water balance and sustainability goals.

#### **Response to Recommendation 8:**

The information provided by the project proponent was used in the Draft GSP Evaluation. This information is limited. The Basin Optimization Plan will recommend that a full feasibility study be



## Item 20C - Watermaster Response - PAC

conducted for this project. Based on current information, Watermaster cannot assess the potential impacts of the proposed desalter until project is clearly defined, hence the need for a feasibility study.

The Draft GSP Evaluation incorrectly stated that the project would reduce groundwater demands and prevent groundwater elevation declines. That language has been deleted from the draft.

### **Recommendation 9: Clarify Responsibility for Sustaining Groundwater Dependent Ecosystems (GDEs) along Arroyo Simi/Las Posas**

The PAC recommends that the Draft GSP Evaluation clearly specify that groundwater users will not be held responsible for sustaining vegetation along Arroyo Simi/Las Posas, which is currently supported by inflows from Simi Valley wastewater discharge and dewatering wells. The Draft GSP Evaluation should explicitly state that any impact on vegetation due to reductions in these discharges should not be considered an undesirable result under SGMA in the GSP. Additionally, the PAC recommends that FCGMA establish long-term monitoring to track any potential changes in vegetation health related to GDEs. This ongoing monitoring will allow for a proactive approach to understanding and managing impacts without placing responsibility on groundwater users, thus preventing unintended obligations regarding GDE sustainability.

### **Response to Recommendation 9:**

Section 3.3.6 of the GSP notes that "changes in groundwater elevation in the Shallow Alluvial Aquifer related to decreased surface water flows cannot be mitigated by management actions related to groundwater pumping." Further the GSP notes "the measurable objectives selected to maintain groundwater elevations adjacent to Arroyo Las Posas at levels that promote the health of the vegetation in the Arroyo Simi-Las Posas potential GDE are established 'for the purpose of improving overall conditions' in the ELPMA, 'but failure to achieve those objectives shall not be grounds for finding of inadequacy of the Plan' (23 CCR 354.30[g]). FCGMA proposes this aspirational goal with recognition of the dependence on continuation of these external water sources." Text has been added to call out this GSP finding. Watermaster notes that DWR has requested that additional monitoring facilities be constructed to fill data gaps regarding the potential GDEs. Watermaster has developed a schedule, which may be updated or modified based on committee consultation and funding availability (section 2.7.1 of the Draft GDE Evaluation).

### **Recommendation 10: Refine and Clarify the Impact Analysis on Northern ELPMA Wells**

The PAC recommends that the Draft GSP Evaluation provide greater clarity and consideration in the impact analysis for wells in the northern ELPMA, specifically regarding assumptions about well performance and the effects of minimum thresholds on all well owners.

- **Well Performance Assumptions:** The current analysis assumes wells will not experience significant effects until static groundwater levels reach the top of well screens and that partially desaturated screens can still support pumping. While this may be defensible, sustaining pumping at lower rates depends on appropriate pump placement below the adjusted water levels. The Draft GSP Evaluation should discuss the implications of these assumptions, including the key policy question of what constitutes "significant and unreasonable" impacts for this area, as these criteria influence FCGMA and Dudek's approach to the analysis.

## Item 20C - Watermaster Response - PAC

- **Consideration of ASR Wells:** The analysis should also account for the effects on Aquifer Storage and Recovery (ASR) operations, as 10 out of the 22 wells in the evaluation area are Calleguas ASR wells (not solely agricultural wells, as Table 2-1 indicates). The Draft GSP Evaluation should provide an accurate representation of well types and address the potential impact of minimum thresholds on ASR storage and recovery operations.

### **Response to Recommendation 10:**

The FCGMA Board determined in the GSP that a loss of 20% or more of storage beyond the 2015 level in critical areas of the ELPMA constitutes a significant and unreasonable impact to the area. The analysis in the Draft GSP Evaluation evaluates well screens and projected water levels, but not significant effects due to production. The column label in Table 2-1 has been revised to "Projected Water Level Below 50% of the Well Screen." The previous label incorrectly used the word "production."

### **Recommendation 11: Enhance Transparency and Accessibility in Sections and Tables 7.1 – 7.3**

The PAC recommends that the following updates be made to improve transparency and ease of access for stakeholders regarding surcharge rates, fee adoption, compliance, and amendment terminology:

- **Table 7-1:** Update the table to provide details on how the Watermaster establishes extraction surcharge rates. At a minimum, add explanatory footnotes or references to relevant FCGMA Resolutions that outline the basis for these rates.
- **Section 7.1.3 – Funding:** Include footnotes, citations, or references that allow readers to locate documents where the FCGMA adopted specific fees, improving accessibility and clarity.
- **Section 7.2 – Enforcement and Legal Actions:** Provide references or links to each of the listed groundwater extractor responsibilities. This addition would support stakeholder compliance with FCGMA and Watermaster requirements by offering clear guidance on necessary steps.
- **Section 7.3 – Plan Amendments:** Clarify the distinctions between a “GSP amendment,” “this Update,” and “periodic GSP evaluation,” and specify whether the “amendment” planned for Quarter 1 of 2025 aligns with the GSP “evaluation” for submission to DWR.

### **Response to Recommendation 10:**

- **Table 7-1:** Table 7-1 specifically identifies the resolution or ordinance implementing each identified regulatory action. All resolutions and ordinances are available for review and download at the Agency's website [www.fcgma.org](http://www.fcgma.org). A footnote has been added to the table.
- **Section 7.1.3 – Funding:** Footnotes have been added identifying the specific resolutions implementing the funding actions to text in section 7.1.3.
- **Section 7.2 – Enforcement and Legal Actions:** A footnote has been added to section 7.2 identifying availability of resolutions and ordinances at [www.fcgma.org](http://www.fcgma.org).

## Item 20C - Watermaster Response - PAC

- **Section 7.3 – Plan Amendments:** The final draft GSP Evaluation no longer envisions a GSP amendment.