Las Posas Valley Groundwater Basin
Technical Advisory Committee Regular Meeting

Tuesday January 21, 2025, 2:00 PM

Via Zoom:
https://us02web.zoom.us/j/84168071218?pwd=Kv42H0XegH4TthbvJUgzTrzACgXM8b.1
Webinar ID: 841 6807 1218
Passcode: 150451

NOTICE OF MEETING

NOTICE IS HEREBY GIVEN that the Las Posas Basin Technical Advisory Committee (TAC) will hold a regular meeting via Zoom at **2 PM on Tuesday January 21, 2025**.

AGENDA

A. Call to Order

B. Roll Call

C. Agenda Review

D. Public Comments

E. TAC Member Comments

F. Regular Agenda

1. Approve the Minutes of the January 7, 2025 TAC Regular Meeting (attached)

2. Recommendation Report Review – Basin Optimization Yield Study Schedule

The TAC reviewed the Basin Optimization Yield Study schedule submitted by the Watermaster for Committee Consultation in the January 7, 2024 regular meeting. The TAC Administrator has prepared the attached draft Recommendation Report summarizing TAC comments on the Basin Optimization Yield schedule. The draft Recommendation Report for this consultation request includes comments and recommendations for the Watermaster and their consultant (Dudek) to consider.

The TAC will discuss the draft Recommendation Report, provide feedback to the TAC Administrator, and consider voting to authorize the Administrator to finalize the report and submit it to the Watermaster.

3. Recommendation Report Review – Basin Optimization Yield Study Modeling Approach

The TAC received a presentation from the Watermaster's technical consultant (Dudek) on the Basin Optimization Yield Study modeling approach in the January 7, 2024 regular meeting. Comments and recommendations on the Basin Optimization Yield Study modeling approach are included in the attached draft Recommendation Report.

The TAC will discuss the draft Recommendation Report, provide feedback to the TAC Administrator, and consider voting to authorize the Administrator to finalize the report and submit it to the Watermaster.

4. Committee Consultation - Draft Las Posas Valley Basin Groundwater Sustainability Plan 2025 Annual Report Covering Water Year 2024

The Watermaster submitted the attached request for Committee Consultation and review of the draft Las Posas Valley Basin Groundwater Sustainability Plan (GSP) Annual Report Covering Water Year 2024 to the TAC on January 15, 2025. The Judgment requires the Watermaster file a GSP Annual Report covering Water Year 2024 to the California Department of Water Resources (DWR) by April 1, 2025. The attached draft Annual Report is incomplete, but the Watermaster requests the TAC review the information that is currently available and provide feedback in the form of a Recommendation Report as soon as possible.

The TAC will discuss the partial draft Annual Report and assess the need and plan for preparation of a Recommendation Report to the Watermaster.

5. Ongoing Committee Consultation– Draft Basin Optimization Plan

The TAC will continue to discuss comments on the draft Basin Optimization Plan (dBOP) for the Las Posas Valley Basin (LPVB), which was originally distributed to the TAC in the agenda for the December 17, 2024 regular meeting. TAC member comments on the dBOP are included in tabulated comment matrices attached to this agenda.

The TAC will discuss the comments provided to date and plan for preparation of a Recommendation Report to the Watermaster by February 13, 2025.

6. Discussion of Watermaster Response to TAC Recommendation Report on Draft Las Posas Valley Basin 5 Year Groundwater Sustainability Plan (GSP) Evaluation

The Watermaster prepared a Response Report replying to the TAC Recommendation Report on the draft Las Posas Valley Basin 5 Year Groundwater Sustainability Plan (GSP) Evaluation. The Response Report was presented to the Watermaster Board on December 13, 2024. The TAC initially discussed this Response Report on December 17, 2024 and requested further discussion in a later meeting.

The TAC will discuss the Response Report (attached) and Watermaster responses to individual TAC comments on the draft 5-year GSP Evaluation.

7. Update on Committee Consultation Review Schedule

The TAC will receive an update on the schedule for upcoming committee consultations from the Watermaster Representative. Known current and upcoming consultation are summarized in the table below:

Consultation Description	Expected Request Date	Expected Review Due Date
Draft Basin Optimization Plan	12/12/24	2/13/25
Basin Optimization Yield Study Schedule and Alternatives to UWCD Modeling for WLPMA	12/23/24	1/31/25
Presentation of Basin Optimization Yield Study Model Scenarios by Dudek	1/7/25 Regular Meeting	Recommendation Report by 1/21/25
Draft Water Year 2024 Annual Report	1/15/25	2/15/25
Calleguas ASR Project Operations Plan	TBD	TBD

8. Schedule for Completing Committee Consultations and Related Recommendation Reports

The TAC will discuss the schedule for completing the current reviews requested by the Watermaster and approaches for meeting the requested delivery dates.

G. Items for Future Agenda

Potential items for future agenda will be considered by the TAC

H. Adjourn

Attachment 1

Minutes of the January 7, 2024 TAC Regular Meeting

Las Posas Valley Groundwater Basin
Technical Advisory Committee Regular Meeting

Meeting Minutes
for
January 7, 2025

A. Call to Order

Chair Chad Taylor called the Las Posas Valley Groundwater Basin Technical Advisory Committee (TAC) to order at 2:01 pm.

B. Roll Call

Voting TAC members present (via Zoom):

- Chair Chad Taylor - Present
- Vice Chair Tony Morgan - Present
- Dr. Bob Abrams - Present

All non-voting TAC members were present (via Zoom):

- Bryan Bondy – Present
- Kimball "Kim" Loeb – Present

Chair Taylor reported the TAC had a quorum with all three voting members were all present.

C. Agenda Review

Chair Taylor asked TAC members for comments on or requests for additions to the agenda that was published by the Watermaster on January 3, 2025. Mr. Bondy asked the other TAC members to consider moving discussion of the draft Basin Optimization Plan (dBOP Item 5 as published) to take place before the presentation of Basin Optimization Yield model scenarios (Item 3 as published) He noted that there may be comments on the dBOP relevant to the model scenario presentation and subsequent discussion. The other TAC members agreed to this change.

No public comments on the agenda were provided.

D. Public Comments

Chair Taylor provided an opportunity for public comments on items not on the agenda and none were received.

E. TAC Member Comments

Mr. Taylor asked TAC members for comments on items not on the agenda and none were raised.

F. Regular Agenda

1. Approve the Minutes of the December 17, 2024 Regular Meeting

Chad asked the TAC members for discussion and/or comments on the draft minutes for the December 17, 2024 regular TAC meeting. Mr. Bondy noted that the minutes did not include discussion about bringing the subject of the Watermaster Response Report to the TAC GSP

Periodic Evaluation Recommendation Report up for discussion in future agenda and Mr. Taylor indicated that he would amend the minutes to include this detail.

MOTION: Vice Chair Morgan moved to approve minutes of the December 17, 2024 TAC Meeting as amended
SECOND: Dr. Abrams seconded the motion
VOTE: Unanimously approved

2. 2025 TAC Calendar

Chair Taylor asked TAC members to consider the schedule for meetings in 2025, reminding all attendees that TAC meetings had been scheduled for the first and third Tuesdays of every month at 2 PM. Meetings are always held remotely through Zoom, consistent with the Judgment. He noted that existing commitments require two meetings a month and asked for discussion of the regular meeting schedule beyond existing commitments.

Vice Chair Morgan indicated that for ease of scheduling he preferred to maintain the current schedule and went on to say that having meetings on the calendar that are later cancelled is easier than scheduling special meetings on short notice.

Mr. Taylor asked TAC members if two meeting durations was sufficient, and all agreed it was. Mr. Taylor then summarized that the TAC would continue to hold regular meetings at 2 PM with two hour duration on the 1st and 3rd Tuesday of every month. A calendar showing this schedule had been sent to the Watermaster for publication.

The TAC members agreed that a vote on the schedule was unnecessary.

No public comments were made on this item.

3. Ongoing Committee Consultation– Draft Basin Optimization Plan (originally Item 5 in published agenda)

Mr. Taylor advanced to continued discussion of the draft Basin Optimization Plan (dBOP), reminding TAC members that this consultation request was first discussed in the December 17, 2024 TAC meeting and that TAC member comments in tabular formats are due to the Administrator on Wednesday, January 15, 2025.

Mr. Bondy commented that the project identified as number 7 in the dBOP is presented as a feasibility study only but is very similar to project number 2. The main difference is the location, with project 7 proposed for the northern area of the East Las Posas Management Area (ELPMA). He provided that the information necessary to plan for project 7 may be largely available and the feasibility requirements could be limited. He indicated that the required infrastructure to deliver water from alternative sources to the project 7 area exists and there are groundwater users in the area who could conceptually receive in lieu water. Mr. Bondy suggested project 7 be elevated from a feasibility study to the same status as project 2 and be included in the Basin Optimization Yield Study(BOYS) analyses.

Mr. Loeb indicated the Watermaster staff and their technical consultants Dudek don't know without a study which local groundwater users have connections to the Waterworks distribution system or the volume of water Waterworks could potentially provide to the area. The intention of the feasibility study identified in the dBOP was to evaluate these components of the project. Mr. Bondy responded that replacing Waterworks groundwater use with in lieu

deliveries may be sufficient to have a beneficial effect on water levels in the area for the BOYS, with additional delivery to other users addressed in a subsequent study.

During further discussion TAC members agreed to recommend the Watermaster coordinate with the Waterworks District to identify information that could be used to include project 7 in the BOYS analyses.

Mr. Bondy urged the other TAC members to carefully review the water supply and yield augmentation benefits for the projects in the dBOP. He also noted that there is interplay between some of the projects and discussion of project dependencies and suggested the Watermaster consider adding a graphic that shows the dependencies between projects and explores the relationship between the water supplies for the projects. This would help the reader understand what projects

Dr. Abrams agreed that including graphics simplifying the comparison between the projects would be beneficial. Mr. Morgan confirmed that visual representations of the interdependencies between the projects would make the dBOP more understandable for stakeholders.

Mr. Taylor provided an opportunity for public comment on the dBOP. Russ McGlothlin offered three comments. First, he alerted the TAC to an apparent incomplete sentence at the end of the second paragraph of Section 2.2.4.4. Second, he reinforced Mr. Bondy's comments about getting more details on overlapping projects and integration. Third, Mr. McGlothlin recommended the TAC take note of the schedule and budget information in the dBOP. He indicated there should be alignment between the schedule and budgets for all projects, especially those that should be moved forward imminently to limit the need for urgent rampdown.

4. Presentation – Basin Optimization Yield Draft Model Scenarios (Item 3 in published agenda)

Mr. Taylor invited Dr. Trevor Jones of Dudek to present draft model scenarios for the assessment of optimized yield for the BOYS to the TAC. Dr. Jones presentation included information summarizing the following:

- Objectives of the BOYS, including estimating optimized yield and rampdown rate to support sustainable groundwater management
- Technical approach using the Updated Coastal Plain Model and East Las Posas Model to simulate conditions, as reviewed by the TAC and approved by the Watermaster
- Baseline and Project scenario assumptions for model simulation
- Expected timeline for BOYS completion

The slides from Dr. Jones presentation are attached to these minutes.

Following the presentation, Mr. Taylor asked the TAC for discussion, comments, and questions. He began by asking Dr. Jones if the TAC recommends adding dBOP project 7 to the BOYS analyses as discussed in the previous agenda item, can that be accommodated in the existing schedule? Dr. Jones responded that he thought it could, but coordination would be required.

Mr. Taylor also asked whether the two models will use the same hydrologic condition assumptions presented and if the logistics have been developed for defining and running model scenarios with United Water Conservation District (UWCD, the authors of the Coastal

Plain Model). Dr. Jones indicated that the two models will use the same hydrologic assumptions and Dudek and UWCD have a working relationship that will allow them to collaborate in defining and running scenarios for the two models.

Mr. Bondy commented that when modeling for the West Las Posas Management Area (WLPMA) it would be interesting to consider the Oxnard Extraction Barrier Brackish Water Treatment project, which could have significant impact to water levels in the WLPMA. For long term planning and rampdown estimates this would be important to understand and include in the BOYS analyses.

Mr. Bondy also asked that Dudek track and present changes in outflow estimates, including surface water outflow, from the ELPMA to the Pleasant Valley Basin resulting from the with projects scenario. If implementation of projects leads to increased flow in the Arroyo, then the volume that discharges to the neighboring basin should be quantified. This could be an opportunity for regional partnership between the Las Posas and Pleasant Valley basins.

Lastly, Mr. Bondy referred to slide 18 in the presentation, which described importing 1,762 acre feet per year (AFY) of water from Calleguas Municipal Water District (CMWD) for in lieu use in WLPMA. Mr. Bondy noted that the volume on the slide may be arbitrary and is not necessarily the volume required to stabilize water levels. The recent Las Posas Valley Basin assessments show that the areas struggling to meet minimum thresholds in the Groundwater Sustainability Plan (GSP) are the local water level depressions from pumping in WLPMA and northern ELMPA. These area the areas where in lieu projects are being considered. The modeling evaluation of those projects could be completed as optimization evaluations wherein the volume of in lieu water is iteratively adjusted to identify the reduction in pumping needed to reduce the local pumping depressions.

Mr. Taylor asked for public comments on the presentation and proposed modeling approach for the BOYS.

Robert Hampson, a Fox Canyon Groundwater Management Agency hydrogeologist commented that the plan to use the modeling scenario with no new projects in the Oxnard Basin was selected because it was identified as the scenario that supported sustainable management of that basin. That scenario included a reduction in pumping from current levels in Oxnard, which is expected to result in higher water levels and reduced seawater intrusion. This reduced pumping in Oxnard is also simulated to increase groundwater flow from Oxnard into WLPMA and the Watermaster and Dudek believe this is the correct scenario to use for the BOYS.

John Grether asked two questions. First, will there be a role for direct stakeholder engagement in the BOYS process, or is the intent that public comments will be presented to the TAC and Policy Advisory Committee (PAC). Second, is the timeframe presented for the BOYS consistent with the Judgment?

Mr. Loeb responded that there will be an opportunity for stakeholder review of the complete draft BOYS in addition to the ability for presentation of comments to the TAC and PAC during study development.

TAC members did not have information regarding the BOYS schedule in relation to the Judgement.

5. Committee Consultation – Basin Optimization Yield Study Schedule (Item 4 in published agenda)

Chair Taylor turned to discussion of the schedule for the BOYS. The Watermaster provided the revised BOYS schedule for the TAC to review via email to all TAC members on December 23, 2024, noting that exigent circumstances necessitate an extension of the schedule that was recently amended by the Court. In addition to review and feedback on the schedule, the Watermaster also requested the TAC consider three options for assessing sustainability, optimizing yield, and defining rampdown requirements in the WLPMA if the Watermaster and UWCD are not able to reach an agreement for application of the Updated Coastal Plain Model.

TAC comments on the schedule focused on the TAC review periods. The schedule presented by the Watermaster includes TAC review in Task 1 – Model Scenario Development, Task 2 – Baseline and Project Scenario Numerical Modeling, and Task 4 – Draft BOYS. TAC members noted that the review period for the Task 2 model scenario results was 21 days while the period for TAC and PAC review of the draft BOYS was 60 days. They discussed the potential need for more time to review the model scenario results, especially in the case that the TAC requests supporting information following presentation of model results by the Watermaster and Dudek. TAC members expressed a willingness to have less time to review the draft BOYS document in exchange for more time to review the model results. TAC members were in agreement that the model results were the more important component for a thorough technical review, and that a thorough review prior to preparation of the report would be more beneficial to the preparation of that report and maintenance of the overall schedule.

Mr. Taylor reminded the other TAC members that the 60-day draft BOYS review period was for the TAC and PAC, and that the PAC had no other review opportunities during preparation of the BOYS. He indicated a concern that requesting the Watermaster adjust the schedule to reduce the 60-day draft BOYS review period and provide more time for TAC review of model scenario results would also reduce the PAC review period.

Mr. Morgan reminded the TAC that the schedule presented assumes the UWCD Coastal Plain Model will be available for use in the BOYS analyses. Mr. Taylor agreed and pointed the TAC to the three options in the consultation request the Watermaster has identified could be applied for assessing basin optimization in WLPMA if the Coastal Plain Model is not available.

Mr. Loeb informed the TAC that negotiations with UWCD are ongoing and are delayed, but the parties are not at an impasse. The proposed schedule assumed Watermaster and UWCD model coordination by January 1st, which did not occur, but there is still time to reach an agreement and complete the BOYS as scoped.

The TAC members briefly discussed the options presented by the Watermaster if the UWCD Coastal Plain Model is not available. They agreed the brief descriptions of these options in the consultation request was not sufficient for the TAC to provide specific feedback or recommend prioritization of the options. The TAC members did note that the schedule impacts identified for options 1 and 2 appeared reasonable, depending on the specific technical approach for each option. The schedule for option 3 could also be feasible but was aggressive. They also noted that option 3 would likely represent a significant expense.

Mr. Morgan asked if would be appropriate for the TAC to express support for the Watermaster using the existing UWCD Coastal Plain Model. The other TAC members agreed this would be an appropriate inclusion in the Recommendation Report for this consultation.

Chair Taylor asked for public comment on this item. Dr. Farai Kaseke, Watermaster staff, reminded the TAC they are independent from the PAC and TAC Recommendation Reports should be prepared independent from the PAC.

6. Report on December 20, 2024 Basin Tour Provided by Bryan Bondy for Chad Taylor and Watermaster staff

Mr. Taylor reported on the basin tour Mr. Bondy provided to Dr. Kaseke, Mr. Hampson, and himself on December 20, 2024. He noted that the tour included important and interesting areas of the basin relevant to groundwater management and thanked Mr. Bondy for taking the time; it was productive.

7. Update on Committee Consultation Review Schedule

Mr. Taylor invited Mr. Loeb to update the TAC on upcoming Committee Consultation request expectations from the Watermaster.

Mr. Loeb reported that the Watermaster expected to request Committee Consultation on the draft Annual Report for Water Year 2024 on January 15, 2025 and that comments in the form of a recommendation report would be due to the Watermaster by February 15, 2025.

Mr. Morgan recommended comments on this upcoming request be captured in the same spreadsheet format that TAC members are using for the dBOP review and other TAC members agreed.

No other TAC or public comments were provided.

8. Schedule for Completing Committee Consultations and Related Recommendation Reports

The TAC advanced to discussion of the schedule for completing current and upcoming reviews requested by the Watermaster.

Mr. Taylor summarized the active TAC reviews noting that the a Recommendation Report on the BOYS modeling approach would be required to be submitted by January 21st and a Recommendation Report on the BOYS schedule would be due on January 31st. Both draft Recommendation Reports would need to be reviewed and voted on by the TAC in the next regular meeting on January 21st. To accomplish this, all comments on both consultations would be required to be submitted to the TAC Administrator by January 15th to be included in the next meeting agenda.

Comments and recommendations for those Recommendation Reports were briefly reviewed.

Mr. Taylor went on to remind TAC members that written comments and recommendations on the dBOP in tabular format were also due to the Administrator by January 15th. These were planned to be included in the agenda for the regular TAC meeting on January 21st.

No public comments were provided.

G. Items for Future Agendas

Mr. Taylor opened the discussion of items for future agenda with a reminder that review of the Watermaster Response Report on TAC recommendations for the GSP Periodic Evaluation was discussed earlier and will be added to the next agenda.

No other items for future agenda were identified by the TAC or public attendees.

H. Adjourn

Mr. Taylor made a motion to adjourn the meeting at 3:47 PM.

MOTION: Mr. Taylor moved to adjourn
SECOND: Mr. Morgan seconded
VOTE: Unanimously approved

Attachment 1

LPV Basin Optimization Yield Study – Modeling Approach presentation, January 2024, presented by Dr. Trevor Jones

Fox Canyon Groundwater Management Agency

LPV Basin Optimization Yield Study – Modeling Approach

TREVOR JONES
DUDEK

JANUARY 2024

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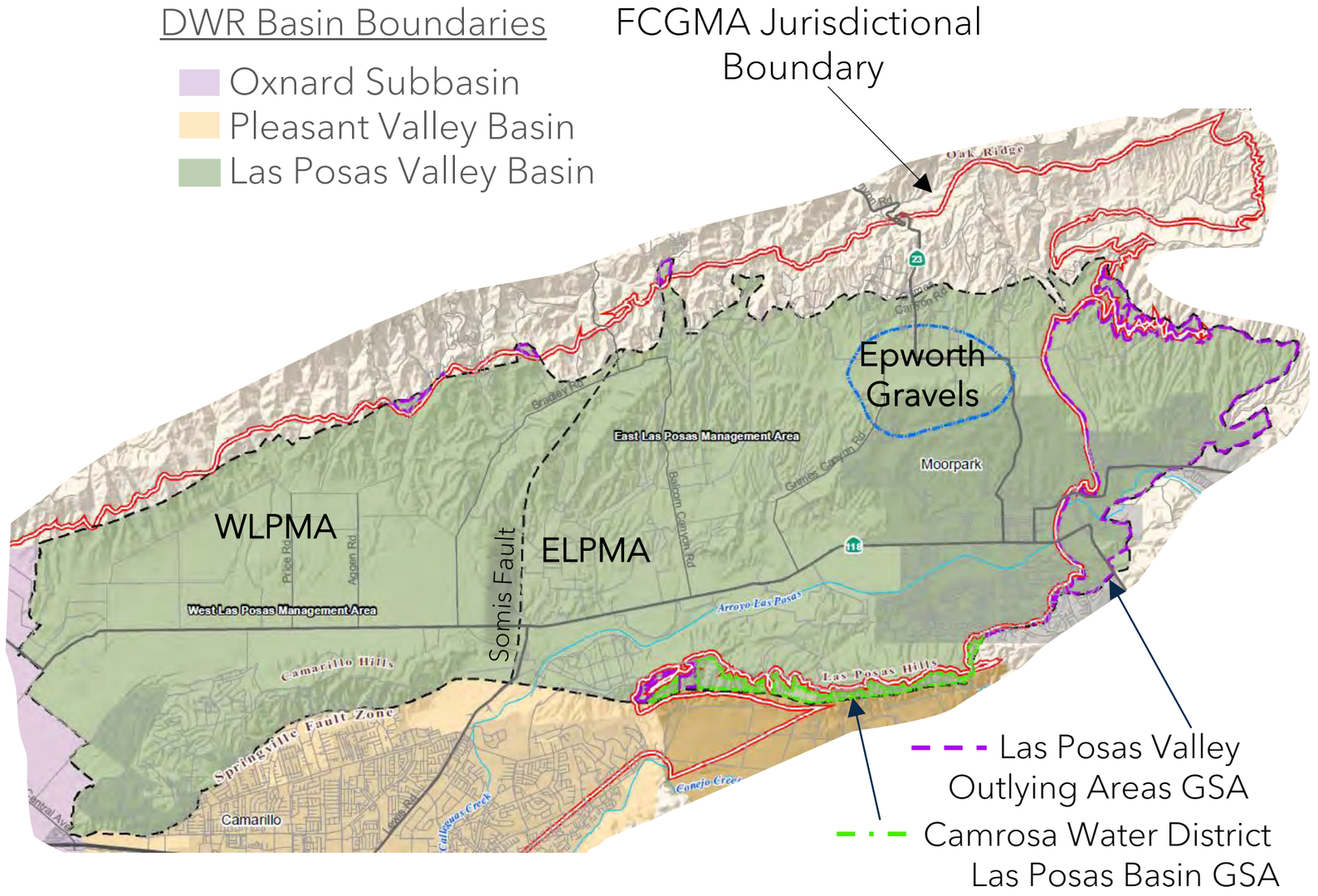
LPV Basin Optimization Yield Study

- **Objective:** Quantify the Basin Optimization Yield and Rampdown Rate for the LPV Basin
- **Basin Optimization Yield:** the estimated yield that is projected to be available to achieve Sustainable Groundwater Management by 2040. Accounts for water available from:
  - Native inflows
  - Return flows
  - Reasonably anticipated enhanced yield consistent with the Basin Optimization Plan
  - Opportunities for optimization by relocating Extraction and transmission of water
- **Rampdown Rate:** Deficit between the then-effective Operating Yield and the Basin Optimization Yield, divided by 15-years (2025 through 2039)
- **Sustainable Groundwater Management:** The management and use of groundwater in a manner that can be maintained during the planning and implementation horizon without causing Undesirable Results and Consistent with SGMA

Sustainable Groundwater Management

SUSTAINABILITY INDICATORS

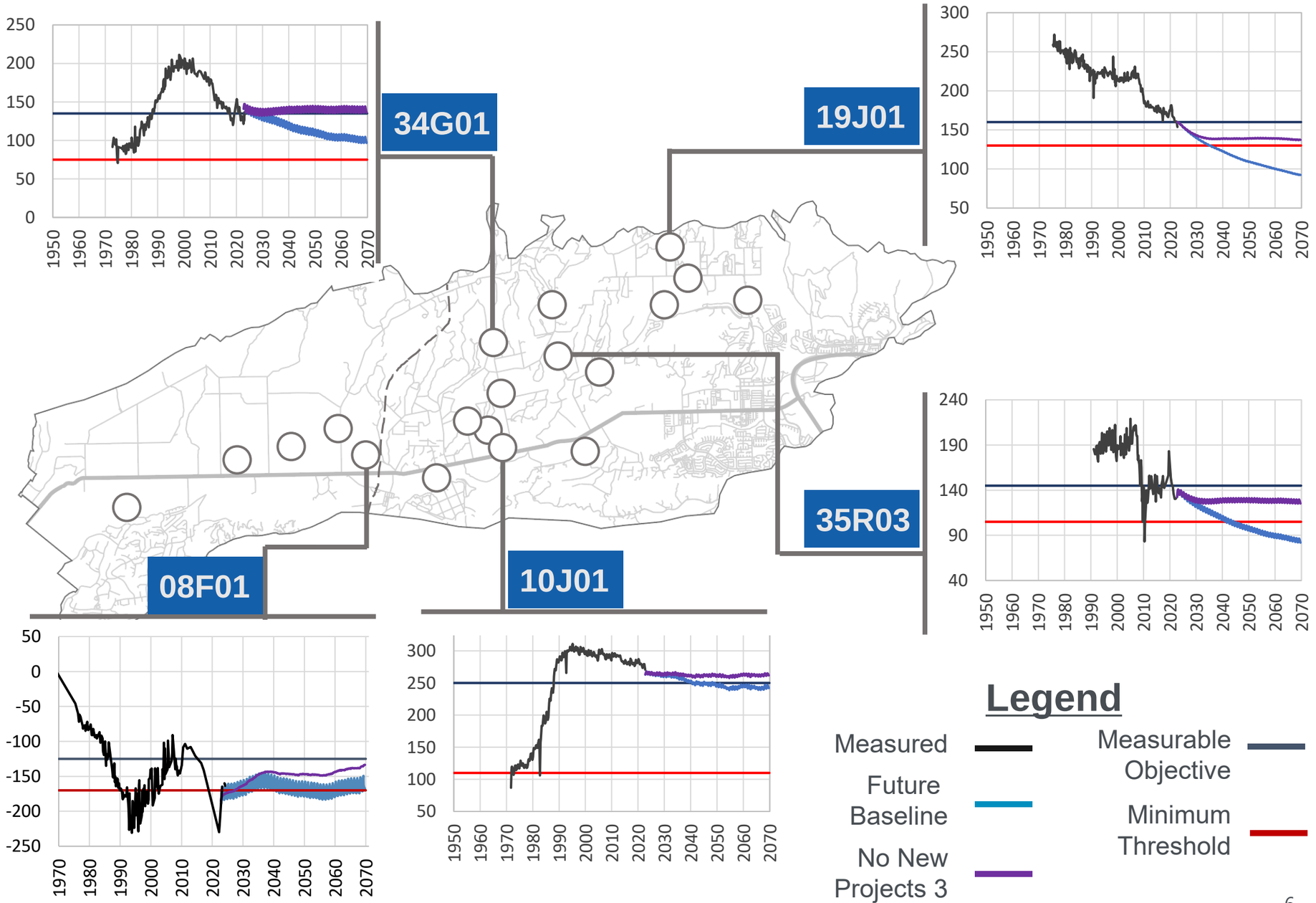
- Groundwater Elevation
- Groundwater in Storage
- Seawater Intrusion
- Groundwater Quality
- Land Subsidence
- Interconnected Surface Water and Groundwater



Projections from the 2025 LPV GSP Periodic Evaluation

Sustainable Management Criteria

- Avoids chronic lowering of groundwater levels across the LPVB
- Protects portions of the ELPMA where the Fox Canyon aquifer is susceptible to dewatering
- Supports sustainability in the adjacent Oxnard Subbasin



Data Source:

Sections 5.2.2, 5.2.3

(Draft LPVB GSP Evaluation)

Preliminary Model Results Subject to Change

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Modeling for the WLPMA

Updated Coastal Plain Model

- Numerical groundwater flow model developed and maintained by United Water Conservation District (UWCD 2018)
  - Most recently updated in 2024
- Calibrated to groundwater elevations measured between 1985 and 2022
- Used to characterize groundwater budgets, forecast future groundwater conditions, and estimate the sustainable yield
- Independent peer reviews characterized model uncertainty and appropriate use for the GSP

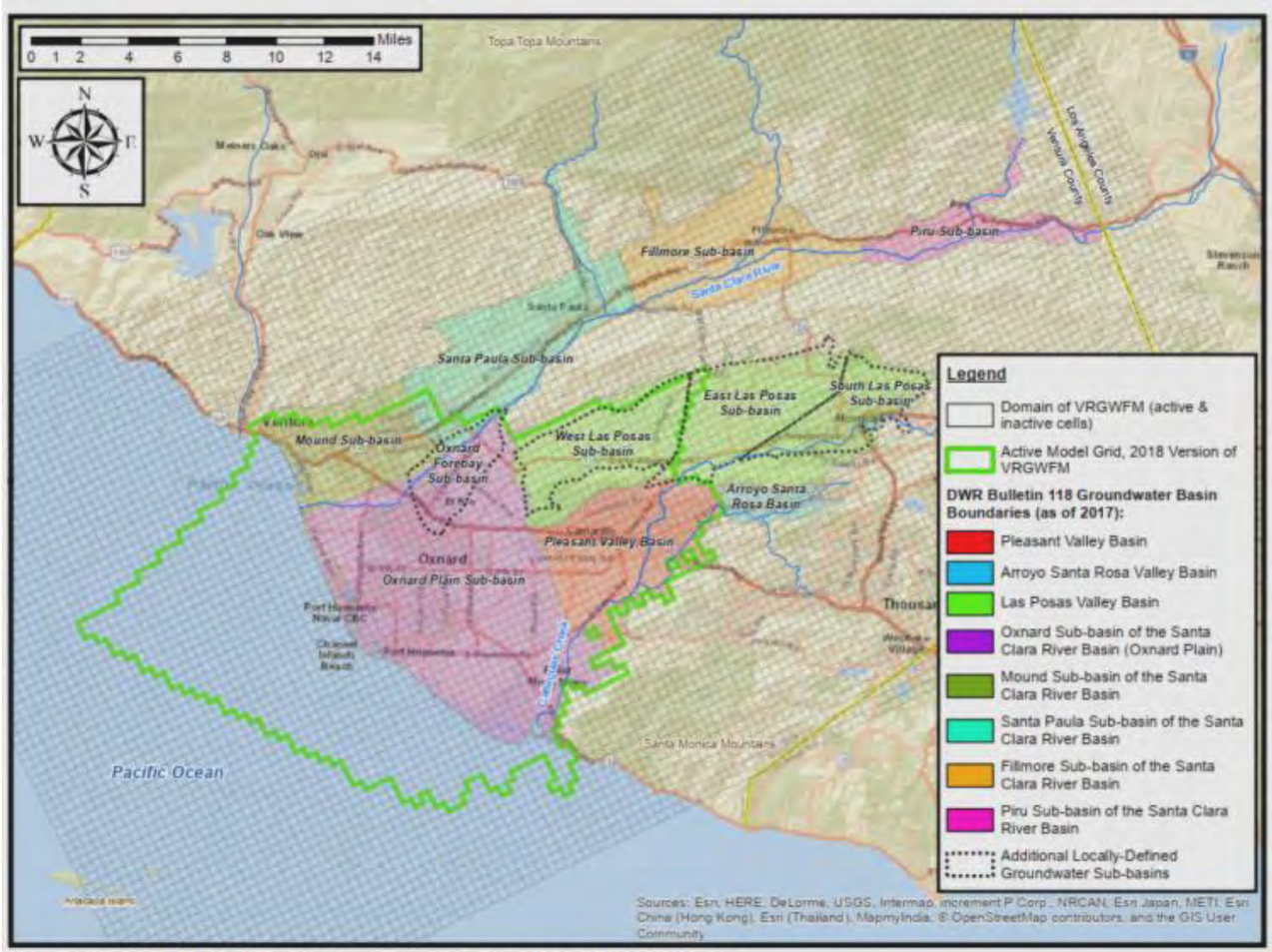


Figure 1-2. Ventura Regional Groundwater Flow Model (VRGWFM) Domain

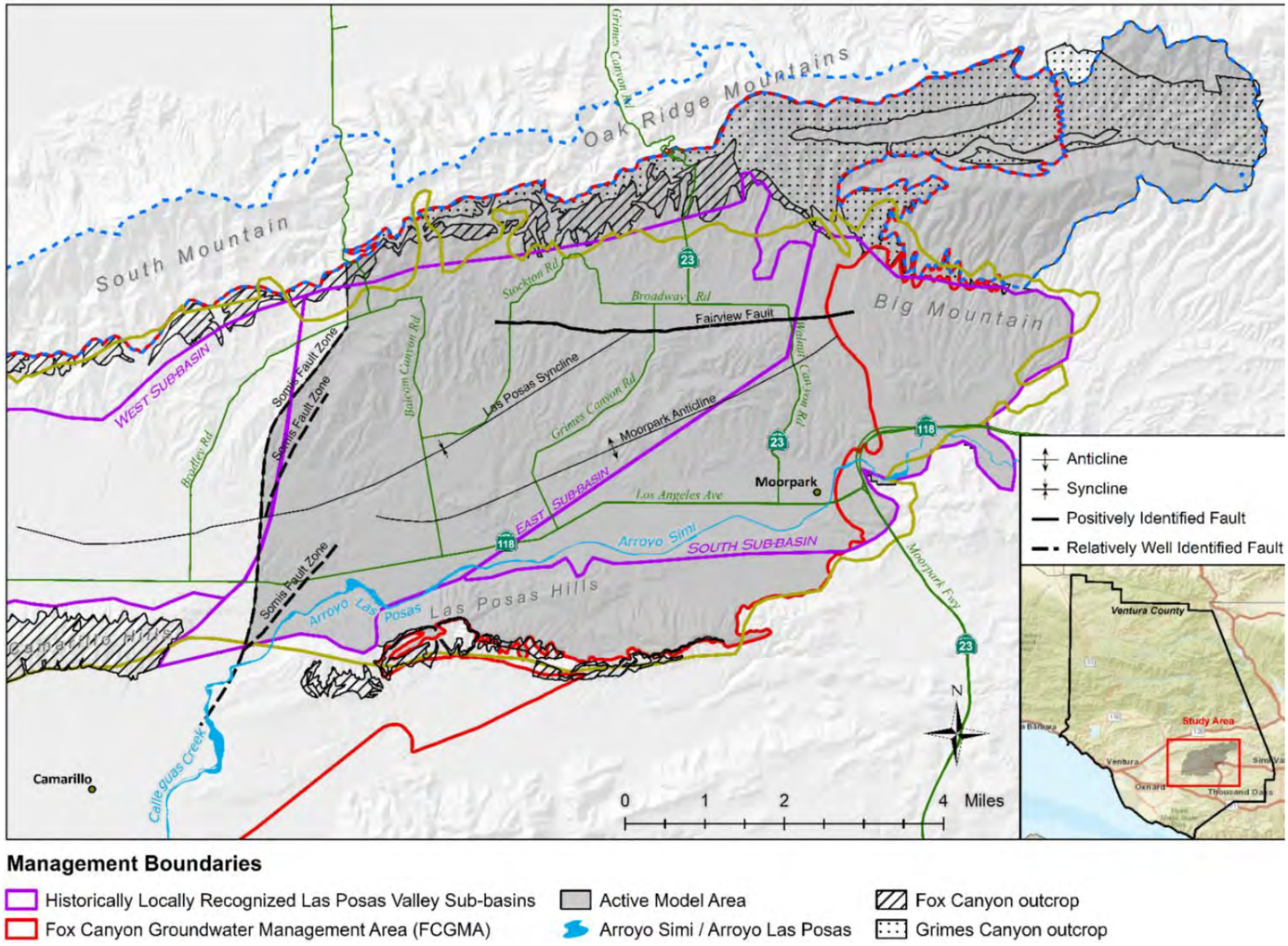
UWCD (United Water Conservation District). 2018. Ventura Regional Groundwater Flow Model and Updated Hydrogeologic Conceptual Model: Oxnard Plain, Oxnard Forebay, Pleasant Valley, West Las Posas, and Mound Groundwater Basins. Open-File Report 2018-02. July 2018.

WLPMA = West Las Posas Management Area

Modeling for the ELPMA

East Las Posas Model

- Numerical groundwater flow model developed by Calleguas Municipal Water District (CMWD 2018)
- Calibrated to groundwater elevations measured between 1970 and 2015
  - Validated using groundwater elevation measurements from 2016 through 2022
- Used to characterize groundwater budgets, forecast future groundwater conditions, and estimate the sustainable yield
- Independent peer reviews characterized model uncertainty and appropriate use for the GSP



CMWD (Calleguas Municipal Water District). 2018. Groundwater Flow Model of the East and South Las Posas Sub-Basins. Prepared by Intera Geoscience and Engineering Solutions. January 2018.

ELPMA = East Las Posas Management Area

Overview of Numerical Modeling Approach

Baseline Scenario

- Project groundwater conditions in the LPV Basin through 2069
- Groundwater Extractions equal to Water Year 2024 Operating Yield (e.g. 40,000 AFY)
- Include existing projects and/or programs

Projects Scenario

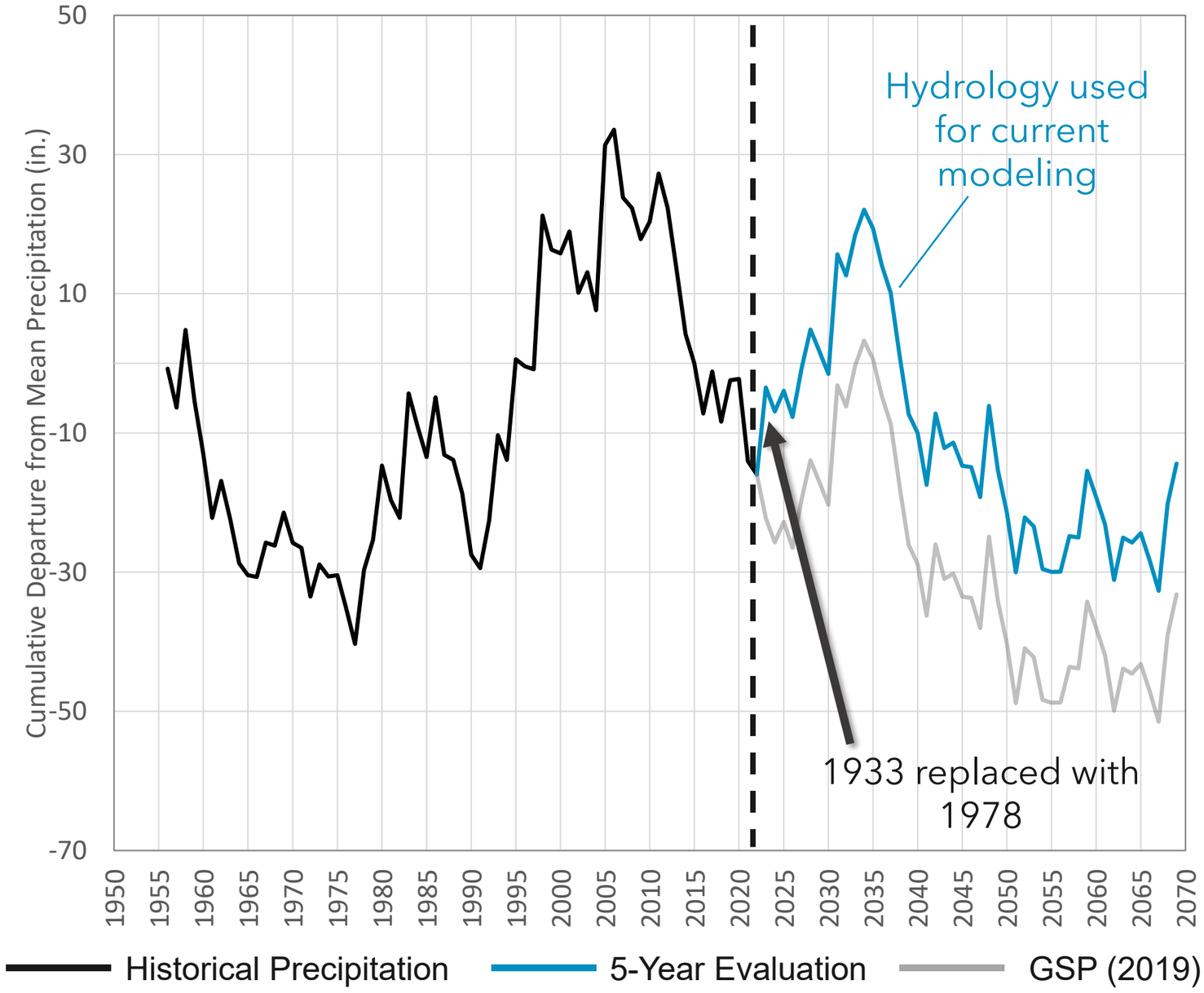
- Integrate Basin Optimization Projects
- Maintain Baseline scenario extractions
- Quantify the benefit of implementing Basin Optimization Projects

Alternative Pumping Scenario

- Simulate Rampdown to achieve Sustainable Groundwater Management by 2040
- Include the entire suite of Basin Optimization Projects

Simulation Time Period and Hydrology

- Time Period:
  - October 1, 2022 through September 30, 2069
- Hydrology:
  - 1933 – 1979 Hydrology, adjusted by DWR's 2070 climate change factors
  - 1933 replaced with 1978 to reflect the wet 2023 water year conditions
- Consistent with the assumptions used for the LPV GSP Periodic Evaluation



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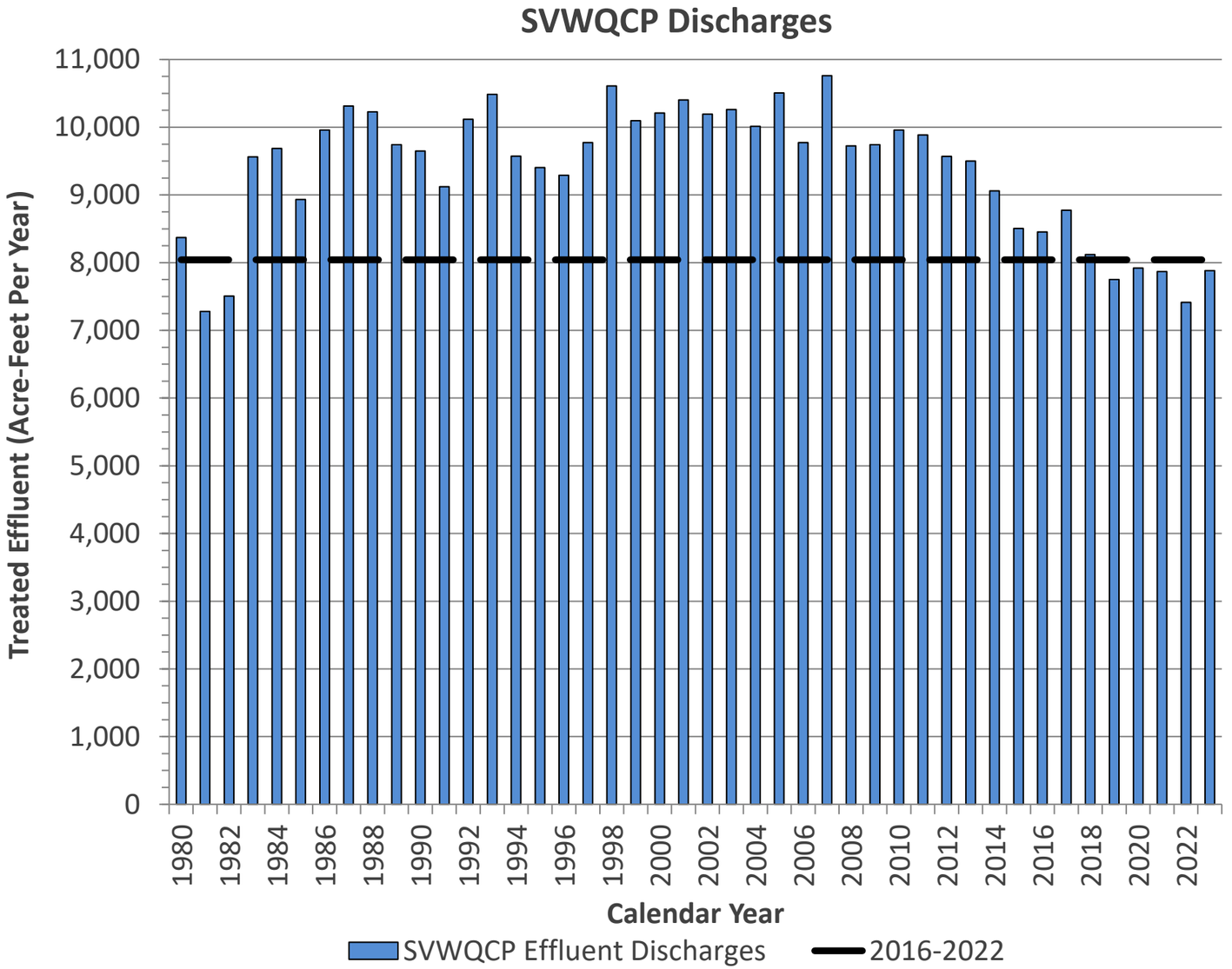
Groundwater Extractions

- Baseline Extractions equal to the Water Year 2024 Operating Yield
  - 40,000 AFY for the entirety of the LPV Basin
- Well by well extractions based on allocations and water use reporting
- When multiple wells are assigned to a single WMID, the pumping rate at each well will be set using the 2016-2022 reported pumping distributions for the respective WMID

Simi Valley Discharges

- Simi Valley Water Quality Control Plant
  - 2016 – 2022 average of 8,040 AFY
- Dewatering Well Discharges
  - 2016-2022 average of 1,318 AFY



WLPMA = West Las Posas Management Area

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Project Suite

LPV Basin Projects:

- Selected based on the DRAFT Basin Optimization Plan submitted to LPV PAC and TAC

OPV Projects:

- Entire project suite used in the No New Projects 3 Scenario for the 2025 LPV GSP Periodic Evaluation
- These projects will influence groundwater elevations in the WLPMA

Basin Optimization Projects

Project Name	BOP Project No.	Anticipated Water Supply (AFY)	Projected Offset Pumping Reduction (AFY)
Arroyo Simi Las Posas Water Acquisition	5	0*	0
Purchase of Imported water from CMWD for Basin Replenishment	2	1,762	1,762
Arroyo Simi-Las Posas Arundo Removal	1	2,680	0

*Water supply accounted for in Baseline assumptions

Arroyo Simi Las Posas Water Acquisition

Project Description:

- Purchase of recycled water from the City of Simi Valley to maintain Simi Valley Water Quality Control Plant discharges to Arroyo Simi-Las Posas

Simulation Approach

- Maintain Simi Valley Water Quality Control Plant and Dewatering Well discharges throughout the entire simulation period
- Baseline scenario assumes that discharges to Arroyo Simi-Las Posas will be constant throughout the 47-year simulation period
  - Assumption is based on Simi Valley's 2020 UWMP recycled water demand projects
- **Simulated flows in Arroyo Simi-Las Posas will be equal to the Baseline scenario**

Purchase of Imported Water from CMWD for Basin Replenishment

Project Description:

- Purchase of 1,762 AFY imported water from CMWD for use in lieu of groundwater in the WLPMA
- Limited to water purveyors with the ability to receive water from CMWD

Simulation Approach

- Reduce VCWWD-19 and ZMWC pumping in the WLPMA by 1,762
- Pumping reduction applied proportional to VCWWD-19 and ZMWC WLPMA extractions
  - Well by well reductions based on 2016 to 2022 average annual groundwater extraction distributions

Arroyo Simi Las Posas Arundo Removal Project

Project Description:

- Arundo donax removal from approximately 324 acres of land across the Arroyo-Simi Corridor
- Water savings of approximately 2,680 AFY

Simulation Approach

- Remove ET from the ELP Model domain along Arroyo Simi Las Posas corridor
- Increase flows in Arroyo Simi-Las Posas by 780 AFY
  - Difference between Water Savings estimate and reduction in ET losses from within the ELP Model domain.

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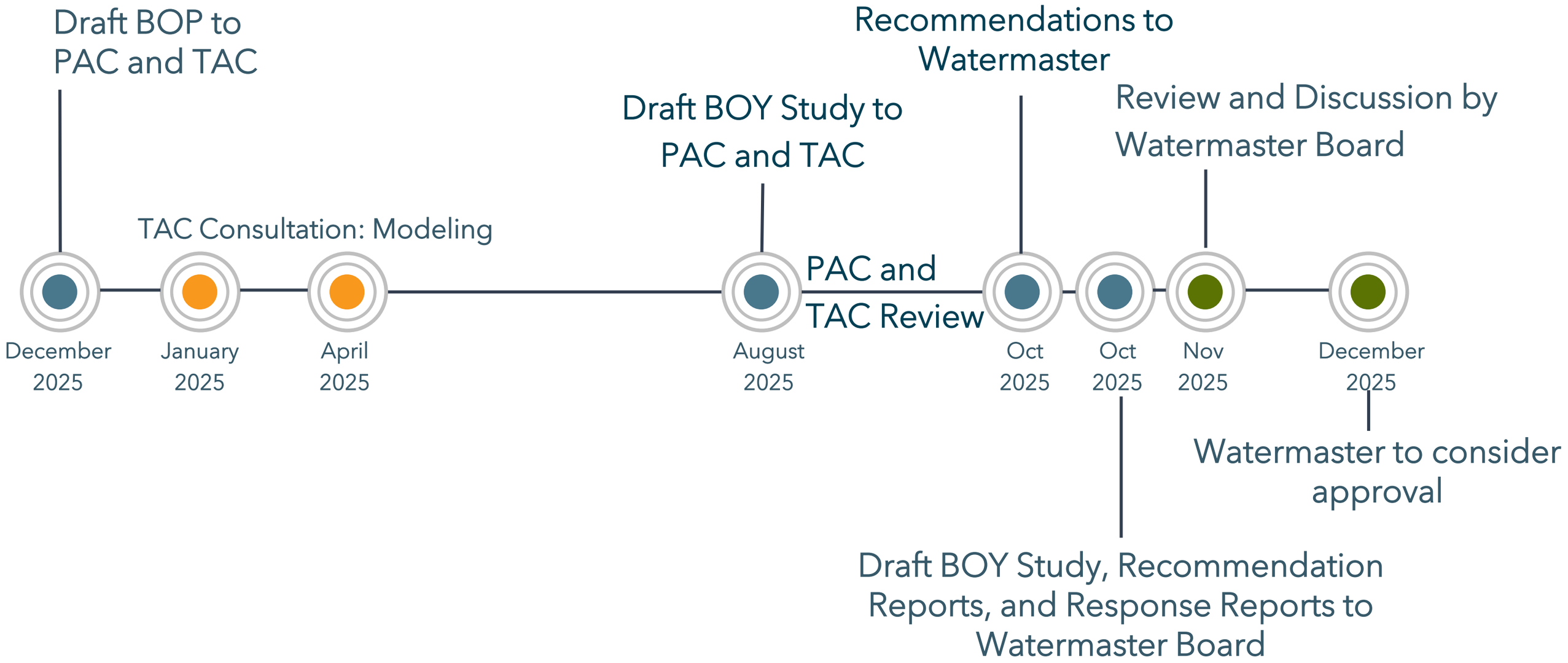
Tentative Timeline



*Schedule assumes United Water Conservation District provides FCGMA with modeling files and/or services to complete modeling for the WLPMA

Open Discussion

Attachment 2

Draft TAC Consultation Recommendation Report, Basin Optimization Yield Study Schedule, January 16, 2025

LAS POSAS VALLEY
TECHNICAL ADVISORY COMMITTEE

January 16, 2025

RECOMMENDATION REPORT

To: Las Posas Valley Watermaster

From: Las Posas Valley Watermaster Technical Advisory Committee, prepared by Chad Taylor, Administrator and Chair

Re: Recommendation Report – Basin Optimization Yield Study Schedule Consultation Request

The Las Posas Valley Watermaster Technical Advisory Committee (TAC) provides this Recommendation Report on the Basin Optimization Yield Study Schedule. The Las Posas Valley Basin Watermaster (Watermaster) requested TAC consultation on the Basin Optimization Yield Study (BOYS) schedule in a memorandum dated December 23, 2024. In that request, the Watermaster indicated that exigent circumstances have necessitated an extension of the schedule. The consultation request (attached) also indicated that the schedule assumed United Water Conservation District (UWCD) would provide the Watermaster access to an existing model and/or modeling services and presented brief identification of optional technical approaches to evaluating optimization of yield and rampdown requirements for the West Las Posas Management Area (WLMPA) in the event the UWCD model and/or modeling services were not available.

The TAC members reviewed and discussed the schedule and identified optional technical approaches for WLPMA optimization evaluation and discussed both in a meeting held on January 7, 2025. This Recommendation Report presents comments and recommendations on the proposed BOYS schedule.

Recommendations related to the optional approaches for WLPMA optimization evaluation identified by the Watermaster and Dudek are not included in this Recommendation Report. The TAC members agreed that the brief descriptions of these options in the consultation request were not sufficient for the TAC to provide specific feedback or recommend prioritization of the options. The TAC members did note that the schedule impacts identified for options 1 and 2 appeared reasonable, depending on the specific technical approach for each option. The schedule for option 3 could also be feasible but was aggressive. They also noted that option 3 would likely represent a significant expense.

The TAC would like to express their strong support for developing an agreement between the Watermaster and UWCD to use the existing Coastal Plain Model. It would be unfortunate if the landowners, groundwater users, and other stakeholders in the Las Posas

Valley Basin were forced to accommodate the time and expense required to create a new model. Especially as the new model would potentially disagree with the existing Coastal Plain Model.

Please note this Recommendation Report has been prepared to include the requirements conveyed in the October 29, 2024 memorandum from Watermaster staff titled *Recommendation Report Template*. While this report does not follow the template as provided, it does include all the required components.

TAC COMMENTS AND RECOMMENDATIONS

1. RECOMMENDATION 1: CONSIDER ADDING FLEXIBILITY IN THE SCHEDULE TO ALLOW FOR LONGER TAC REVIEW OF MODEL SIMULATION RESULTS

The schedule presented by the Watermaster includes TAC review in Task 1 – Model Scenario Development, Task 2 – Baseline and Project Scenario Numerical Modeling, and Task 4 – Draft BOYS. The review period for the Task 2 model scenario results is 21 days while the period for TAC and PAC review of the draft BOYS is 60 days. The TAC may require more time to review the model scenario results.

1.1 Recommendations:

Consider adding more time for TAC review of the Task 2 model scenario results. This time could overlap with other technical work to minimize potential schedule impacts.

1.2 Technical Rationale for Recommendation:

The BOYS is primarily a series of simulations using the models to analyze opportunities for optimizing yield of the Las Posas Valley Basin (LPVB) and quantify rampdown pumping reduction requirements (if necessary). The technical analyses included in the BOYS culminate with the evaluation of these model simulations and having a thorough technical review by the TAC will benefit the Watermaster. Should the time available for TAC review of model results be insufficient, the Watermaster and Dudek may receive comments on the draft BOYS report that require additional technical work that could have been completed prior to drafting the study documentation report. A thorough review by the TAC prior to preparation of the report would be more beneficial to the preparation of that report and maintenance of the overall schedule.

1.3 Summary of Facts in Support of Recommendation:

- The proposed schedule limits the time for TAC review of model results in Task 2 of the BOYS to 21 days
- The model scenario results are the primary technical component of the BOYS
- Timely and thorough TAC review at this stage of the BOYS is likely benefit the overall schedule by identifying and conveying recommendations prior to preparation of the BOYS documentation report

TALLY OF COMMITTEE MEMBER VOTES

[this section will be modified as necessary following discussion and voting by the TAC]

TAC Member	Vote			
	Yes	No	Abstain	Absent
Chad Taylor, Chair				
Tony Morgan, East LPV Representative				
Bob Abrams, West LPV Representative				

REPORT OF BASES FOR MAJORITY AND MINORITY COMMITTEE MEMBER POSITIONS

The TAC vote to present the recommendations above to the Watermaster was unanimous, as indicated above. The bases for the unanimous positions are described for each recommendation above. [this will be modified as necessary following discussion and voting by the TAC]

Attachment 1

Committee Consultation Request –Basin Optimization Yield Study Schedule

FOX CANYON GROUNDWATER MANAGEMENT AGENCY

LAS POSAS VALLEY WATERMASTER

MEMORANDUM

To: Las Posas Valley Technical Advisory Committee

From: Kudzai F. Kaseke, Assistant Groundwater Manager

Date: December 23, 2024

RE: Basin Optimization Yield Study Schedule

Dear Las Posas Valley Technical Advisory Committee Members:

Section 4.10 of the judgment entered in *Las Posas Valley Water Rights Coalition, et al. v. Fox Canyon Groundwater Management Agency, et al.*, Santa Barbara Sup. Ct. Case No. VENCI000509700 (Judgment) requires the Watermaster to prepare a Basin Optimization Yield Study (BOYS), which will set the Basin Optimization Yield for the Las Posas Valley Basin (LPV Basin), and in turn the Operating Yield and the Rampdown Rate for Water Years through Water Year 2039. (Judgment, § 4.10.1.4.)

Exigent circumstances necessitate an extension of the schedule included in the Judgment, originally and as amended, for preparation of the BOYS. Currently, Watermaster estimates completion of the BOYS, consistent with the committee consultation required by the Judgment and inclusive of additional consultation requested by the LPV Technical Advisory Committee, by the end of December 2025. Watermaster's revised schedule for completion of the BOYS, including dates for completion of specific tasks and work, is attached as Exhibit A. Pursuant to Section 6.3 of the Judgment, Watermaster requests Committee Consultation with the Las Posas Valley Technical Advisory Committee (TAC), including specifically TAC's technical recommendations and comments, on the revised schedule for preparation of the BOYS as set forth in Exhibit A.

The revised schedule for preparation of the BOYS assumes United Water Conservation District (UWCD) provides Watermaster access to certain model(s) and/or modeling services. If Watermaster is unable to obtain access to UWCD's model(s) and/or modeling services, Watermaster must rely on alternative model(s) and/or technical services to characterize future groundwater conditions within the West Las Posas Management Area (WLPMA) and complete preparation of the BOYS. Watermaster has asked its professional consultant, Dudek, to identify options for developing or obtaining replacement model(s) and/or modeling services. Dudek has prepared the following alternatives to obtaining UWCD model(s) and/or modeling services:

1. **Estimation of Basin Optimization Yield and Rampdown Using GSP Evaluation Model Simulations**
    a. This alternative would utilize model results presented in the LPV Groundwater Sustainability Plan (GSP) Periodic Evaluation and may require additional technical analyses to characterize the impacts of allocation distributions on the WLPMA yield.
    b. Estimated Schedule Impacts: Additional 3 to 6 months to the schedule set forth in Exhibit A.

2. **Estimation of Basin Optimization Yield and Rampdown Using Historical Groundwater Elevation Measurements and Extraction Reports**
    a. This alternative would consider the relationship between groundwater levels and pumping to estimate the WLPMA yield.
    b. Estimated Schedule Impacts: Additional 3 to 6 months to the schedule set forth in Exhibit A.

3. **Development of a New Numerical Groundwater Flow Model for the West Las Posas Management Area**
    a. This approach would cover the development of a new model for the WLPMA that is distinct from UWCD's Updated Coastal Plain Model. The model would be developed and maintained by FCGMA.
    b. Estimated Schedule Impacts: Additional 18 to 24 months to the schedule set forth in Exhibit A.

Pursuant to Section 6.3 of the Judgment, Watermaster requests Committee Consultation with TAC, including specifically TAC's technical recommendations and comments, on each of the above alternatives and the additional amounts of time to be added to the revised schedule for preparation of the BOYS as set forth in Exhibit A.

Watermaster requests TAC's Recommendation Report, including its technical recommendations and comments, on the Committee Consultation requests discussed in this memorandum by January 31, 2025.

Please contact me at (805) 654-2010 or LPV.Watermaster@ventura.org with any questions or concerns.

Basin Optimization Yield Study Schedule

Description	Duration (days)	Date
Draft scope of work & budget for study referred to TAC		7/16/2024
PAC & TAC Recommendation Reports to Watermaster	42	8/27/2024
Watermaster Board direction on TAC recommendations / response reports & approval of SOW and budget	57	10/23/2024
Draft Basin Optimization Plan completed	47	12/9/2024
Development of the draft BOY Study[1]		
UWCD Model File Submittal[2]		1/1/2025
Task 1 - Model Scenario Development[3]	29	1/7/2025
TAC Recommendation Report	14	1/21/2025
Watermaster Response Report	14	2/4/2025
Recommendation & Response Reports discussed by WM Board at special meeting.	10	2/14/2025
Task 2 - Numerical Modeling		
Task 2.1 - Baseline Scenario	21	2/25/2025
Task 2.2 - Projects Scenario	28	3/25/2025
TAC review of Baseline and Projects for 4/1/25 TAC meeting	7	4/1/2025
TAC Recommendation Report	21	4/22/2025
Watermaster Response Report	21	5/13/2025
Recommendation & Response Reports discussed by WM Board	15	5/28/2025
Task 2.3 - Model Alternative Pumping Scenarios	30	6/27/2025
Task 4 - Basin Optimization Yield Study		
Task 4.1 - Draft BOY Study	45	8/11/2025
PAC & TAC Recommendation Reports	60	10/10/2025
Watermaster Response Report & revised draft BOY Study	21	10/31/2025
Recommendation & Response Reports discussed by WM Board, Board provides direction on revised draft BOY Study	8	11/8/2025
Task 4.2 - Final BOY Study development following Watermaster Board review	28	12/6/2025
Watermaster Board approval of final BOY Study	6	12/12/2025
Total Days from Authorization to Proceed:	415	

Attachment 3

Draft TAC Consultation Recommendation Report, Basin Optimization Yield Study Modeling Approach, January 16, 2025

LAS POSAS VALLEY
TECHNICAL ADVISORY COMMITTEE

January 16, 2025

RECOMMENDATION REPORT

To: Las Posas Valley Watermaster

From: Las Posas Valley Watermaster Technical Advisory Committee, prepared by Chad Taylor, Administrator and Chair

Re: Recommendation Report – Basin Optimization Yield Study Modeling Approach Consultation Request

The Las Posas Valley Watermaster Technical Advisory Committee (TAC) provides this Recommendation Report on the Basin Optimization Yield Study Modeling Approach. The Las Posas Valley Basin Watermaster (Watermaster) groundwater consultant Dudek presented the planned approach to modeling for the Basin Optimization Yield Study (BOYS) to the TAC in a meeting held on January 7, 2024. The slides from that presentation are attached to this Recommendation Report.

The TAC discussed the presented approach in the January 7, 2024 meeting and provided feedback to Watermaster staff and Dudek. The comments and recommendations discussed in that meeting are presented in this Recommendation Report.

Please note this Recommendation Report has been prepared to include the requirements conveyed in the October 29, 2024 memorandum from Watermaster staff titled *Recommendation Report Template*. While this report does not follow the template as provided, it does include all the required components.

TAC RECOMMENDATIONS

1. RECOMMENDATION 1: CONSIDER ITERATIVELY ADJUSTING IN LIEU DELIVERIES WHEN SIMULATING PROJECTS THAT SUPPLY ALTERNATIVE WATER SUPPLIES TO SPECIFIC AREAS OF THE BASIN

The TAC members noted in their review of the draft Basin Optimization Plan and the modeling approach presentation that simulation of the project that proposes in lieu water deliveries to reduce localized groundwater dependence (Project 2: Purchase of Imported Water from Callegaus Municipal Water District for Basin Replenishment) is planned to apply a predefined volume of annual delivery. TAC members hope that multiple simulations can be undertaken to assess the volume of in lieu delivery that would be required to achieve sustainability in the project area.

1.1 Recommendations:

To reduce the number of model simulation iterations required to identify the volume of in lieu delivery that would achieve local sustainability the TAC recommends the following:

1. Consider estimating the approximate amount of in-lieu water needed to avoid Minimum Threshold (MT) exceedances in the West Las Posas Management Area (WLPMA) pumping depression through analysis of historical pumping, groundwater storage, and groundwater levels in the depression area.
2. Use the result for as a starting point simulating varying in-lieu volumes until the minimum volume necessary to avoid undesirable results in the WLPMA pumping depression is identified.
3. Use the average annual volume of in lieu delivery identified in step 2 in management area-wide simulations that include other projects as described in the Dudek presentation.

If iterative model simulations are not possible due to budget and/or schedule restrictions, the estimate based on historical groundwater conditions analyses from step 1 above could be used in step 3.

1.2 Technical Rationale for Recommendation:

The proposed area for Project 2 includes the WLPMA pumping depression that recent Annual Reports and the 5-Year Groundwater Sustainability Plan (GSP) Periodic Evaluation identified as an area of concern. Reliance on groundwater for water supply in this area is the likely cause of this localized depression and maximizing local pumping reductions is likely necessary to achieve sustainability as defined in the GSP and Judgment.

TAC members with knowledge of Callegaus Municipal Water District (CMWD) plans and operations indicated there may be more water available for in lieu delivery for Project 2 than indicated in slide 18 of the attached presentation. To optimize yield in the Las Posas Valley Basin (LPVB), limit basin-wide rampdown pumping reductions, and maximize the benefits of rampdown projects that propose to deliver alternative supplies of water should maximize the use of available water and/or supply water at a volume and rate that avoids local undesirable results whenever possible. Simulating predetermined volumes of in lieu delivery tests the effect of delivering the specified volumes but does not necessarily optimize yield from the LPVB.

If the volume of water delivered for in lieu use is not maximized or right-sized to address local pumping depressions, then the TAC assumes recovery will require management area-wide rampdown pumping reductions. However, spreading a groundwater budget deficit out over an entire management area may not effectively address local pumping depression conditions.

This approach to addressing localized groundwater elevation / pumping depressions by offsetting groundwater use through identifying the appropriate volume of in lieu delivery could also be used in other parts of the LPVB.

1.3 Summary of Facts in Support of Recommendation:

- Persistent groundwater elevation / pumping depressions have caused local exceedances of sustainability thresholds (MTs)
- Reversal of local pumping depressions typically requires either reduced pumping or increased recharge in the area of the depression(s)
- Identification of the volume of water required to offset local undesirable conditions would allow in lieu projects to be sized to maximize benefits

2. RECOMMENDATION 2: INCLUDE IN LIEU DELIVERIES TO NORTHERN EAST LAS POSAS MANAGEMENT AREA (DBOP PROJECT 7) IN MODELING APPROACH

The TAC recommends including the project described in the dBOP as In Lieu Deliveries to Northern East Las Posas Management Area Feasibility Study (Project 7) in the project model scenario. In discussing the project ranking in the dBOP, TAC member Bryan Bondy indicated that this project could be considered as feasible as Project 2 referenced above and should be included in the with project modeling for the BOYS. Specifically, Mr. Bondy indicated that the infrastructure to deliver in lieu water to the northern East Las Posas Management Area (ELMPA) exists within the local Waterworks district and there is likely water available for in lieu delivery in all but the most extreme drought years. A recommendation revise how this project is described in the BOP will be presented in the related Recommendation Report.

2.1 Recommendations:

The TAC recommends that modeling Project 7 from the dBOP be included in the BOYS. Modeling this project should be approached as described for dBOP Project 2 in the preceding comment. Specific details of locations of in lieu deliveries and available volumes should be coordinated with the Waterworks District.

2.2 Technical Rationale for Recommendation:

This is an area of the LPVB that has exhibited historical groundwater elevation declines that locally exceed 250 feet and groundwater elevation trends differ from other areas of the ELPMA. This implies that the area is not well connected to recharge from the Arroyo Simi-Las Posas, so regional projects to increase recharge are unlikely to benefit the norther ELPMA.

The infrastructure and alternative water supply required to provide in lieu water to the norther ELPMA exist and are likely available. The maximum volume of water that could be delivered for in lieu use could be roughly identified for modeling purposes by coordinating with the local Waterworks District. Modeling could then proceed using an iterative optimization approach as described in Recommendation 1 above.

2.3 Summary of Facts in Support of Recommendation:

- The northern ELPMA has historically exhibited significant groundwater elevation declines
- Groundwater elevations in the ELPMA indicate that the area is not well connected to regional recharge from the Arroyo Simi-Las Posas

- A local approach to addressing water level declines in this area is necessary to achieve sustainability
- An in lieu project could be modeled with rough estimates of in lieu water availability and application locations using an iterative approach to optimize benefits

3. RECOMMENDATION 3: TRACK AND REPORT CHANGES IN OUTFLOW TO PLEASANT VALLEY BASIN FOR ALL SIMULATIONS

The proposed model simulations have the potential to increase outflow to the Pleasant Valley Basin and comparison to baseline conditions should specifically track this component of the water budget.

3.1 Recommendations:

To track differences in outflow to the Pleasant Valley Basin the surface water and groundwater components of the simulated water budget for each model scenario should be compared to identify changes in outflow.

3.2 Technical Rationale for Recommendation:

Projects that include increased flow in the Arroyo Simi-Las Posas and/or increase groundwater elevations in the western portion of the ELPMA have the potential to increase the length or duration of flow in the waterway. This could result in increased outflow from LPVB to Pleasant Valley Basin. Tracking changes in outflow along this basin boundary will help balance the benefits of proposed projects to the LPVB and could provide opportunities for regional coordination.

3.3 Summary of Facts in Support of Recommendation:

- Projects that increase flow in Arroyo Simi-Las Posas or increase groundwater elevations in western ELPMA have the potential to increase the length or duration of flow in the waterway
- Unexpected increases in outflow from the LPVB resulting from projects could indicate reduced project benefits to the basin

4. RECOMMENDATION 4: USE RECENT HISTORICAL TRENDS IN MOORPARK WATER RECLAMATION FACILITY PERCOLATION RATES TO DEVELOP MODEL INPUTS

Percolation of water discharged from the Moorpark Water Reclamation Facility (WRF) has changed significantly in the recent past and these trends should be reflected in predictive model simulations.

4.1 Recommendations:

- Review historical changes in Moorpark WRF percolation discharge and incorporate recent conditions and trends in model inputs for simulating future conditions
- Provide proposed model inputs for this water budget component to the TAC for consultation

4.2 Technical Rationale for Recommendation:

Moorpark WRF discharges to percolation rose from the early 1980s to the early 2000s but have since declined. If predictive model simulations use the entire historical record to represent future conditions, they will likely overestimate groundwater recharge from this source.

4.3 Summary of Facts in Support of Recommendation:

- Moorpark WRF discharges to percolation rose from the early 1980s to the early 2000s but have since declined.
- Predictive model simulations that use the full historical record to represent future conditions will likely overestimate groundwater recharge from this source.

5. RECOMMENDATION 5: CONSIDER ASSESSING EFFECTS OF VARIABLE PUMPING REDUCTION ACROSS THE BASIN

Should rampdown pumping reductions be necessary, the Judgment requires equal reductions throughout the LPVB without consideration for local conditions relating to sustainability. This approach may not address local undesirable results.

5.1 Recommendations:

If rampdown pumping reductions are necessary, consider model simulations that focus pumping reductions in the areas of undesirable results.

5.2 Technical Rationale for Recommendations

In the event optimization modeling shows that application of planned projects does not address undesirable results throughout the LPVB, Dudek and the Watermaster have indicated they will apply pumping reductions basin-wide according to the allocation categories in the Judgment. However, there are areas of the LPVB that are either disconnected from or poorly connected to other areas. Reducing pumping in an area with no undesirable results that is not connected to areas with undesirable results is unlikely to address conditions in the area with undesirable results. Iteratively reducing pumping basin-wide is likely to result in larger than necessary total reductions in pumping when compared to targeted reductions.

The TAC recognizes that the Judgment does not allow for geographic variation in rampdown pumping reductions. However, this exercise could help the Watermaster identify the volumes of supplemental water necessary to address local undesirable conditions and thereby target future project development.

5.3 Summary of Facts in Support of Recommendations

- Undesirable results are not equally distributed in the LPVB
- Uniform reductions in pumping basin-wide are likely to require a larger total reduction in pumping to achieve localized benefits than would targeted pumping changes

6. RECOMMENDATION 6: CONSIDER RUNNING ADDITIONAL SIMULATIONS FOR WLPMA WITH THE OXNARD EXTRACTION BARRIER BRACKISH WATER TREATMENT PROJECT

The Oxnard Extraction Barrier Brackish Water Treatment project could have significant impact to water levels in the WLPMA. For long term planning and rampdown estimates this would be important to understand and include in the BOYS analyses.

This is a lower priority than the preceding recommendations.

6.1 Recommendations:

Consider developing an alternate set of model simulations for WLPMA that include the Oxnard Extraction Barrier Brackish Water Treatment project.

6.2 Technical Rationale for Recommendation:

The proposed project could affect water levels in the WLPMA and assessment of the impacts on requirements for project implementation and/or rampdown in WLPMA should be assessed.

6.3 Summary of Facts in Support of Recommendation:

The Oxnard Extraction Barrier Brackish Water Treatment project may be pursued in the future and could impact sustainability in WLPMA.

TALLY OF COMMITTEE MEMBER VOTES

[this section will be modified as necessary following discussion and voting by the TAC]

TAC Member	Vote			
	Yes	No	Abstain	Absent
Chad Taylor, Chair				
Tony Morgan, East LPV Representative				
Bob Abrams, West LPV Representative				

REPORT OF BASES FOR MAJORITY AND MINORITY COMMITTEE MEMBER POSITIONS

The TAC vote to present the recommendations above to the Watermaster was unanimous, as indicated above. The bases for the unanimous positions are described for each recommendation above. [this will be modified as necessary following discussion and voting by the TAC]

Attachment 1

LPV Basin Optimization Yield Study – Modeling Approach presentation, January 2024, presented by Dr. Trevor Jones

Fox Canyon Groundwater Management Agency

LPV Basin Optimization Yield Study – Modeling Approach

TREVOR JONES
DUDEK

JANUARY 2024

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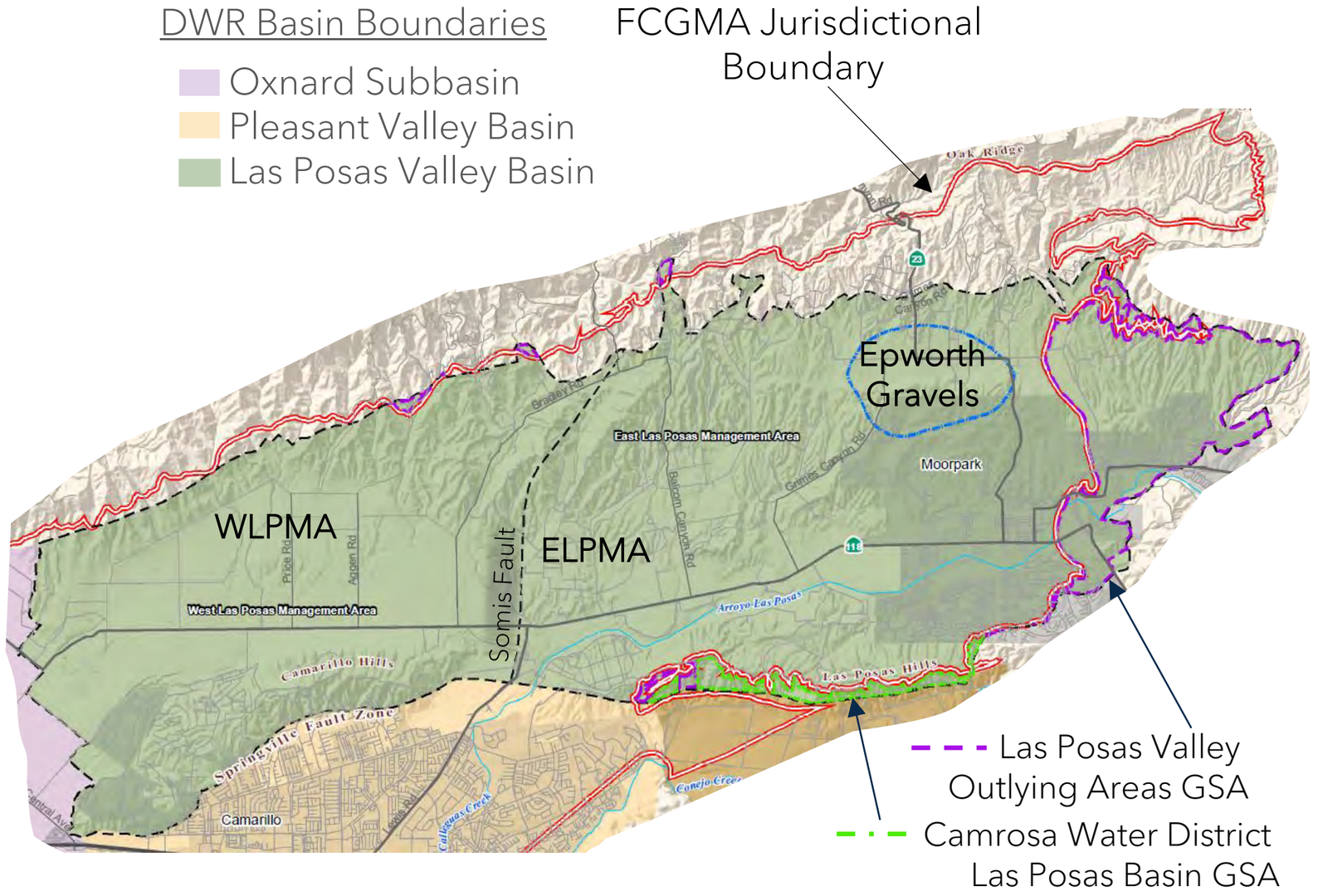
LPV Basin Optimization Yield Study

- **Objective:** Quantify the Basin Optimization Yield and Rampdown Rate for the LPV Basin
- **Basin Optimization Yield:** the estimated yield that is projected to be available to achieve Sustainable Groundwater Management by 2040. Accounts for water available from:
  - Native inflows
  - Return flows
  - Reasonably anticipated enhanced yield consistent with the Basin Optimization Plan
  - Opportunities for optimization by relocating Extraction and transmission of water
- **Rampdown Rate:** Deficit between the then-effective Operating Yield and the Basin Optimization Yield, divided by 15-years (2025 through 2039)
- **Sustainable Groundwater Management:** The management and use of groundwater in a manner that can be maintained during the planning and implementation horizon without causing Undesirable Results and Consistent with SGMA

Sustainable Groundwater Management

SUSTAINABILITY INDICATORS

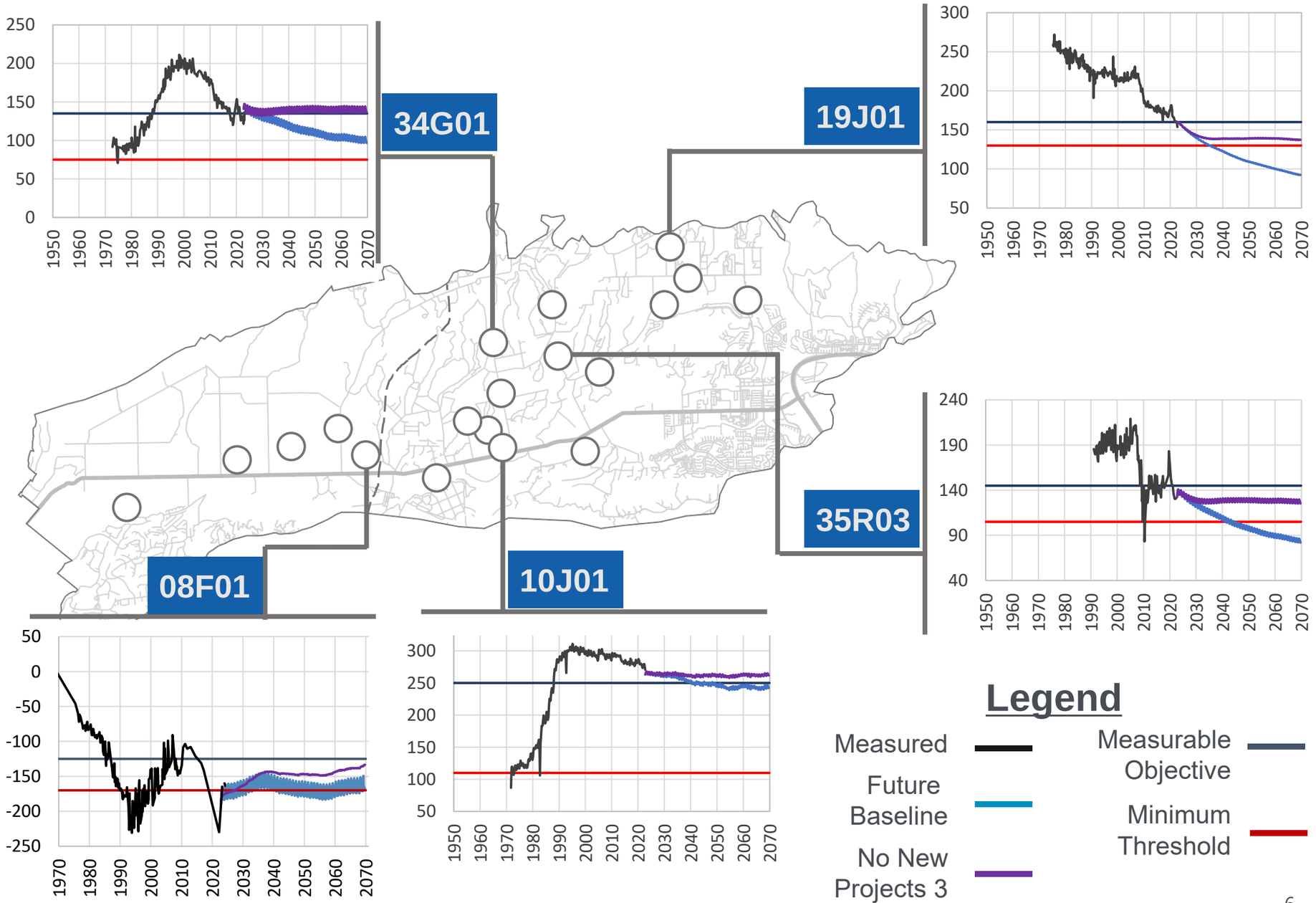
- Groundwater Elevation
- Groundwater in Storage
- Seawater Intrusion
- Groundwater Quality
- Land Subsidence
- Interconnected Surface Water and Groundwater



Projections from the 2025 LPV GSP Periodic Evaluation

Sustainable Management Criteria

- Avoids chronic lowering of groundwater levels across the LPVB
- Protects portions of the ELPMA where the Fox Canyon aquifer is susceptible to dewatering
- Supports sustainability in the adjacent Oxnard Subbasin



Data Source:

Sections 5.2.2, 5.2.3

(Draft LPVB GSP Evaluation)

Preliminary Model Results Subject to Change

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Modeling for the WLPMA

Updated Coastal Plain Model

- Numerical groundwater flow model developed and maintained by United Water Conservation District (UWCD 2018)
  - Most recently updated in 2024
- Calibrated to groundwater elevations measured between 1985 and 2022
- Used to characterize groundwater budgets, forecast future groundwater conditions, and estimate the sustainable yield
- Independent peer reviews characterized model uncertainty and appropriate use for the GSP

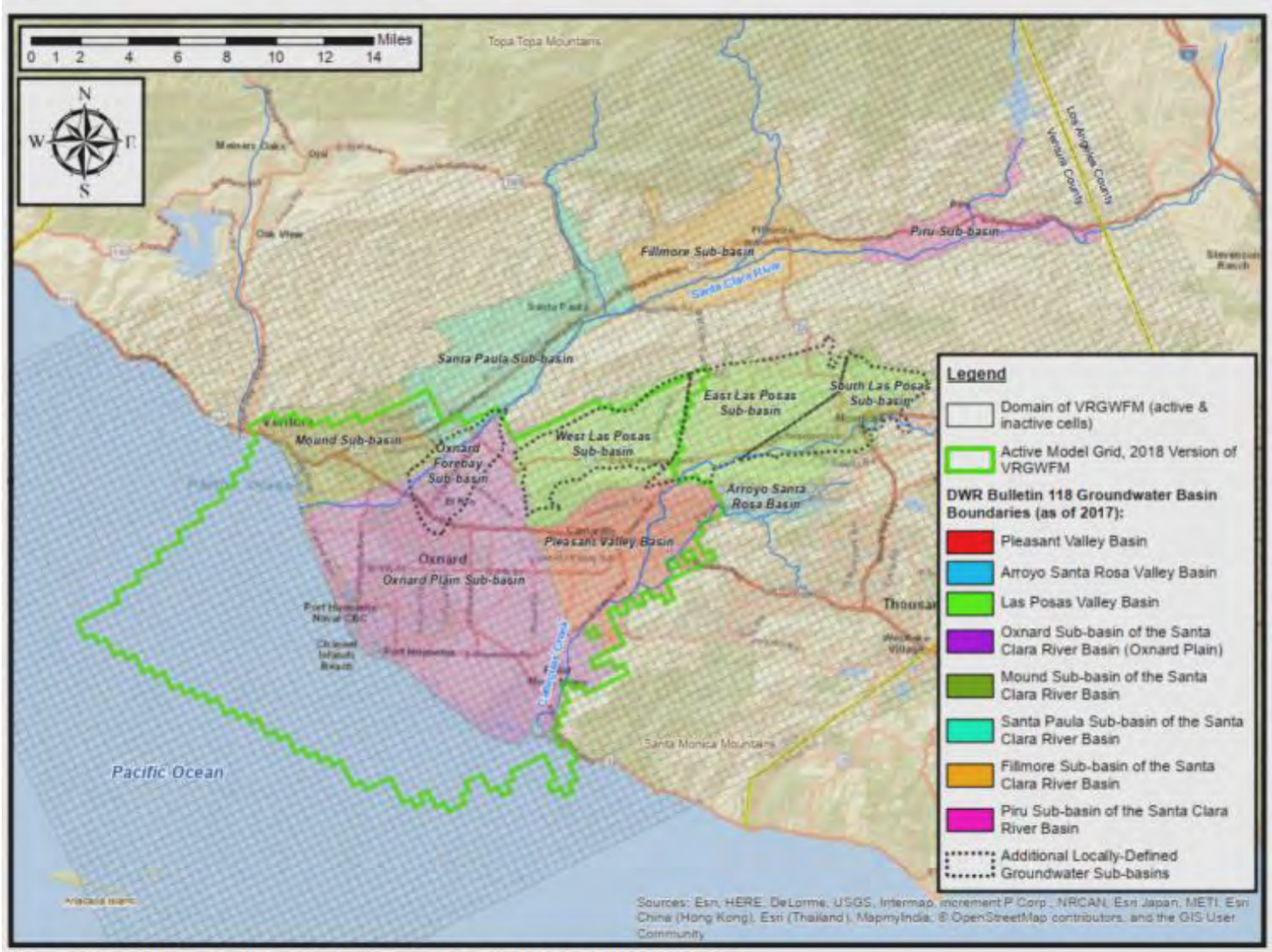


Figure 1-2. Ventura Regional Groundwater Flow Model (VRGWFM) Domain

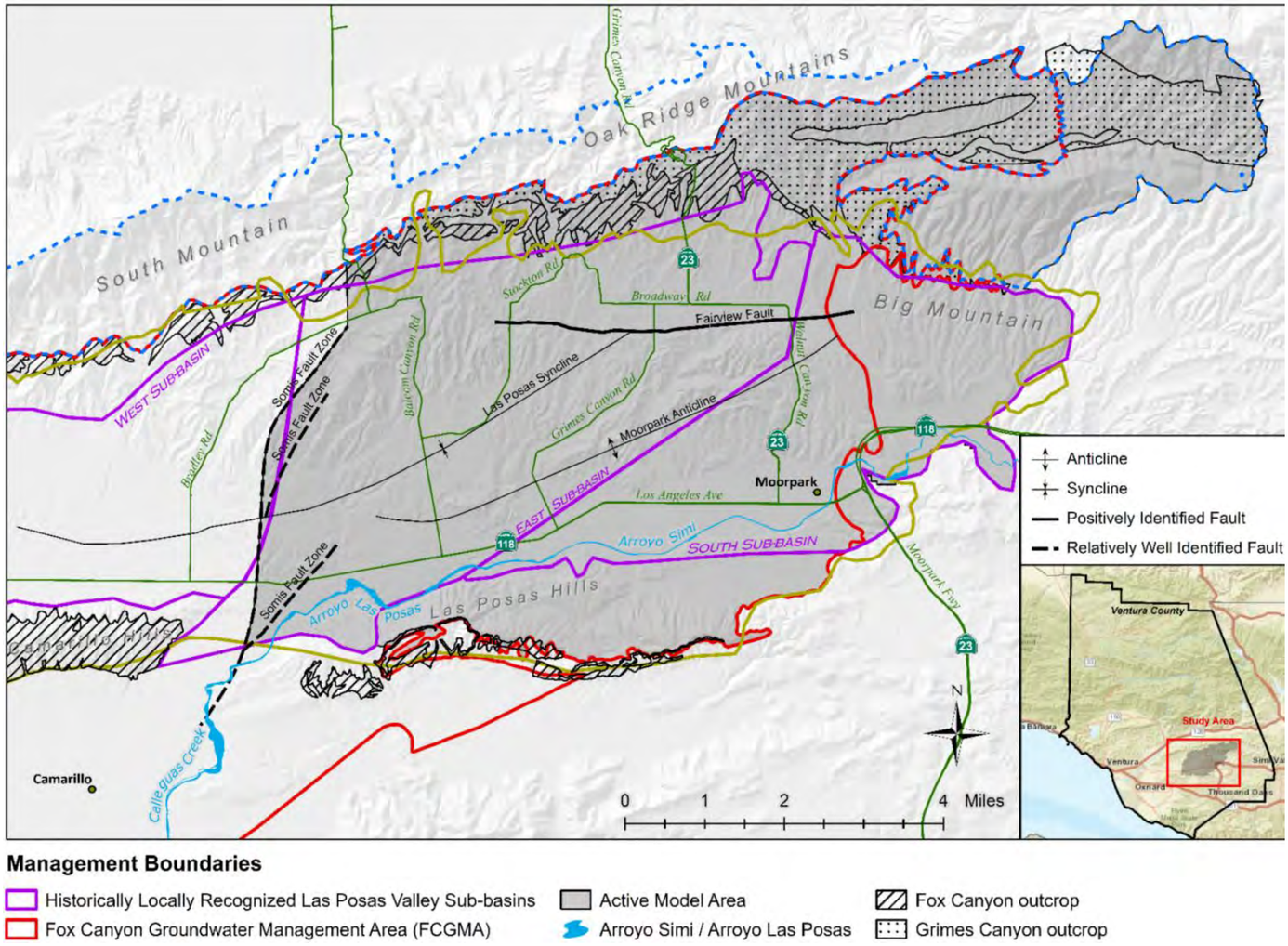
UWCD (United Water Conservation District). 2018. Ventura Regional Groundwater Flow Model and Updated Hydrogeologic Conceptual Model: Oxnard Plain, Oxnard Forebay, Pleasant Valley, West Las Posas, and Mound Groundwater Basins. Open-File Report 2018-02. July 2018.

WLPMA = West Las Posas Management Area

Modeling for the ELPMA

East Las Posas Model

- Numerical groundwater flow model developed by Calleguas Municipal Water District (CMWD 2018)
- Calibrated to groundwater elevations measured between 1970 and 2015
  - Validated using groundwater elevation measurements from 2016 through 2022
- Used to characterize groundwater budgets, forecast future groundwater conditions, and estimate the sustainable yield
- Independent peer reviews characterized model uncertainty and appropriate use for the GSP



CMWD (Calleguas Municipal Water District). 2018. Groundwater Flow Model of the East and South Las Posas Sub-Basins. Prepared by Intera Geoscience and Engineering Solutions. January 2018.

ELPMA = East Las Posas Management Area

Overview of Numerical Modeling Approach

Baseline Scenario

- Project groundwater conditions in the LPV Basin through 2069
- Groundwater Extractions equal to Water Year 2024 Operating Yield (e.g. 40,000 AFY)
- Include existing projects and/or programs

Projects Scenario

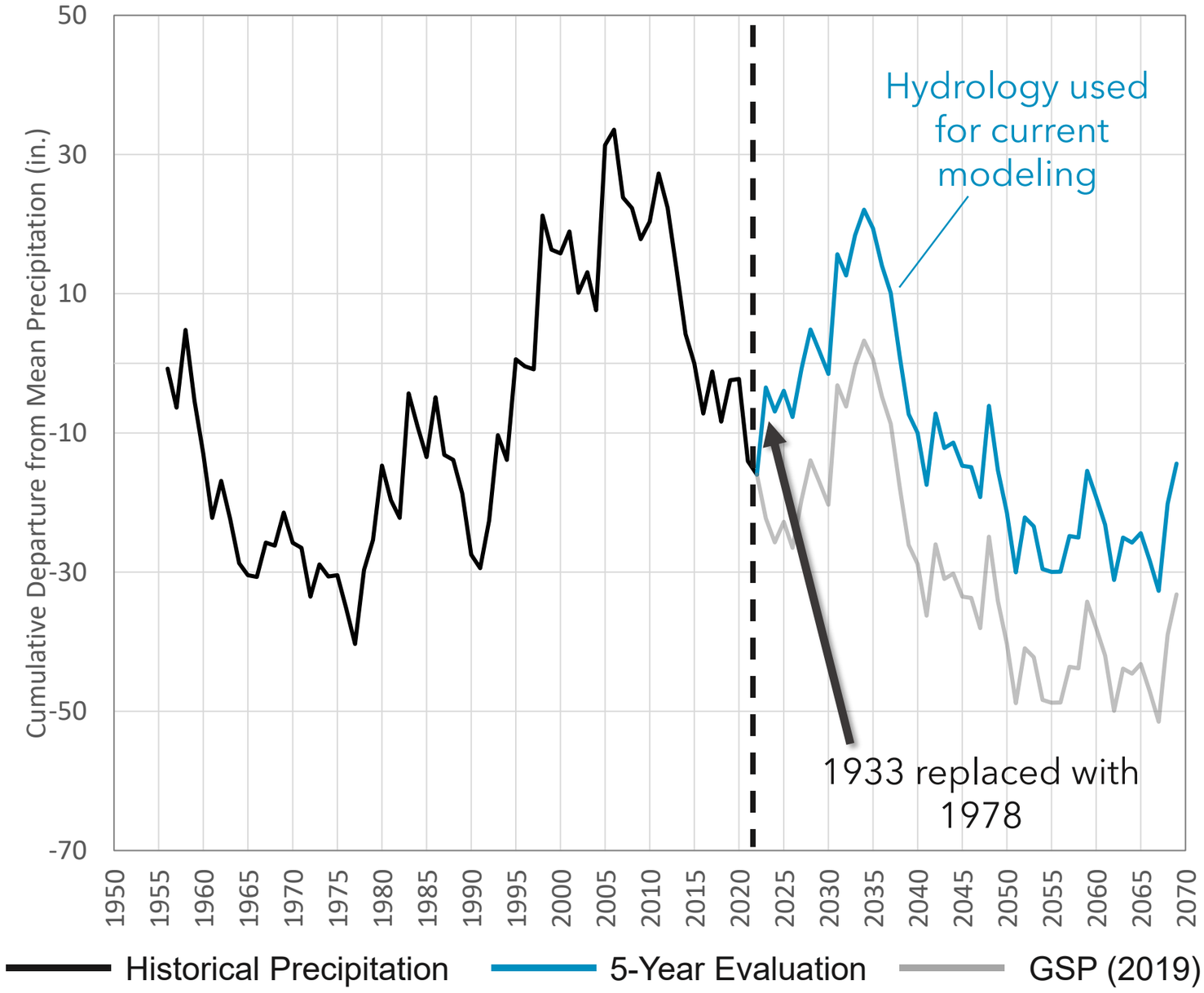
- Integrate Basin Optimization Projects
- Maintain Baseline scenario extractions
- Quantify the benefit of implementing Basin Optimization Projects

Alternative Pumping Scenario

- Simulate Rampdown to achieve Sustainable Groundwater Management by 2040
- Include the entire suite of Basin Optimization Projects

Simulation Time Period and Hydrology

- Time Period:
  - October 1, 2022 through September 30, 2069
- Hydrology:
  - 1933 – 1979 Hydrology, adjusted by DWR's 2070 climate change factors
  - 1933 replaced with 1978 to reflect the wet 2023 water year conditions
- Consistent with the assumptions used for the LPV GSP Periodic Evaluation



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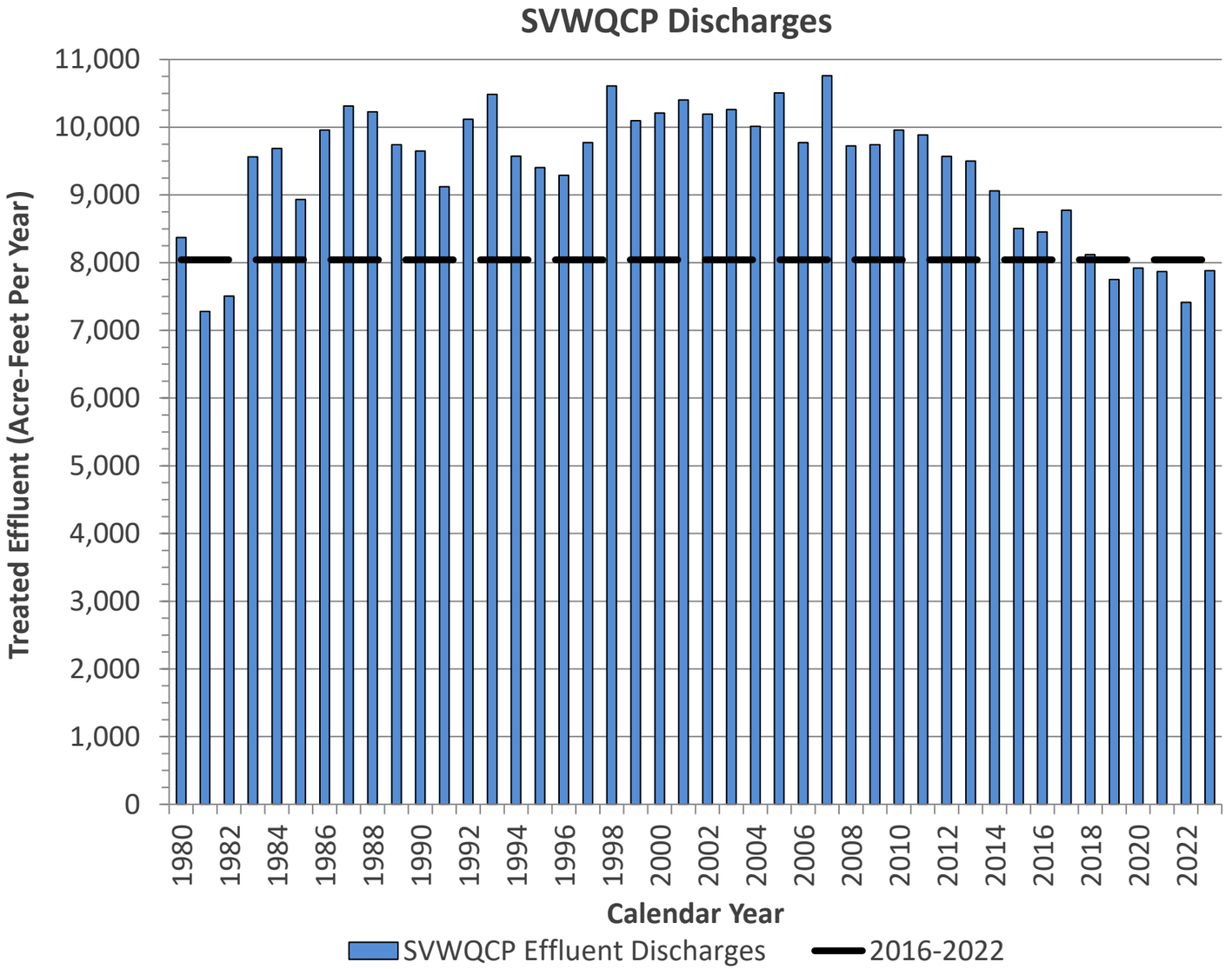
Groundwater Extractions

- Baseline Extractions equal to the Water Year 2024 Operating Yield
  - 40,000 AFY for the entirety of the LPV Basin
- Well by well extractions based on allocations and water use reporting
- When multiple wells are assigned to a single WMID, the pumping rate at each well will be set using the 2016-2022 reported pumping distributions for the respective WMID

Simi Valley Discharges

- Simi Valley Water Quality Control Plant
  - 2016 – 2022 average of 8,040 AFY
- Dewatering Well Discharges
  - 2016-2022 average of 1,318 AFY



WLPMA = West Las Posas Management Area

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Project Suite

LPV Basin Projects:

- Selected based on the DRAFT Basin Optimization Plan submitted to LPV PAC and TAC

OPV Projects:

- Entire project suite used in the No New Projects 3 Scenario for the 2025 LPV GSP Periodic Evaluation
- These projects will influence groundwater elevations in the WLPMA

Basin Optimization Projects

Project Name	BOP Project No.	Anticipated Water Supply (AFY)	Projected Offset Pumping Reduction (AFY)
Arroyo Simi Las Posas Water Acquisition	5	0*	0
Purchase of Imported water from CMWD for Basin Replenishment	2	1,762	1,762
Arroyo Simi-Las Posas Arundo Removal	1	2,680	0

*Water supply accounted for in Baseline assumptions

Arroyo Simi Las Posas Water Acquisition

Project Description:

- Purchase of recycled water from the City of Simi Valley to maintain Simi Valley Water Quality Control Plant discharges to Arroyo Simi-Las Posas

Simulation Approach

- Maintain Simi Valley Water Quality Control Plant and Dewatering Well discharges throughout the entire simulation period
- Baseline scenario assumes that discharges to Arroyo Simi-Las Posas will be constant throughout the 47-year simulation period
  - Assumption is based on Simi Valley's 2020 UWMP recycled water demand projects
- **Simulated flows in Arroyo Simi-Las Posas will be equal to the Baseline scenario**

Purchase of Imported Water from CMWD for Basin Replenishment

Project Description:

- Purchase of 1,762 AFY imported water from CMWD for use in lieu of groundwater in the WLPMA
- Limited to water purveyors with the ability to receive water from CMWD

Simulation Approach

- Reduce VCWWD-19 and ZMWC pumping in the WLPMA by 1,762
- Pumping reduction applied proportional to VCWWD-19 and ZMWC WLPMA extractions
  - Well by well reductions based on 2016 to 2022 average annual groundwater extraction distributions

Arroyo Simi Las Posas Arundo Removal Project

Project Description:

- Arundo donax removal from approximately 324 acres of land across the Arroyo-Simi Corridor
- Water savings of approximately 2,680 AFY

Simulation Approach

- Remove ET from the ELP Model domain along Arroyo Simi Las Posas corridor
- Increase flows in Arroyo Simi-Las Posas by 780 AFY
  - Difference between Water Savings estimate and reduction in ET losses from within the ELP Model domain.

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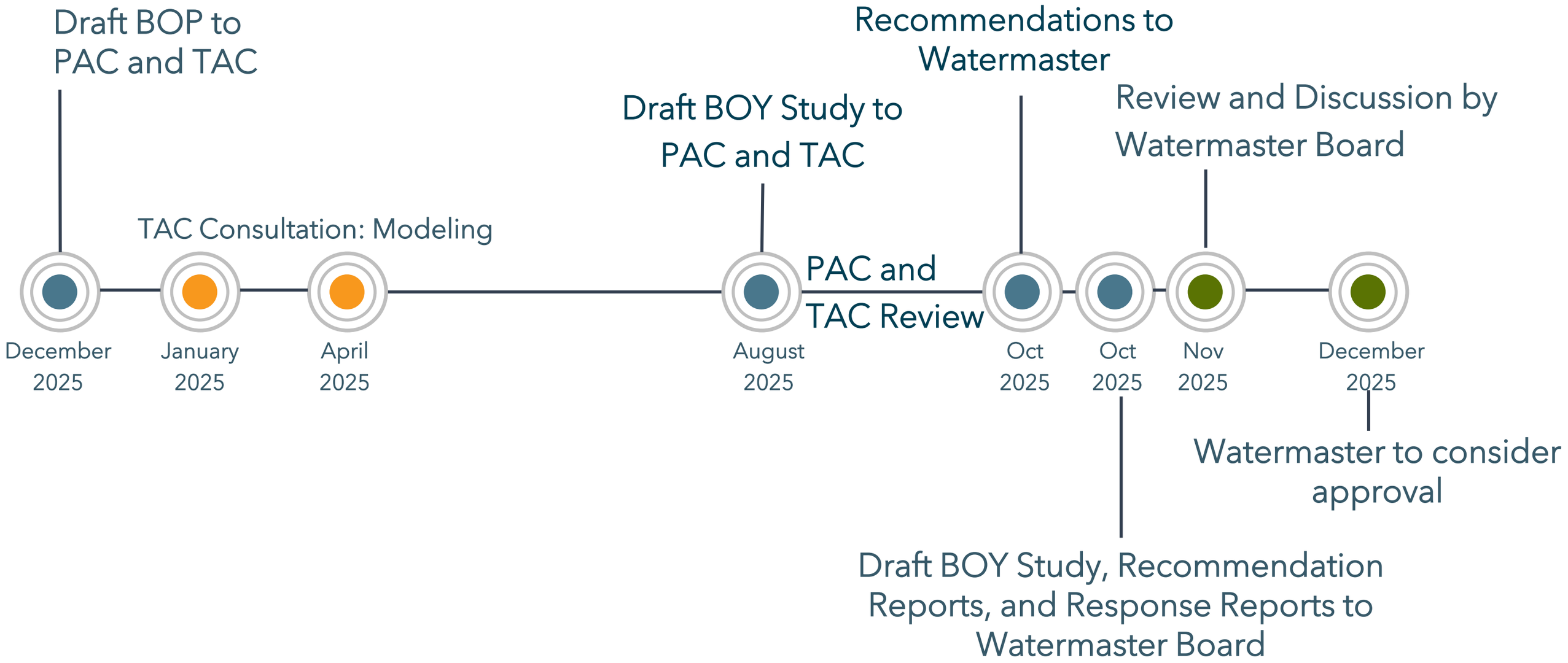
Tentative Timeline



*Schedule assumes United Water Conservation District provides FCGMA with modeling files and/or services to complete modeling for the WLPMA

Open Discussion

Attachment 4

Committee Consultation Request – Draft Las Posas Valley Basin Groundwater Sustainability Plan 2025 Annual Report Covering Water Year 2024

FOX CANYON GROUNDWATER MANAGEMENT AGENCY
LAS POSAS VALLEY WATERMASTER

MEMORANDUM

Date: **January 15, 2025**

To: **Las Posas Valley Watermaster Technical Advisory Committee**

From: **Kudzai F. Kaseke, Assistant Groundwater Manager**

Subject: **Draft Las Posas Valley Basin Groundwater Sustainability Plan 2025 Annual Report Covering Water Year 2024.**

Dear Las Posas Valley Watermaster Technical Advisory Committee (TAC):

Attached for your review and committee consultation in compliance of the judgment entered in Las Posas Valley Water Rights Coalition v. Fox Canyon Groundwater Management Agency VENCI00509700 (Judgement) is the Las Posas Valley Watermaster's (Watermaster) Draft 2025 Las Posas Valley Basin GSP Annual Report. The Judgment states that, "In its role as the Groundwater Sustainability Agency (GSA), FCGMA shall file an Annual Report and each GSP Update to DWR, and in its role as Watermaster, the FCGMA shall file each Annual Report and each GSP Update with the Court as part of the technical data to be considered and as a material component of the Basin Optimization Yield and all future Reassessments of the Basin Optimization Yield as set forth in Section 4.10. The FCGMA shall undertake Committee Consultation in developing the Annual Reports and GSP Updates." (Judgment § 4.9.1.)

Watermaster acknowledges the current draft is incomplete and plans to bring a revised draft to your committee for consultation at a later stage. Watermaster staff plans to bring the Draft 2025 Las Posas Valley Basin GSP Annual Report to the Fox Canyon Groundwater Management Agency Board of Directors (acting as the Watermaster Board) for approval at its March 26, 2025, meeting and submission to DWR by April 1, 2025. Please provide feedback via the email below to the Watermaster.

Please contact me at 805 654 2010 or LPV.Watermaster@ventura.org with any questions or concerns.

Las Posas Valley Basin Groundwater Sustainability Plan

2025 Annual Report Covering Water Year 2024

MARCH 2025

Prepared for:

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Printed on 30% post-consumer recycled material.

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SECTION **PAGE NO.**

TABLES

FIGURES

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Executive Summary

The Fox Canyon Groundwater Management Agency (FCGMA), the Groundwater Sustainability Agency (GSA) for the portions of the Las Posas Valley (LPV) Basin within its jurisdictional boundaries, in coordination with the other two GSAs in the LPV Basin, has prepared this sixth annual report for the LPV Basin Groundwater Sustainability Plan (GSP) in compliance with the 2014 Sustainable Groundwater Management Act (SGMA) (California Water Code, Section 10720 et seq.). This annual report covers the entire LPV Basin. The GSP for the LPV was submitted to the Department of Water Resources (DWR) on January 13, 2020 and was approved by DWR on January 13, 2022. SGMA regulations require that an annual report be submitted to DWR by April 1 of each year following the adoption of the GSP. This annual report provides an update on the groundwater conditions in the LPV Basin for water year 2024 (October 1, 2023 through September 30, 2024).[1]

The LPV received 23.25 inches of precipitation in the 2024 water year. This is 50% higher than long-term average precipitation, measured between 1956 and 2024, for the LPV of 15.4 inches per year. The average precipitation in the LPV between 2016 and 2024 was 16.4 inches per year.

Groundwater elevations in the Fox Canyon aquifer increased throughout the majority of the LPV Basin between spring 2023 and 2024. In the West Las Posas Management Area (WLPMA), increases in groundwater elevations ranged from approximately 3 to 62 feet. Spring 2024 groundwater elevations, which were available for three of the five key wells in the WLPMA, were 4 to 40 feet higher than the minimum threshold groundwater elevations. In the ELPMA, groundwater elevations were approximately 5 to 44 feet higher in spring 2024 than spring 2023. Spring groundwater elevations in the key wells in the ELPMA were 25 to 175 feet above the minimum threshold groundwater elevations. Two notable areas of the LPV Basin, the eastern WLPMA and northern ELPMA, had groundwater elevations that did not increase between 2023 and 2024. In these areas, groundwater elevations were lower than in 2015.

In the WLPMA, the volume of groundwater in storage increased by approximately 4,400 AF in water year 2024, with the largest increases occurring in the western portion of management area, near the Oxnard Subbasin. In this part of the WLPMA groundwater elevations and storage are influenced by Santa Clara River water recharge through United Water Conservation District's (UWCD) spreading facilities. In water year 2024, UWCD recharged approximately 80,530 AF of Santa Clara River water into the Oxnard Subbasin. In the ELPMA, the volume of groundwater in storage increased by approximately 5,300 AF in water year 2024. During the 2024 water year, Calleguas Municipal Water District (CMWD) operated its Aquifer Storage and Recovery (ASR) well field to both extract and inject imported water temporarily stored in the ELPMA. Over this period, CMWD injected a net volume of approximately 520 AF of imported water for temporary storage in the ELPMA. Since 2015, groundwater in storage has declined by approximately 15,200 AF in the LPV Basin.

On July 10, 2023, the Santa Barbara Superior Court issued a decision adopting a judgment in *Las Posas Valley Water Rights Coalition, et al., v. Fox Canyon Groundwater Management Agency*, Santa Barbara Sup. Ct. No. VENC100509700 (Judgment). The Judgment adjudicates all groundwater rights in the LPV and provides for the LPV's sustainable management pursuant to SGMA. The Judgment appoints FCGMA as the Watermaster for the LPV responsible for overseeing implementation of the Judgment. As part of implementing the Judgment, FCGMA has:

[1] The Judgment defines the time period from October 1, 2023 through September 30, 2024 as water year 2023.

- Appointed the LPV Policy Advisory Committee and Technical Advisory Committee.
- Established an initial Basin Assessment to fund management of the LPV Basin.
- Implemented the initial allocation system established through the Judgment.
- Consulted with the LPV Technical Advisory Committee to develop the LPV Basin Optimization Yield Study.
- Developed an initial draft LPV Basin Optimization Plan.

In addition to the activities completed in their role as Watermaster for the LPV, on December 13, 2024, the FCGMA Board of Directors adopted its first Periodic Evaluation of the GSP, which provides an assessment of progress towards sustainability in the LPV Basin. The information presented in the Periodic Evaluation demonstrates that the LPV Basin has not experienced undesirable results since 2015, except in the eastern part of the WLPMA, where groundwater elevations at one key well (02N20W06R01S) were consistently measured below the minimum threshold. Additionally, while groundwater elevations were above the minimum thresholds at all other key wells, groundwater elevations in northern ELPMA declined throughout the evaluation period. These ongoing groundwater elevation declines in eastern WLPMA and northern ELPMA indicate that groundwater production from the LPV Basin exceeds the sustainable yield.

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1 Background and Plan Area

1.1 Background

FCGMA, the Groundwater Sustainability Agency (GSA) for the majority of the Las Posas Valley (LPV) Basin (DWR Bulletin 118 Basin No. 4-008) which lies within its jurisdictional boundaries, has prepared, in coordination with the other two GSAs, this annual report for the LPV Basin GSP in compliance with SGMA (California Water Code, Section 10720 et seq.). SGMA requires that an annual report be submitted to DWR by April 1 of each year following the adoption of the GSP. FCGMA adopted a GSP for the LPV in December 2019 and submitted the GSP to DWR on January 13, 2020. DWR approved the LPV GSP on January 13, 2022. FCGMA submitted its first Periodic Evaluation of the LPV GSP to DWR on January 13, 2025.

FCGMA is one of three GSAs in the LPV Basin. The other two GSAs are the Camrosa Water District (CWD) Las Posas Basin GSA and the Las Posas Basin Outlying Areas GSA (County of Ventura). This annual report applies to the entirety of the LPV Basin. To coordinate management and reporting in the LPV Basin, FCGMA and CWD have executed a Memorandum of Understanding, and FCGMA and the County have formed a Joint Powers Authority.

1.1.1 Fox Canyon Groundwater Management Agency

FCGMA is an independent special district formed by the California Legislature in 1982 to manage and protect the aquifers within its jurisdiction for the common benefit of the public, and all agricultural and M&I users (FCGMA et al. 2007). FCGMA's boundaries include all land overlying the Fox Canyon aquifer (FCA) and includes portions of the LPV (4-008), the Oxnard Subbasin (4-004.02), the Pleasant Valley Basin (4-006), and the Arroyo Santa Rosa Valley Basin (ASRVB; 4-007).

FCGMA is governed by a Board of Directors (Board) with five members who represent: (1) the County of Ventura (County), (2) the United Water Conservation District (UWCD), (3) seven mutual water companies and water districts within the Agency[2], (4) five incorporated cities which are all or a portion of each is within the FCGMA jurisdictional area[3], and (5) a farmer representative. The Board members representing the County, UWCD, the mutual water companies and water districts, and the incorporated cities are appointed by their respective organizations or groups. The representative for the farmers is appointed by the other four seated Board members from a list of candidates jointly supplied by the Ventura County Farm Bureau and the Ventura County Agricultural Association. An alternate Board member is selected by each appointing agency or group in the same manner as the regular member and acts in place of the regular member in case of absence or inability to act. All members and alternates serve for a 2-year term of office, or until the member or alternate is no longer an eligible official of the member agency. Information regarding current FCGMA Board representatives can be found on the FCGMA website[4].

[2] The seven mutual water companies and water districts are: Alta Mutual Water Company, Pleasant Valley County Water District (PVCWD), Berylwood Heights Mutual Water Company, Calleguas Municipal Water District (CMWD), CWD, Zone Mutual Water Company, and Del Norte Mutual Water Company.

[3] The five incorporated cities within the FCGMA jurisdictional area are: Ventura, Oxnard, Camarillo, Port Hueneme, and Moorpark

[4] FCGMA Website: https://fcgma.org/

1.1.2 LPV Groundwater Sustainability Plan

The GSP for the LPV Basin defined the conditions under which the groundwater resources of the entire LPV Basin will be managed sustainably in the future (FCGMA 2019). Although DWR has defined the LPV Basin as a single groundwater basin, there is limited hydraulic connection between the eastern and western parts of the LPV Basin (FCGMA 2019). Hydrogeologic differences in the controls on groundwater recharge and groundwater production necessitated the definition of three management areas in the LPV. These management areas are the West Las Posas Management Area (WLPMA), the East Las Posas Management Area (ELPMA) and the Epworth Gravels Management Area. The Epworth Gravels Management Area is a shallow unconfined aquifer located within the geographic boundaries of the ELPMA but separated from the underlying FCA and Grimes Canyon aquifer (GCA).

The GSP evaluated groundwater conditions in four hydrostratigraphic units in the WLPMA: the shallow alluvial system, the Upper San Pedro Formation, the FCA, and the GCA (FCGMA 2019). The WLPMA is hydrogeologically connected to the Oxnard Subbasin to the west. The shallow alluvial system is connected to the Upper Aquifer System (UAS) in the Oxnard Subbasin. The Upper San Pedro Formation, FCA, and GCA compose the Lower Aquifer System (LAS) in the LPV (FCGMA 2019). The LAS of the LPV Basin is hydrogeologically connected to the LAS of the Oxnard Subbasin.

In the ELPMA the GSP evaluated groundwater conditions in the Epworth Gravels, Shallow Alluvial aquifer, the Upper San Pedro Formation, the FCA, and the GCA (FCGMA 2019). The Upper San Pedro Formation is not a primary aquifer but is a source of water to the underlying FCA. Geologic folding and faulting of the region has resulted in variations in thickness, elevation, and exposure of the FCA in the ELPMA. This folding was found to result in differential impacts from groundwater elevation declines in the ELPMA (FCGMA 2019).

The primary sustainability goal for the LPV Basin adopted in the GSP is "to maintain a sufficient volume of groundwater in storage in each management area so that there is no significant and unreasonable decline in groundwater elevation or storage over wet and dry climatic cycles" (FCGMA 2019). Additionally, "groundwater levels in the WLPMA should be maintained at elevations that are high enough to not inhibit the ability of the Oxnard Subbasin to prevent net landward migration of the saline water impact front after 2040" (FCGMA 2019). These goals were established based on both historical and potential future undesirable results to the groundwater resources of the LPV Basin from six sustainability indicators: chronic lowering of groundwater levels, reduction of groundwater storage, seawater intrusion, degraded water quality, land subsidence, and depletions of interconnected surface water. The LPV Basin was found not to experience direct impacts from seawater intrusion or depletion of interconnected surface water.

The GSP established minimum threshold groundwater elevations, which varied geographically within the WLPMA and ELPMA (FCGMA 2019). These groundwater elevations were selected to avoid undesirable results in the LPV Basin. In addition to minimum threshold groundwater elevations, the GSP also established measurable objective groundwater elevations. Measurable objective groundwater elevations are higher than the minimum threshold groundwater elevations to allow for operational flexibility during drought periods (FCGMA 2019). Minimum threshold and measurable objective groundwater elevations were established at one representative monitoring point (or "key well") in the Epworth Gravels Management Area, fifteen representative monitoring points in the ELPMA, and five representative monitoring points in the WLPMA (FCGMA 2019).

The GSP documented conditions throughout the LPV through the fall of 2015. Previous annual reports evaluated progress toward sustainability based on a review of groundwater elevation data, groundwater extraction data, surface water supply used or surface water supply available for use, total water used, and change in groundwater

storage between the fall of 2015 and the end of water year 2023[5]. This annual report documents the conditions in the LPV and the progress toward sustainability for water year 2024.

1.1.3 Las Posas Valley Water Rights Coalition, et al. v. Fox Canyon Groundwater Management Agency

On July 10, 2023, the Santa Barbara Superior Court issued a decision adopting a judgment in *Las Posas Valley Water Rights Coalition, et al., v. Fox Canyon Groundwater Management Agency* (VENC100509700; Judgment). The Judgment adjudicates all groundwater rights in the LPV and provides for the LPV's sustainable management pursuant to SGMA. The Judgment established FCGMA as the Watermaster for the LPV responsible for overseeing implementation of the Judgment.

The Judgment requires that FCGMA prepare and submit annual reports for the LPV that include information on groundwater allocations[6], progress towards implementing the Basin Optimization Plan and Projects, accounting of Calleguas Municipal Water District's (CMWD) Aquifer Storage and Recovery (ASR) Project operations, annual fiscal reporting, and a review of Watermaster activities, in addition to the information required to be included under SGMA. In its role as Watermaster and GSA for the LPV, FCGMA is required to submit the annual reports to both DWR and the Court no later than April 1 of each year.

The Judgment was finalized in July, 10 months into the 2023 water year. Consequently, this 2025 annual report is the first in which the additional information required by the Judgment is included.

1.2 Plan Area

The LPV Basin is bounded to the north by South Mountain and Oak Ridge; to the northeast and east by the foothills of Big Mountain; to the south by the Springville Fault (western segment of the Simi–Santa Rosa Fault) and the Las Posas Hills; and to the west by the Oxnard Subbasin of the Santa Clara River Valley Basin (Figure 1-1).

In the Camarillo Hills area, the Springville Fault Zone is believed to form a groundwater flow barrier at depth between the aquifers in the LPV Basin and the PVB, based on historical hydraulic head differences of up to 60 feet across the fault zone (Turner 1975). However, shallow alluvial deposits in the vicinity of Arroyo Las Posas and the Somis Gap are in hydraulic communication with the PVB (CMWD 2017). On the west, the WLPMA is in hydrogeologic communication with the Oxnard Subbasin. The boundary between the LPV Basin and Oxnard Subbasin is a jurisdictional boundary.

1.2.1 Climate

The climate of the LPV is typical of coastal Southern California, with average daily temperatures generally ranging from 54°F to 84°F in summer and from 40°F to 74°F in the winter (FCGMA 2019). Typically, most of the precipitation in the Ventura County region falls between November and April. Precipitation is measured at several

[5] A water year, in this report, begins on October 1 and ends on September 30 of the following year. The convention for naming the water year is to name the water year based on the year in which it ends. For example, the 2022 water year begins on October 1, 2021 and ends on September 30, 2022. This differs from the definition provided in the Judgment, which defines the water year based on the starting calendar year. For example, the Judgment defines the 2022 water year as the period from October 1, 2022 through September 30, 2023.

[6] This includes annual allocation accounting, annual allocation calculations, an updated groundwater allocation schedule, a compilation of new or replacement well applications, and summary of new water use applications.

stations in the LPV (Figure 1-2). Water year precipitation, measured at Station 190, in the central LPV is highly variable, ranging from 3.5 inches in 2021 to 39.0 inches in 2005 (Figure 1-3; Las Posas Valley Basin Historical Water Year Precipitation). On average, the LPV received approximately 15.4 inches of precipitation per water year between 1956 and 2024[7]. In water year 2024, the LPV received 23.25 inches of precipitation, which is approximately 150% of the long-term average.

Since 2015, the year that SGMA was enacted, the LPV has experienced two wet[8] water years (2023 and 2024), three above normal water years (2017, 2019, and 2020), one below normal water year (2022), two dry water years (2016 and 2018), and one critically dry water year (2021). Water year 2021 was the driest water year on record in the LPV. The average annual precipitation in the LPV between 2016 and 2024 was 16.4 inches per year, which is approximately 6% higher than the 1956 to 2024 average.

1.2.2 Surface Water and Drainage Features

The dominant surface water body in the LPV is Arroyo Las Posas, located in the ELPMA (Figure 1-1). In the easternmost portion of the LPV, Arroyo Las Posas is named Arroyo Simi. The Arroyo Las Posas becomes Calleguas Creek in the PVB. Arroyo Las Posas, which drains a watershed larger than the area of the LPV, is a source of recharge to the ELPMA. Dry weather flows in Arroyo Las Posas result from upstream wastewater treatment plant and dewatering well discharges to the Arroyo Simi (FCGMA 2019).

There is one active streamflow gauging station in the LPV Basin. This station, gauge 841A, which is maintained by the Ventura County Watershed Protection District (VCWPD), is located on Arroyo Simi-Las Posas above Hitch Blvd. (Figures 1-2 and 1-4). Streamflow measured at gauge 841 since water year 2010 is presented in Table 1-1.

Table 1-1. Streamflow in Arroyo Las Posas for Water Years 2010 through 2024

Water Year	Average Daily Flow (cfs) at Gauge 841A
2010	38.5
2011	51.1
2012	25.3
2013	17.5
2014	NM
2015	17.7
2016	15.0
2017	31.0
2018	14.7
2019	22.5
2020	22.6
2021	9.5
2022	24.8

7 Long-term mean precipitation was calculated using precipitation measured at Station 190 over the period from water year 1956 through 2024.

8 Water years have been classified into five types based on their relationship to the mean water year precipitation. The five types are: critical, dry, below normal, above normal, and wet. Critical water years are < 50% of the mean annual precipitation. Dry water years are ≥ 50% and <75% of the mean annual precipitation. Below normal water years are ≥ 75% and <100% of the mean annual precipitation. Above normal water years are ≥ 100% and <150% of the mean annual precipitation. Wet water years are ≥ 150% of the mean annual precipitation.

Table 1-1. Streamflow in Arroyo Las Posas for Water Years 2010 through 2024

Water Year	Average Daily Flow (cfs) at Gauge 841A
2023	50.9
2024	34.1

Notes: cfs – cubic feet per second; NM – not measured

Average daily flows in Arroyo Las Posas reflect the water year precipitation (Section 1.2.1) with the highest daily average flows (over 30 cfs) measured at gauge 841A during the 2010 to 2024 period occurring in 2010, 2011, 2017, 2023, and 2024. Water years 2010, 2011, and 2017 were above normal water years in which water year precipitation was approximately 140% of the long-term mean. Water years 2023 and 2024 were wet water years in which water year precipitation was approximately 185% of the long-term average (Table 1-1; Figure 1-4).

1.3 Annual Report Organization

This is the sixth Annual Report prepared since the GSP for the LPV was submitted to DWR. This annual report is organized according to the GSP Emergency Regulations. Chapter 1 provides the background information on the GSP, the LPV, and the FCGMA. Chapter 2 provides information on the groundwater conditions in the LPV since 2015, including groundwater elevations, groundwater extractions, surface water supply, total water available, and change in groundwater storage. Chapter 3 provides an update on the GSP implementation. In addition, this is the first Annual Report that includes additional information on basin management activities, groundwater usage, fiscal reporting, and CMWD's ASR program as required by the Judgment.

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2 Groundwater Conditions

This chapter presents the groundwater conditions in the LPV during water year 2024. A comparison of water year 2024 conditions to water year 2023 is provided to characterize the impact that water year type, groundwater production, surface water, imported water and recycled water availability in water year 2024 has had on groundwater conditions in the LPV. Additionally, data from water year 2015 is provided for context.

2.1 Groundwater Elevations

Groundwater elevations for the fall of 2023 and spring of 2024 in each principal aquifer are presented in Figures 2-1 through 2-10: the Shallow Alluvial aquifer in Figures 2-1 and 2-2, the Epworth Gravels aquifer in Figures 2-3 and 2-4, the Upper San Pedro Formation in Figures 2-5 and 2-6, the FCA in Figures 2-7 and 2-8, and the GCA in Figures 2-9 and 2-10. These maps show the seasonal low (fall 2023) and high (spring 2024) groundwater elevations for the 2024 water year. Groundwater elevations are best constrained in the FCA (Figures 2-7 and 2-8), and least constrained in the GCA (Figures 2-9 and 2-10). Historical groundwater elevation hydrographs for each of the representative monitoring points, or "key wells", established in the LPV Basin GSP, are presented in Figures 2-11 through 2-14 (FCGMA 2019). Additionally, the water year 2024 groundwater elevations are reported for each key well in Table 2-1.

Fall and spring groundwater elevations for the 2024 water year were defined as any groundwater elevation measured between October 1 and October 31, 2023, and March 1 and March 31, 2024, respectively. These four-week measurement windows are the same measurement windows used to generate fall and spring groundwater elevation contours for the past two Annual Reports and first Periodic Evaluation of the LPV GSP. The GSP recommended collecting groundwater elevations within a two-week window in the future (FCGMA 2019). FCGMA is working to formalize agreements with partner agencies that monitor specific wells to help ensure that timely monitoring is conducted within the two-week window.

Groundwater elevations in the LPV Basin are measured in both groundwater monitoring and production wells. The groundwater elevation contour maps presented herein are based on the groundwater elevations measured at wells screened solely within an individual aquifer. The intent of using groundwater elevations from wells screened within a single aquifer is to accurately represent groundwater flow directions within a single aquifer, as well as vertical gradients between aquifers.

2.1.1 Groundwater Elevation Contour Maps

2.1.1.1 Shallow Alluvial Aquifer

Fall 2023 groundwater elevations in the Shallow Alluvial aquifer in the ELPMA ranged from a low of 272 feet mean sea level (ft. msl) at well 02N20W09Q08S (Table 2-1) to a high of 435 ft. msl at well 02N19W07G01S (Figure 2-1). The groundwater elevation low of 272 ft. msl occurred along the western reach of Arroyo Las Posas within the LPV Basin, near the boundary with the PVB (Figure 2-1). In this part of the Shallow Alluvial aquifer, fall 2023 groundwater elevations were 11 to 12 feet higher than fall 2022 and 1 to 4 feet higher than fall 2015. Farther east, at wells 02N19W07G01S and 02N19W07K04S, the fall 2023 groundwater elevations were equal to fall 2022 and approximately 1 foot lower than fall 2015.

Spring 2024 groundwater elevations ranged from a low of approximately 192 ft. msl at well 02N20W17J06S to a high of 436 ft. msl at well 02N19W07G01S (Figure 2-2). Like the fall measurements, groundwater elevations in the Shallow Alluvial aquifer declined from east to west. Spring 2024 groundwater elevations were higher than they were in spring 2023 at all wells with complete measurements, except well 02N19W07G01S, where the spring 2024 groundwater elevation was 1 foot lower than spring 2023. Since 2015, spring groundwater elevations in the western portion of the Shallow Alluvial aquifer have increased between 2 and 6 feet. Over this same period, spring groundwater elevations at well 02N19W07G01S, which is in the central portion of the Shallow Alluvial aquifer, declined by approximately 0.3 feet.

2.1.1.2 Epworth Gravels Aquifer

The fall 2023 groundwater elevations were measured at three wells in the Epworth Gravels aquifer: 03N19W29F06S, 03N19W30E07S, and 03N19W30M02S. At these three wells, groundwater elevations ranged from a low of approximately 608 ft. msl to a high of approximately 641 ft. msl (Figure 2-3). The fall 2023 groundwater elevations measured at these wells were approximately 3 to 20 feet higher than fall 2022 and 3 to 9 feet higher than fall 2015.

In spring 2024, the groundwater elevation at well 03N19W29F06S was approximately 619 ft. msl (Table 2-1), and approximately 644 ft. msl at well 03N19W30E07S (Figure 2-4). These spring groundwater elevations were approximately 6 to 10 feet higher than spring 2023 and approximately 18 feet higher than spring 2015.

2.1.1.3 Upper San Pedro Formation

WLPMA

In fall 2023, groundwater elevations in the Upper San Pedro Formation in the WLPMA ranged from a low of approximately -63 ft. msl (measured at well 02N21W15M03S) to a high of approximately 246 ft. msl (measured at well 02N21W16J01S; Figure 2-5). Between fall 2022 and 2023, groundwater elevations in the Upper San Pedro increased by approximately 1 to 13 feet in western WLPMA. In the central WLPMA, groundwater elevations increased by approximately 7 to 11 feet (measured at wells 02N21W11J06S and 02N21W11J05S, respectively). The fall 2023 groundwater elevations were approximately 4 to 37 feet lower than fall 2015 at all wells except 02N21W16J01S, where the fall 2023 groundwater elevation was approximately 3 feet higher than 2015.

In spring 2023, groundwater elevations in the Upper San Pedro Formation in the WLPMA ranged from a low of -49 ft. msl at well 02N21W15M03S to high of 250 ft. msl at well 02N21W16J01S (Figure 2-6). Between spring 2023 and 2024, groundwater elevations in the Upper San Pedro increased by approximately 1 to 20 feet in western WLPMA and 3 to 15 feet in central WLPMA. Spring 2023 groundwater elevations were approximately 1 to 32 feet lower than spring 2015 conditions at all wells with complete measurements except 02N21W16J01S, where the spring 2024 groundwater elevation was approximately 5 feet higher than spring 2015.

ELPMA

In the ELPMA fall 2023 groundwater elevations within the Upper San Pedro Formation were measured at four wells (Figure 2-5). The groundwater elevation at well 02N19W07K03S, adjacent to Arroyo Simi-Las Posas, was 437 ft. msl and the groundwater elevation at well 03N20W35R04S, in the central portion of the management area, was approximately 260 ft. msl (Figure 2-5). The fall 2023 groundwater elevation measured at well 02N19W07K03S was approximately 1 foot higher than fall 2022. The fall 2023 groundwater elevation measured at well

03N20W35R04S was approximately 1 foot lower than fall 2022. In the central part of the management area, the fall 2023 groundwater elevation was approximately 13 feet lower than fall 2015.

In spring 2023 groundwater elevations ranged from 439 ft. msl at well 02N19W07K03S to approximately 263 ft. msl at well 03N20W35R04S (Figure 2-6). Spring 2024 groundwater elevations along Arroyo Las Posas were equal to spring 2023 conditions. Well 02N19W07K03S was not measured in spring 2015. Within the trough of the Moorpark syncline (FCGMA 2019; Figure 2-2), the spring 2023 groundwater elevation was approximately 1 foot higher than spring 2022 and 9 feet lower than spring 2015.

2.1.1.4 Fox Canyon Aquifer

WLPMA

Fall 2023 groundwater elevations in the FCA in the WLPMA ranged from a low of approximately -236 ft. msl at well 02N20W06R01S (Figure 2-7), which is located in the eastern portion of the WLPMA, to a high of -33 ft. msl at well 02N20W12H01S, which is located in the central portion of the WLPMA (Figure 2-7). Between fall 2022 and 2023, groundwater elevations increased by approximately 3 to 35 feet, except in the far north-eastern part of the WLPMA, where the fall 2023 groundwater elevation was approximately 2 feet lower than fall 2022 at well 03N20W32H03S. In the central portion of the WLPMA, the fall 2023 groundwater elevation at well 02N21W11J03S was 2 feet lower than it was in fall 2015. Farther east, the fall 2023 groundwater elevation at well 02N20W06R01S was 82 feet lower than in fall 2015.

Spring 2024 groundwater elevations in the WLPMA ranged from a low of approximately -167 ft. msl at well 02N21W13A01S to a high of approximately -25 ft. msl at well 02N20W12H01S (Figure 2-8). Spring groundwater elevation changes between 2023 and 2024 varied geographically across the WLPMA. In the western part of the WLPMA, near the boundary with the Oxnard Subbasin, the spring 2024 groundwater elevation at well 02N21W17F05S was approximately 62 feet higher than spring 2023. In the eastern part of the WLPMA, the spring 2024 groundwater elevations measured at wells 02N21W11J03S and 02N21W12H01S were approximately 3 feet higher than spring 2023.

At the only well with complete measurements in western WLPMA (02N21W17F05S), spring 2024 groundwater elevations were approximately 35 feet higher than 2015. In contrast, at the only well with complete measurements in central WLPMA (02N21W11J03S), spring 2024 groundwater elevations were approximately 12 feet lower than 2015. None of the wells screened exclusively within the FCA in eastern WLPMA were measured in both spring 2015 and spring 2024. Consequently, a direct comparison between the spring 2015 and spring 2024 groundwater elevations is not possible for the FCA in the eastern WLPMA.

ELPMA

In the ELPMA, fall 2023 groundwater elevations ranged from a high of approximately 297 ft. msl at well 02N20W11B02S, which is located near Arroyo Simi-Las Posas, to a low of approximately 113 ft. msl at well 02N20W03J01S, which is in the central portion of the ELPMA (Figure 2-7). In general, fall groundwater elevations increased in the southern, central, and western parts of the ELPMA between fall 2022 and fall 2023. The one exception to this was at well 02N19W08H02S, which is located near Arroyo Las Posas, where the fall 2023 groundwater elevation was approximately 0.2 feet lower than fall 2022. Observed increases in the southern, central, and western ELPMA ranged from approximately 9 to 28 feet (measured at wells 02N20W11B02S and

03N20W35R02S, respectively). In the central and southern ELPMA, fall 2023 groundwater elevations were approximately 1 to 10 feet higher than 2015.

In the northeastern part of the ELPMA, fall 2023 groundwater elevations were 3 to 15 feet lower than fall 2022 (measured at wells 03N19W28N03S and 03N19W31B01S, respectively). The one exception to this is well 03N19W31D07S, where the fall 2023 groundwater elevation was approximately 44 feet higher than fall 2022. In northeastern ELPMA, fall 2023 groundwater elevations were between 1 to 25 feet lower than 2015.

Spring 2024 groundwater elevations in the ELPMA ranged from a high of approximately 303 ft. msl at well 02N20W11B02S, which is located near Arroyo Simi-Las Posas, to a low of approximately 115 ft. msl at well 03N20W27H03S, which is in the northern ELPMA (Figure 2-8). Groundwater elevations generally increased between spring 2023 and 2024 in the southern, central, and western ELPMA. In the southern ELPMA, near Arroyo Las Posas, the spring 2024 groundwater elevation measured at well 02N20W10J01S was approximately 5 feet higher than spring 2023. Downgradient of this well, groundwater elevations were approximately 5 to 44 feet higher than spring 2023 (measured at wells 02N20W03H01S and 02N20W10D02S, respectively; Table 2-1). In northern ELPMA at groundwater wells with complete measurements, spring 2024 groundwater elevations were approximately 6 to 16 feet higher than spring 2023 (measured at wells 03N19W19J01S and 03N20W26R03S, respectively; Table 2-1).

Groundwater elevation changes between spring 2015 and spring 2024 varied geographically across the ELPMA. The largest groundwater elevation declines over this period were in northern ELPMA, where the spring 2024 groundwater elevations were 10 to 24 feet lower than spring 2015 (measured at wells 03N19W30D01S and 03N19W28N03S, respectively). In the southern portion of the ELPMA, adjacent to and downgradient of Arroyo Simi-Las Posas, spring 2024 groundwater elevations were approximately 3 to 33 feet higher than 2015 (measured at wells 02N20W10J01S and 02N20W10D02S, respectively; Table 2-1).

2.1.1.5 Grimes Canyon Aquifer

WLPMA

Of the eight wells screened solely within the GCA in the WLPMA, groundwater elevations were only measured at wells 02N21W28A02S and 02N21W22G01S in spring 2024 and none were measured in fall 2023 (Figures 2-9 and 2-10). The spring 2024 groundwater elevations were approximately -86 ft. msl and -93 ft. msl at wells 02N21W28A02S and 02N21W22G01S, respectively (Figure 2-10). The spring 2024 groundwater elevation at well 02N21W18A02S was approximately 11 feet higher than spring 2023. Well 02N21W22G01S was not measured in spring 2023.

The spring 2024 groundwater elevations measured at wells 02N21W28A02S and 02N21W22G01S were approximately 7 and 9 feet lower than spring 2015, respectively.

ELPMA

Groundwater elevations in the GCA in the ELPMA were only measured at well 03N19W30E07S in water year 2024. The fall 2023 groundwater elevation at this well was approximately 146 ft. msl (Figure 2-9). The groundwater elevation at this well was not measured in fall 2022 or fall 2015. Spring 2024 groundwater elevations were not measured in either of the two wells screened solely in the GCA in the ELPMA (Figure 2-10).

Table 2-1. Water Year 2024 Groundwater Elevations, Minimum Thresholds, Measurable Objectives, and Interim Milestones for Representative Monitoring Wells in the LPV

Well Number	Management Area	Aquifer	Fall Groundwater Conditions			Spring Groundwater Conditions			Minimum Threshold (ft. msl)	Measurable Objective (ft. msl)	2025 Interim Milestone (ft. msl)
			2023 Groundwater Elevation (ft. msl)	Change from 2022 to 2023 (feet)[a]	Change from 2015 to 2023 (feet)[b]	2024 Groundwater Elevation (ft. msl)	Change from 2023 to 2024 (feet)[a]	Change from 2015 to 2024 (feet)[b]			
03N19W29F06S	Epworth Gravels	Epworth Gravels	608.0	20.0	9.4	619.0	10.3	17.5	555	585	581
02N20W09Q08S	ELPMA	Shallow Alluvial	272.0	12.0	1.0	275.0	–	2.4	170	270	–
02N20W12MMW1	ELPMA	Shallow Alluvial	369.0	1.0	–	NM	–	–	300	370	–
02N20W01B02S	ELPMA	Fox	134.0	30.0	–	143.0	**-45.5**	–	80	120	–
02N20W03H01S	ELPMA	Fox	132.0	14.0	**-19.7**	150.0	5.0	**-15.4**	100	135	–
02N20W04F02S	ELPMA	Fox	Destroyed	–	–	Destroyed	–	–	100	145	–
02N20W10D02S	ELPMA	Fox	138.7	14.0	**-11.8**	198.4	43.6	32.9	80	130	–
02N20W10G01S	ELPMA	Fox	250.2	11.6	5.4	260.2	7.3	0.6	100	230	–
02N20W10J01S	ELPMA	Fox	281.6	10.9	2.3	288.5	5.1	2.7	110	250	–
03N19W19J01S	ELPMA	Fox	154.8	1.1	**-21.4**	158.2	6.4	**-21.5**	130	160	–
03N19W28N03S	ELPMA	Fox	156.0	**-3.0**	**-25.0**	158.0	2.0	**-24.0**	130	170	–
03N19W31B01S	ELPMA	Fox	128.7	**-15.3**	**-17.8**	NM	–	–	105	145	–
03N20W34G01S	ELPMA	Fox	133.8	12.4	**-8.1**	145.3	8.6	0.2	75	130	–
03N20W35R03S	ELPMA	Fox	135.0	27.2	**-1.6**	147.2	15.8	**-8.4**	105	145	139
03N20W26R03S	ELPMA	Fox	130.8	27.4	–	144.4	15.8	**-2.1**	100	120	–
03N20W35R02S	ELPMA	Fox	136.0	27.7	7.2	148.1	16.2	**-8.5**	105	145	133
02N20W06R01S	WLPMA	LAS[c]	-235.6	**-46.0**	**-81.6**	NM	–	–	-170	-125	-147
02N20W08F01S	WLPMA	LAS	NM	-	–	-163.6	1.3	–	-195	-150	–
02N21W16J03S	WLPMA	LAS	NM	-	–	NM	–	–	-75	-45	-71
02N21W11J03S	WLPMA	LAS	-71.3	14.4	-2.3	-63.0	2.9	**-12.0**	-70	-50	-64
02N21W12H01S	WLPMA	LAS	-33.4	9.8	–	-25.3	3.2	–	-70	-45	–

ft. msl = feet mean sea level
NM = not measured

[a] Data in this column shows the difference between water year groundwater elevations measured at each representative monitoring site. Positive (+) values indicate that seasonal high or low groundwater elevations have increased from water year 2023 conditions. Negative (-) values indicate that seasonal high or low groundwater elevations have decreased from water year 2023 conditions. Groundwater elevation declines from 2023 conditions are presented in bold font. Blank cells in this column indicate that data was not measured in the current, or previous, water year.

[b] Data in this column shows the difference between water year 2024 and water year 2015 groundwater elevations measured at each representative monitoring site. Positive (+) values indicate that seasonal high or low groundwater elevations have increased from water year 2015 conditions. Negative (-) values indicate that seasonal high or low groundwater elevations have decreased from water year 2015 conditions. Groundwater elevation declines from 2015 conditions are presented in bold font. Blank cells in this column indicate that data was not measured in the current, or previous, water year.

[c] In the WLPMA, the LAS consists of the FCA and GCA (FCGMA 2019)

2.1.2 Groundwater Elevation Hydrographs

2.1.2.1 Measurable Objectives

In 2015, the end of the GSP reporting period, groundwater elevations were lower than the measurable objective groundwater levels at three of the five key wells in the WLPMA (FCGMA 2019). In the ELPMA, groundwater elevations were lower than the measurable objective groundwater levels at two of the fifteen key wells (FCGMA 2019). In the Epworth Gravels management area, the groundwater elevation was below the measurable objective at the one key well identified in this management area (FCGMA 2019). Section 3.5 of the GSP defined interim milestones for the key wells with groundwater elevations below the measurable objectives, so that groundwater elevations would reach the measurable objectives by 2040 (FCGMA 2019).

Fall 2023 groundwater elevations were measured in three of the five key wells in the WLPMA. The elevations at two of these wells were below the measurable objectives (Table 2-1; Figure 2-11). Spring 2024 groundwater elevations were above the measurable objective groundwater elevations at two (02N20W08F01S and 02N21W12H01S) of the three of the key wells measured in the WLPMA (Table 2-1; Figure 2-11).

In the ELPMA, fall 2023 groundwater elevations were above the measurable objectives in 7 of the 14 key wells measured (Table 2-1). Spring 2024 groundwater elevations were above the measurable objectives in 10 of the 15 key wells measured (Table 2-1; Figures 2-12 through 2-13).

In the key well in the Epworth Gravels Management Area, the groundwater elevation was above the measurable objective in both fall 2023 and spring 2024 (Table 2-1; Figure 2-14).

2.1.2.2 Minimum Thresholds

In 2015, the end of the GSP reporting period, groundwater elevations in the WLPMA were above the minimum threshold groundwater levels at four of the five key wells in the management area (FCGMA 2019). In the ELPMA, groundwater elevations were higher than the minimum threshold water levels at all of the key wells in the management area (FCGMA 2019). In the Epworth Gravels management area, the groundwater elevation was above the minimum threshold at the key well.

Fall 2023 groundwater elevations were measured in three of the five key wells in the WLPMA. The elevations at two of these wells, wells 02N20W06R01S and 02N21W11J03S, were below the minimum thresholds (Table 2-1). Spring 2024 groundwater elevations were above the minimum threshold groundwater elevations at all of the key wells measured in the WLPMA (Table 2-1; Figure 2-11).

In the ELPMA, fall 2023 and spring 2024 groundwater elevations were higher than the minimum threshold at all measured key wells (Table 2-1; Figures 2-12 through 2-13).

The groundwater elevation in the key well in the Epworth Gravels management area was above the minimum threshold groundwater elevation in the fall of 2023 and the spring of 2024 (Table 2-1; Figure 2-14).

2.1.2.3 Interim Milestones

The GSP established interim milestones at three key wells in the WLPMA to measure progress toward sustainability by 2040. Interim milestones were established for 2025, 2030, and 2035 (FCGMA 2019). Fall 2023 groundwater elevations were below the 2025 interim milestones in two of the key wells in the WLPMA that were measured and had established interim milestones (Table 2-1). In the WLPMA, the spring 2024 groundwater elevation was above the 2025 interim milestones for well 02N21W11J03S, the one key well in the WLPMA that was measured and had established interim milestone (Table 2-1).

Interim milestones were established for wells 03N20W35R03S and 03N20W35R02S in the ELPMA. The fall 2023 groundwater elevation was approximately 3 feet higher than the 2025 interim milestone for well 03N20W35R02S and 4 feet lower than the 2025 interim milestone at well 03N20W35R03S (Table 2-1). The spring 2024 groundwater elevations were above the 2025 interim milestones at both wells (Table 2-1).

Both the fall and spring groundwater elevations at the key well in the Epworth Gravels Management Area were above the 2025 interim milestone for this well (Table 2-1).

2.2 Groundwater Extraction

[Water year 2024 groundwater extraction data were not available at the time of reporting. Accordingly, Tables 2-2 and 2-3 summarize extraction information through the end of water year 2023. These tables, and the narrative to this section, will be updated upon receipt of 2024 extraction data.

Additionally, because water year 2024 data are not available, Figure 2-14, which displays the spatial distribution of groundwater extractions in the LPV Basin, has not been prepared. This figure will be prepared upon receipt of 2024 extraction data.]

2.2.1 New or Replacement Well Applications

FCGMA did not receive any new or replacement well applications in water year 2024.

2.2.2 New Use Applications

FCGMA did not receive any new use applications in water year 2024.

2.3 Surface Water Supply

There are no locally derived sources of surface water in the LPV (FCGMA 2019).

Table 2-2. Reported Annual Groundwater Extractions in the WLPMA by Aquifer System and Water Use Sector

Year	Reporting Complete / Estimated Percentage Complete (%)[a]	Shallow Alluvial System (acre-feet)				Lower Aquifer System (acre-feet)				Wells in Unassigned Aquifer Systems (acre-feet)				Total (acre-feet)
		AG	M&I	Dom	Sub-total	AG	M&I	Dom	Sub-total	AG	M&I	Dom	Sub-total	
CY 2016	Yes	1,365	0	1	1,366	9,442	2,356	0	*11,799*	2,168	197	32	*2,398*	**15,562**
CY 2017	Yes	1,372	0	1	1,372	10,497	2,294	0	*12,791*	1,735	204	43	*1,982*	**16,146**
CY 2018	Yes	920	0	1	921	9,625	1,627	0	*11,252*	2,294	206	41	*2,540*	**14,714**
CY 2019	Yes	619	0	0	619	8,737	2,109	0	*10,846*	2,773	132	41	*2,946*	**14,411**
CY 2020	Yes	883	0	1	883	9,269	2,086	0	*11,355*	3,591	212	73	*3,877*	**16,115**
WY 2021	Yes	892	0	1	893	10,989	2,207	0	*13,196*	3,690	173	30	*3,893*	**17,982**
WY 2022	Yes	384	0	0	385	8,554	2,123	0	*10,677*	3,856	214	65	*4,135*	**15,197**
WY 2023[b]	No/70%	513	0	1	514	5,235	1,553	0	*6,788*	2,484	141	38	*2,658*	**9,960**
WY 2024[c]														

Notes: AG = Agriculture; Dom = domestic; M&I = Municipal and Industrial; CY = Calendar Year (January 1 through December 31); WY = Water Year (October 1 through September 30)

[a] Qualifier indicates whether extraction reporting is complete for the given year. "Yes" indicates no additional reporting is anticipated. "No" indicates that additional reporting is anticipated. The percentage included after the "No" qualifier represents the estimated total percentage of operators who have reported extractions to FCGMA as of January 26, 2024.

[b] Groundwater extractions were updated upon receipt of additional data. FCGMA is evaluating outstanding extraction reports and anticipates completing this review during preparation of the final draft annual report.

[c] Groundwater extraction reporting not complete at the time of this reporting

Table 2-3. Reported Annual Groundwater Extractions in the ELPMA and Epworth Gravels Management Area by Aquifer System and Water Use Sector

Year	Reporting Complete / Estimated Percentage Complete (%)[a]	Epworth Gravels Aquifer (acre-feet)				Upper San Pedro Formation (acre-feet)				Fox Canyon Aquifer (acre-feet)				Grimes Canyon Aquifer (acre-feet)				Wells in Multiple or Unassigned Aquifers (acre-feet)				Total (acre-feet)[b]
		AG	M&I	Dom	Sub-total	AG	M&I	Dom	Sub-total	AG	M&I	Dom	Sub-total	AG	M&I	Dom	Sub-total	AG	M&I	Dom	Sub-total	
CY 2016	Yes	1,009	0	0	*1,009*	583	0	0	*583*	11,233	1,128	0	*12,361*	89	87	0	*176*	5,969	98	20	*6,087*	**20,216**
CY 2017	Yes	875	0	0	*875*	580	0	0	*580*	12,305	1,093	0	*13,398*	105	91	0	*197*	6,328	131	30	*6,489*	**21,539**
CY 2018	Yes	712	0	0	*712*	562	0	0	*562*	11,471	1,392	0	*12,863*	78	92	0	*171*	6,167	419	30	*6,616*	**20,924**
CY 2019	Yes	716	0	0	*716*	217	0	0	*217*	11,050	1,289	0	*12,339*	77	99	0	*177*	3,954	134	20	*4,109*	**17,557**
CY 2020	Yes	817	0	0	*817*	133	0	0	*133*	11,729	1,616	0	*13,345*	106	121	0	*228*	5,540	272	21	*5,833*	**20,356**
WY 2021	Yes	773	0	0	*773*	152	0	0	*152*	13,073	1,926	0	*14,998*	93	172	0	*266*	10,258	167	34	*10,459*	**26,648**
WY 2022	Yes	155	0	0	*155*	216	0	0	*216*	11,087	3,187	0	*14,274*	90	52	0	*142*	5,635	557	21	*6,213*	**21,002**
WY 2023[c]	No/70%	443	0	0	*443*	185	0	0	*185*	7,323	2,887	0	*10,210*	57	115	0	*173*	5,174	127	16	*5,316*	**16,327**
WY 2024[d]																						

Notes: AG = Agriculture; Dom = domestic; M&I = Municipal and Industrial; CY = Calendar Year (January 1 through December 31); WY = Water Year (October 1 through September 30)

[a] Qualifier indicates whether extraction reporting is complete for the given year. "Yes" indicates no additional reporting is anticipated. "No" indicates that additional reporting is anticipated. The percentage included after the "No" qualifier represents the estimated total percentage of operators who have reported extractions to FCGMA January 26, 2024

[b] CMWD extractions are included in the total extractions.

[c] Groundwater extractions were updated upon receipt of additional data. FCGMA is evaluating outstanding extraction reports and anticipates completing this review during preparation of the final draft annual report.

[d] Groundwater extraction reporting not complete at the time of this reporting.

2.4 Imported Water Supply

Imported water supplies consist of imported Metropolitan Water District of Southern California (State Water Project and/or Colorado River water) water provided by CMWD to local water purveyors and imported groundwater and Conejo Creek water provided by CWD. CMWD is the largest imported water supplier to the LPV, having provided approximately 97% of the imported water from water year 2016 through water year 2024 (Table 2-4).

CWD provided data using two different reporting periods: calendar year reporting for the period from 2016 through 2020, and water year reporting from 2021 through 2024. To convert imported water supply data from calendar year to water year, 25% of CWD's imported water from a given calendar year was assigned to the following water year, and 75% of the calendar year imported water was assigned to the current water year. This division, while approximate, is based on the monthly split between water year and calendar year.

Table 2-4. Total Imported Water Supplies in the LPV

Water Year	CMWD (Acre-Feet)						CWD (Acre-feet)								Total
	WLPMA		ELPMA			Sub-total	GW Pumped in PVB and used in LPV		GW Pumped in SRV and Tierra Rejada and used in LPV[b]		Imported from CMWD to ELPMA		Sub-total	Nonpotable water delivered for Ag[c]	
	M&I	Ag	M&I	Ag	ASR Injections[a]		M&I	Ag	M&I	Ag	M&I	Ag			
2016	697	762	5,210	1,966	946	9,581	10	13	21	29	54	76	203	122	**9,906**
2017	541	372	5,526	1,896	4,066	12,401	9	13	33	43	51	69	218	99	**12,718**
2018	1,011	772	6,296	2,298	2,056	12,433	10	13	33	45	53	71	225	97	**12,754**
2019	666	384	5,195	1,802	6,814	14,861	9	13	26	35	54	73	210	139	**15,210**
2020	544	379	5,460	1,884	2,866	11,133	11	15	17	24	69	90	226	132	**11,493**
2021	968	352	6,041	2,023	683	10,067	15	21	15	21	69	91	233	144	**10,444**
2022	506	347	4,720	1,602	1,057	8,232	20	28	20	82	49	64	262	103	**8,597**
2023	353	219	4,075	1,385	4,059	10,092	0	0	0	0	48	45	93	370	**10,555**
2024	373	210	4,522	1,519	955	7,573	38	36	74	7	8	28	32	74	**7,679**

Notes: M&I = Municipal and Industrial; Ag = Agriculture; ASR = Aquifer Storage and Recovery; NR = Not Reported, SRV = Santa Rosa Valley Basin, PVB = Pleasant Valley Basin
CWMD = Calleguas Municipal Water District; CWD = Camrosa Water District

[a] ASR injections are stored water in the ELPMA.

[b] In water year 2024, CWD began delivering groundwater pumped from the Tierra Rejada basin in the LPV for M&I and Ag.

[c] Nonpotable sources delivered by CWD in the LPV include a combination of Conejo Creek water, blended imported water, and non-potable water pumped from the Santa Rosa basin.

2.4.1 Recharge of Imported Water

Imported water was not purchased for recharge in the LPV in water year 2024.

2.4.2 CMWD Aquifer Storage and Recovery Project Operations

CMWD has injected water into the ELPMA since 1993 through their ASR program (FCGMA 2019). Additionally, as part of a program supported by the Metropolitan Water District of Southern California, CMWD historically delivered imported water to LPV users in lieu of groundwater pumping in both the WLPMA and ELPMA. In 2015, the end of the reporting period for the GSP, CMWD had accrued 25,192 AF of storage credits in the WLPMA and 11,398 AF of storage credits in the ELPMA (FCGMA 2019).

Table 2-5 summarizes CMWD's ASR operations for the period from 2016 through 2024. At the end of the 2024 water year, CMWD had accrued approximately 25,192 AF of storage credits in the WLPMA and 28,690 AF of storage credits in the ELPMA.

Table 2-5. CMWD Aquifer Storage and Recovery Program (Acre-Feet)

Year[a]	In Lieu Water Deliveries		Net ASR System Injection in ELPMA	Cumulative Storage[b]			ASR		Calc Net ASR System Injection in ELPMA
	WLPMA	ELPMA		WLPMA	ELPMA	Total	Injections	Extractions	
CY 2016	0	155	3,004	25,192	14,559	39,751	3,110	106	3,004
CY 2017	0	0	2,538	25,192	17,099	42,291	2,581	43	2,538
CY 2018	0	0	1,138	25,192	18,238	43,430	1,568	431	1,138
CY 2019	0	0	8,068	25,192	26,308	51,500	8,322	255	8,068
CY 2020	0	0	808	25,192	27,119	52,311	1,230	421	808
Transition Period									
2021	0	0	445	25,192	27,566	52,758	611	166	445
Transition Period									
WY 2022	0	0	-1,355	25,192	26,230	51,422	1,057	2,412	-1,355
WY 2023	0	0	1,936	25,192	28,168	53,360	4,059	2,123	1,936
WY 2024	0	0	522	25,192	28,690	53,882	955	432	522

Notes: CY = Calendar Year; WY = Water Year; Transition Period = Period from January 1, 2021, through September 30, 2021.

[a] Water year is defined as October 1 of the preceding year through September 30 of the current year. For example, WY 2021 is October 1, 2020, through September 30, 2021

[b] Includes CMWD's storage prior to 2016.

2.5 Total Water Available

Total available water was tabulated from the groundwater extractions reported in Tables 2-2 and 2-3, the imported water supplies reported in Table 2-4, and wastewater treated at the Moorpark Wastewater Treatment Plant (MWTP) and used by AG and M&I operators in the LPV. Total available water is reported in Table 2-5 by water year. To convert the reported groundwater pumping from calendar year to water year for 2016 through 2020, 25% of groundwater production from a given calendar year was assigned to the following water year, and 75% of the calendar year production was assigned to the current water year. This division, while approximate, is based on the monthly split between water year and calendar year, with January through September (75% of the calendar year) belonging to the current water year, and October through December (25% of the calendar year) belonging to the following water year.

Similar to Table 2-2 and 2-3, the groundwater extractions for water years 2021 and 2022 presented in Table 2-5 represent a combination of reported AMI-estimated extractions for the period from October 1, 2020, through September 30, 2022, and groundwater extractions for water year 2023 represent extractions that were reported to FCGMA.

Table 2-6. Total Water Available in the LPV

Water Year	Extraction Reporting Complete / Estimated Percentage Complete (%)[a]	Groundwater (acre-feet)			Recycled Water (acre-feet)		Imported Water (acre-feet)		Total[b] (acre-Feet)
		Ag	Dom	M&I	Ag	M&I	Ag	M&I	
2016	Yes	34,872	53	4,160	-	598	2,969	5,991	48,643
2017	Yes	35,610	69	4,031	-	765	2,492	6,160	49,127
2018	Yes	34,296	72	3,848	-	897	3,296	7,402	49,811
2019	Yes	31,474	64	3,770	-	823	2,446	5,950	44,527
2020	Yes	34,315	74	4,191	-	861	2,525	6,102	48,068
2021	Yes	39,920	64	4,645	-	1,244	2,652	7,108	55,633
2022[c]	Yes	30,767	24	3,362	-	949	2,226	5,315	40,643
2023[d]	No/70%	21,415	49	4,823	18	717	2,020	4,476	33,518
2024					51	825	2,249	4,971	

Notes: Ag = Agriculture; Dom = Domestic; M&I = Municipal and Industrial; - = Not Reported.

[a] Qualifier indicates whether extraction reporting is complete for the given year. "Yes" indicates no additional reporting is anticipated. "No" indicates that additional reporting is anticipated. The percentage included after the "No" qualifier represents the estimated total percentage of operators who have reported extractions to FCGMA January 26, 2024

[b] Total water available in the LPV does not include CMWD ASR injections which are considered stored water in the ELPMA. ASR injection totals are summarized in Table 2-4.

[c] Groundwater extraction reporting for 2023 was updated based on additional extraction reporting.

[d] Groundwater extraction reporting for 2024 were unavailable at the time of reporting.

2.6 Change in Groundwater Storage

Since adoption of the GSP, FCGMA has estimated the change in groundwater in storage in the LPV Basin annually using a series of linear regressions that relate measured groundwater elevations to simulated values of change in storage extracted from the Ventura Regional Groundwater Flow Model (VRGWFM; UWCD 2018) for the WLPMA and

the East Las Posas model (ELP model), which covers the entirety of ELPMA and Epworth Gravels Management Area (CMWD 2018, FCGMA 2022, 2023, 2024a). The linear regressions utilized results from the VRGWFM for the historical period from 1985 through 2015 and from the ELP model for the historical period from 1970 through 2015 (UWCD 2018, CMWD 2018).

As part of the 2025 Periodic Evaluation of the LPV Basin GSP (Periodic Evaluation), UWCD updated the VRGWFM to improve the hydrogeologic conceptual model of the Oxnard Subbasin and simulate groundwater conditions in the Oxnard Subbasin, Pleasant Valley Basin, and WLPMA through September 30, 2022 (FCGMA 2024b). Additionally, FCGMA extended the ELP model to simulate groundwater conditions in the ELPMA and Epworth Gravels Management Area through September 30, 2022. Accordingly, the estimates of change in groundwater in storage for the WLPMA and ELPMA have been updated through water year 2022 using the updated modeling results (Table 2-7a and 2-7b; Figures 2-15 through 2-19).

Because neither model simulates water years 2023 and 2024, the change in storage for those two water years was calculated using the series of linear regressions used in previous annual reports (FCGMA 2022, 2023, 2024a). The estimated change in storage calculated using this method differs from the estimates presented in the Periodic Evaluation, which were based on measured groundwater elevation changes from a smaller subset of wells. The series of linear regressions employed here better capture the spatial variability in storage change but are limited to the FCA (Table 2-7b; Figure 2-15).

Additionally, while further assessing the change in storage from the ELP model reported in the Periodic Evaluation, an error was identified in the sign of the reported change in storage values for each water year. The corrected values are reported for each principal aquifer of the ELPMA in Table 2-7b and shown in Figures 2-18 and 2-19.

2.6.1.1 West Las Posas Management Area

Lower Aquifer System

Between January 1, 2016, and September 30, 2022, the VRGWFM estimates that groundwater in storage in the LAS decreased by approximately 34,790 AF (Table 2-7a). Using the relationship between measured groundwater elevations and simulated change in storage, it is estimated that groundwater in storage in the FCA increased by approximately 11,000 AF in water year 2023 and 2024 (Table 2-7a; FCGMA 2022). Adding these values leads to an estimated cumulative reduction of groundwater in storage of the WLPMA of approximately 23,800 AF since 2015 (Table 2-7a). This equates to an average storage loss of approximately 2,650 AFY over the nine-year period from 2016 to 2024.

Table 2-7a. Annual Change and Cumulative Change in Storage (Acre-feet) in the Lower Aquifer System of the WLPMA

Water Year	Water Year Type	Method	Lower Aquifer System (LAS)	
			Annual (Acre-Feet)[b]	Cumulative Since 2015 (Acre-Feet)[b]
2016	Dry	VRGWFM	-6,480	-6,480
2017	Above Normal	VRGWFM	-3,160	-9,640
2018	Dry	VRGWFM	-8,150	-17,790

Table 2-7a. Annual Change and Cumulative Change in Storage (Acre-feet) in the Lower Aquifer System of the WLPMA

Water Year	Water Year Type	Method	Lower Aquifer System (LAS)	
			Annual (Acre-Feet)[b]	Cumulative Since 2015 (Acre-Feet)[b]
2019	Above Normal	VRGWFM	-1,370	-19,160
2020	Above Normal	VRGWFM	-2,490	-21,650
2021	Critically Dry	VRGWFM	-8,860	-30,510
2022	Below Normal	VRGWFM	-4,280	-34,790
2023	Wet	System of Linear Regressions[c]	6,610[d]	-28,180
2024	Wet	System of Linear Regressions[c]	4,370[d]	-23,810

Notes: VRGWFM = Ventura Regional Groundwater Flow Model (UWCD 2018).

[a] In the WLPMA, the Lower Aquifer System (LAS) consists of the FCA and the GCA.

[b] Values rounded to the nearest 10 acre-feet. Negative (-) values denote a reduction in groundwater in storage. Positive (+) values denote in increase in groundwater in storage.

[c] Technical methodology described in FCGMA (2022).

[d] Represents the change in storage only in the FCA.

2.6.1.2 East Las Posas and Epworth Gravels Management Areas

Between 2016 and 2022, the groundwater in storage decreased by approximately 3,260 AF in the Shallow Alluvial aquifer, FCA, and GCA of the ELPMA (Table 2-7b). Over the same period, groundwater in storage decreased in the Epworth Gravels aquifer[10] by approximately 1,100 AF (Table 2-7b). The total modeled change in storage between 2016 and 2022 for the principal aquifers in the ELP model was a reduction of approximately 4,360 AF (Table 2-7b).

The relationship between measured groundwater elevations and simulated change in storage suggests that groundwater in storage in the FCA increased by approximately 11,300 AF in water years 2023 and 2024 (Table 2-7b; FCGMA 2022). Based on this, since 2015, groundwater in storage in the FCA is estimated to have increased by approximately 8,600 AF (Table 2-7b). The change in storage estimates include imported water temporarily stored in the ELPMA through CMWD's ASR program. Over the 2016 to 2024 period, CMWD injected a net volume of approximately 17,100 AF of imported water into the ELPMA for temporary storage. These data suggest that, excluding the CMWD ASR operations, storage in the ELPMA declined by approximately 8,500 AF between 2016 and 2024.

[10] The Epworth Gravels aquifer is the only principal aquifer in the Epworth Gravels Management Area.

Table 2-7b. Annual Change and Cumulative Change in Storage (Acre-feet) in the ELPMA and Epworth Gravels

Water Year	Water Year Type	Method	Shallow Alluvial aquifer[a]		Fox Canyon Aquifer[a]		Grimes Canyon Aquifer[a]		Epworth Gravels Aquifer[a]	
			Annual (Acre-Feet)	Cumulative Since 2015 (Acre-Feet)	Annual (Acre-Feet)	Cumulative Since 2015 (Acre-Feet)	Annual (Acre-Feet)	Cumulative Since 2015 (Acre-Feet)	Annual (Acre-Feet)	Cumulative Since 2015 (Acre-Feet)
2016	Dry	ELP Model	-281	-281	-1,294	-1,294	-237	-237	73	73
2017	Above Normal	ELP Model	247	-34	2,124	830	195	-42	-173	-101
2018	Dry	ELP Model	-379	-413	-1,921	-1,092	-296	-338	-156	-257
2019	Above Normal	ELP Model	243	-170	5,962	4,870	456	118	44	-213
2020	Above Normal	ELP Model	173	3	-393	4,478	449	567	-184	-397
2021	Critically Dry	ELP Model	-35	-32	-4,167	311	-597	-30	-519	-916
2022	Below Normal	ELP Model	-179	-212	-2,991	-2,680	-336	-366	-182	-1,098
2023	Wet	System of Linear Regressions[b]	-	-	6,030	3,349	-	-	-	-
2024	Wet	System of Linear Regressions[b]	-	-	5,271	8,620	-	-	-	-

Notes: ELP Model = East Las Posas Model (CMWD 2018).

[a] Values differ from those presented in the Periodic Evaluation, which included an error in the sign of simulated storage change extracted from the ELP model. The values presented in this table have been corrected to account for the error in sign convention.

[b] Technical methodology described in FCGMA (2022).

3 GSP and Judgment Implementation Progress

The GSP for the LPV Basin was submitted to DWR in January 2020 and approved by DWR in January 2022. This is the sixth annual report prepared since the GSP was submitted. The GSP implementation progress described in this report covers work that began during development of the GSP as well as work that has been conducted since the GSP was submitted. FCGMA continues to engage with stakeholders as part of the GSP implementation efforts.

3.1 2025 Periodic Evaluation of the LPV Basin GSP

On December 13, 2024, the FCGMA Board of Directors adopted the Periodic Evaluation, which provides an assessment of progress towards sustainability in the LPV Basin, discusses new significant information since adoption of the GSP, includes recommendations that support project implementation and ongoing coordination with stakeholders, and summarizes key actions taken by FCGMA to support implementation of the GSP and Judgment. The key findings from the Periodic Evaluation are summarized below.

3.1.1 Progress towards Sustainability

Progress towards sustainability in the Periodic Evaluation was assessed using groundwater elevations measured across the entirety of the LPV Basin. These data indicate that:

- Groundwater elevations in the eastern portion of the WLPMA and northern portion of the ELPMA declined between water year 2015 and water year 2024. Elsewhere in the LPV Basin, where measured, groundwater elevations were either stable or increased between water years 2015 and 2024.
- Undesirable Results occurred in the eastern portion of the WLPMA, where groundwater elevations at well 02N20W06R01S were consistently measured below the minimum threshold between water year 2019 and water year 2024.

The periodic evaluation found that groundwater production exceeding the sustainable yield is the primary cause of groundwater level declines in the eastern WLPMA and northern ELPMA.

3.1.2 Significant New Information

Since adoption of the GSP, FCGMA and stakeholders in the LPV Basin have coordinated to improve understanding of future water supplies, expand the suite of projects that may increase the sustainable yield of the LPV Basin, and improve groundwater monitoring. These improvements have resulted in:

- Revised projections of recharge to the ELPMA from Arroyo Simi-Las Posas because the City of Simi Valley is no longer pursuing a program to increase recycled water usage within their service area and no longer plans to divert dewatering well discharges to a desalter for potable use. FCGMA anticipates that flows in Arroyo Simi-Las Posas will be higher than assumed in the GSP. These revised projections were incorporated into updated numerical modeling and were used to update estimates of the sustainable yield of the ELPMA.

- Incorporation of DWR's InSAR data into the GSP monitoring network to improve land subsidence monitoring in the LPV Basin.
- Expanded project suite to include: infrastructure improvements to Zone Mutual Water Company's water delivery infrastructure; construction and operation of the Moorpark Desalter facility; construction and operation of a storm water diversion and recharge facility along Arroyo Simi-Las Posas; installation of new dedicated monitoring wells; installation of pressure transducers in key wells; and implementation of a feasibility study to investigate the feasibility of providing supplemental water supplies to water deficit areas in the ELPMA.

3.1.3 Recommendations

Lastly, the Periodic Evaluation, with input from stakeholders and interested parties in the LPV Basin, included the following recommendations:

- Augment the current groundwater monitoring network to address data gaps identified in the GSP and Periodic Evaluation. This could include the construction of new dedicated monitoring wells and the development of formal agreements with partner agencies to ensure consistent and timely measurement of wells in the GSP monitoring network.
- Continue coordination and collaboration with agencies, stakeholders, and committees in the LPV Basin to support project implementation and effective management of the LPV Basin.
- Conduct additional technical studies to further quantify the relationship between pumping in the WLPMA and its incremental effect on seawater intrusion in the Oxnard Subbasin.
- Develop a long-term master plan to manage accountability and progress in advancing projects in the LPV Basin.

3.1.4 Actions Taken by FCGMA

FCGMA took multiple actions to address data gaps identified in the GSP and improve the agency's ability to sustainably manage the groundwater resources of the LPV Basin. These include:

- Adoption of resolutions to impose, and adjust, groundwater extraction fees and surcharge rates.
- Adoption of ordinances to establish, and modify, a fixed-extraction allocation that went into effect on October 1, 2021. These ordinances were subsequently superseded by the allocations established in the Judgment.
- Evaluation and analysis of data management system needs to implement the new allocation system.
- Evaluation of a replenishment fee to purchase water for delivery in lieu of groundwater production in the WLPMA.
- Pursuit of grant funding through DWR's Sustainable Groundwater Management Grant Program to support construction of additional monitoring wells and procurement of additional groundwater monitoring equipment. FCGMA was not awarded funds through this process.

The management actions listed above have largely been superseded by the requirements set forth in the Judgment.

3.2 Watermaster Activities

Since July 2023, FCGMA has led the following actions to support implementation of the Judgment:

- Appointed the LPV Policy Advisory Committee (PAC) to serve as the primary advisory body to the Watermaster on policy matters of non-technical nature to be considered by the Watermaster pertaining to sustainable groundwater management of the Basin.
- Appointed the LPV Technical Advisory Committee (TAC) as the primary advisory body to Watermaster on all matters requiring technical expertise to be considered by Watermaster relating to groundwater management and sustainability of the Basin.
- Established an initial Basin Assessment fee to fund management of the LPV.
- Consulted with the LPV TAC to inform development of the LPV Basin Optimization Yield Study, a study planned for completion in 2025 that will inform the Rampdown Rate required to achieve long-term groundwater sustainability by 2040.11
- Developed the initial draft LPV Basin Optimization Plan, which is designed to identify, evaluate, and prioritize projects that are "practical, reasonable, and cost-effective to implement prior to 2040 to maintain the Operating Yield at 40,000 [acre-feet per year] AFY or as close thereto as achievable" (Judgment §5.3).[12]
- Approved a paid PAC administrator at the request of the PAC and Court's direction.
- Developed a budget for initial Watermaster Activities.
- Collected groundwater use and extraction data to inform basin management.
- Developed a Watermaster database.
- Developed a dedicated Watermaster website that hosts the Judgment and associated exhibits, contact information on record with Watermaster, Annual Allocations, PAC and TAC meeting schedules, agendas and minutes, information on Basin Assessments, and other general information.

Additionally, the Judgment adjudicated water rights in the LPV and established an allocation system based on those water rights. The Judgment allocations supersede the allocations developed and adopted by FCGMA in 2020. The Judgment grants four types of allocations - Agricultural, Commercial, Domestic, and Mutual Water Company Allocations – that are based on a Landowners' Overlying Rights and the amount of groundwater used rather than the amount of groundwater extracted. The initial allocations, which were implemented by the Watermaster in water year 2024, are based on the LPVB's Operating Yield. FCGMA is evaluating the data management system needs to implement the allocation system established through the Judgment.

[11] The Judgment defines Rampdown Rate as, "The rate of Rampdown beginning in Water Year 2025 and each Water Year thereafter, which will result from the Basin Optimization Study", and defines that the Rampdown Rate shall be calculated, "by dividing the amount of any deficit between the then-effective Operating Yield (e.g. 40,000 AFY) and the Basin Optimization Yield by fifteen (i.e. fifteen annual increments)".

[12] The Judgment defines the "Operating Yield" as the cumulative amount of Allocated Groundwater that may be sustainably Extracted from the Basin for Use in any particular Water Year under the terms of this Judgment, excluding the Use of any Groundwater pursuant to a right of Carryover. Consistent with the definition of "Total Safe Yield" in the Phase 1 Order, the components of the Operating Yield include all native and non-native sources of water within the Basin, or within either subbasin (as the contexts requires), presently and in the future, including native Groundwater, surface water underflow, Return Flows from the use of imported water within the Basin, recharge from treated wastewater, recharge from septic systems, storm water recharge (intentional or otherwise), recharge from natural and non-natural sources originating inside or outside the Basin, excepting augmented yield physically existing within, and recoverable from, the Basin as a result of the Calleguas ASR Project, if any.

3.3 Progress on Basin Optimization Plan

As outlined in the Judgment, FCGMA, in consultation with the LPV Policy Advisory Committee (PAC) and Technical Advisory Committee (TAC), is responsible for developing a Basin Optimization Plan for the LPV. The Basin Optimization Plan is designed to identify, evaluate, and prioritize projects that are "practical, reasonable, and cost-effective to implement prior to 2040 to maintain the Operating Yield at 40,000 [acre-feet per year] AFY or as close thereto as achievable" (Judgment §5.3). Consistent with this objective, the Basin Optimization Plan is required to include:

- Criteria for determining the priority and feasibility of each Basin Optimization Project;
- A description of Basin Optimization Projects;
- An analysis of whether any of the Basin Optimization Projects (i) are consistent with SGMA and the achievement of Sustainable Groundwater Management, and (ii) will prevent or alleviate, or cause or exacerbate, Undesirable Results or Material Injury;
- A prioritization schedule of the Basin Optimization Projects to be implemented;
- A schedule for the Basin Optimization Projects which are to be evaluated, scoped, designed, financed, or developed; and
- A five-year budget for the costs of capital improvements, and operation and maintenance (O&M), of the Basin Optimization projects.

On December 9, 2024, FCGMA submitted the initial draft Basin Optimization Plan for review and consultation to the LPV PAC and TAC. The initial draft Basin Optimization Plan evaluates a total of 10 projects in the LPV that are designed to:

- Increase the sustainable yield of the LPV Basin;
- Provide a new source of water supply to the LPV Basin;
- Improve water quality management of the LPV Basin; and/or
- Address data gaps identified in the GSP and 2025 Periodic Evaluation of the LPV GSP.

FCGMA anticipates developing fees to support implementation of a subset of these projects in water year 2025.

4 References

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5 Figures

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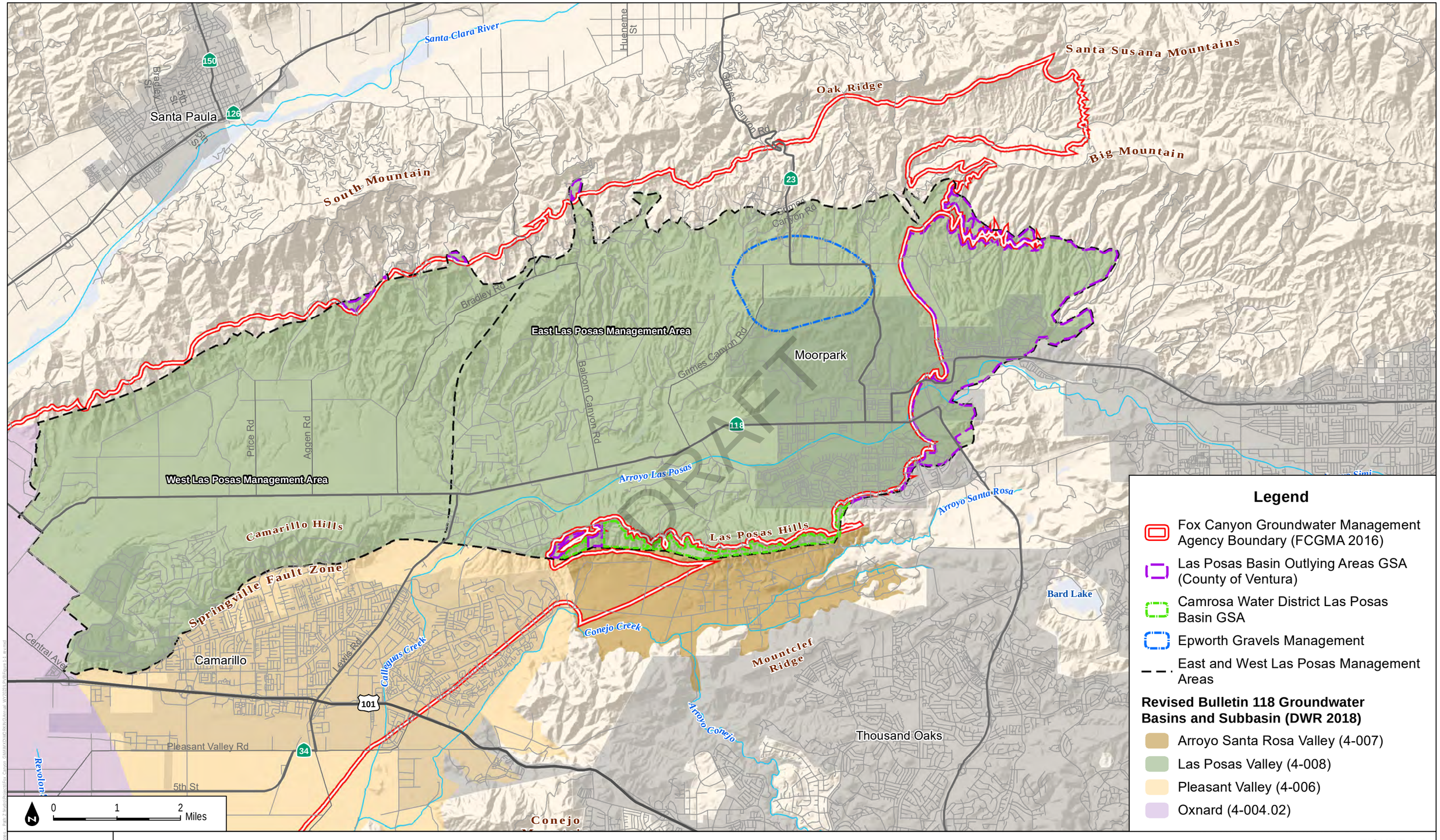

Legend

- Fox Canyon Groundwater Management Agency Boundary (FCGMA 2016)
- Las Posas Basin Outlying Areas GSA (County of Ventura)
- Camrosa Water District Las Posas Basin GSA
- Epworth Gravels Management
- East and West Las Posas Management Areas

Revised Bulletin 118 Groundwater Basins and Subbasin (DWR 2018)

- Arroyo Santa Rosa Valley (4-007)
- Las Posas Valley (4-008)
- Pleasant Valley (4-006)
- Oxnard (4-004.02)

SOURCE: DWR; Ventura County

FIGURE 1-1

Vicinity Map for the Las Posas Valley Basin

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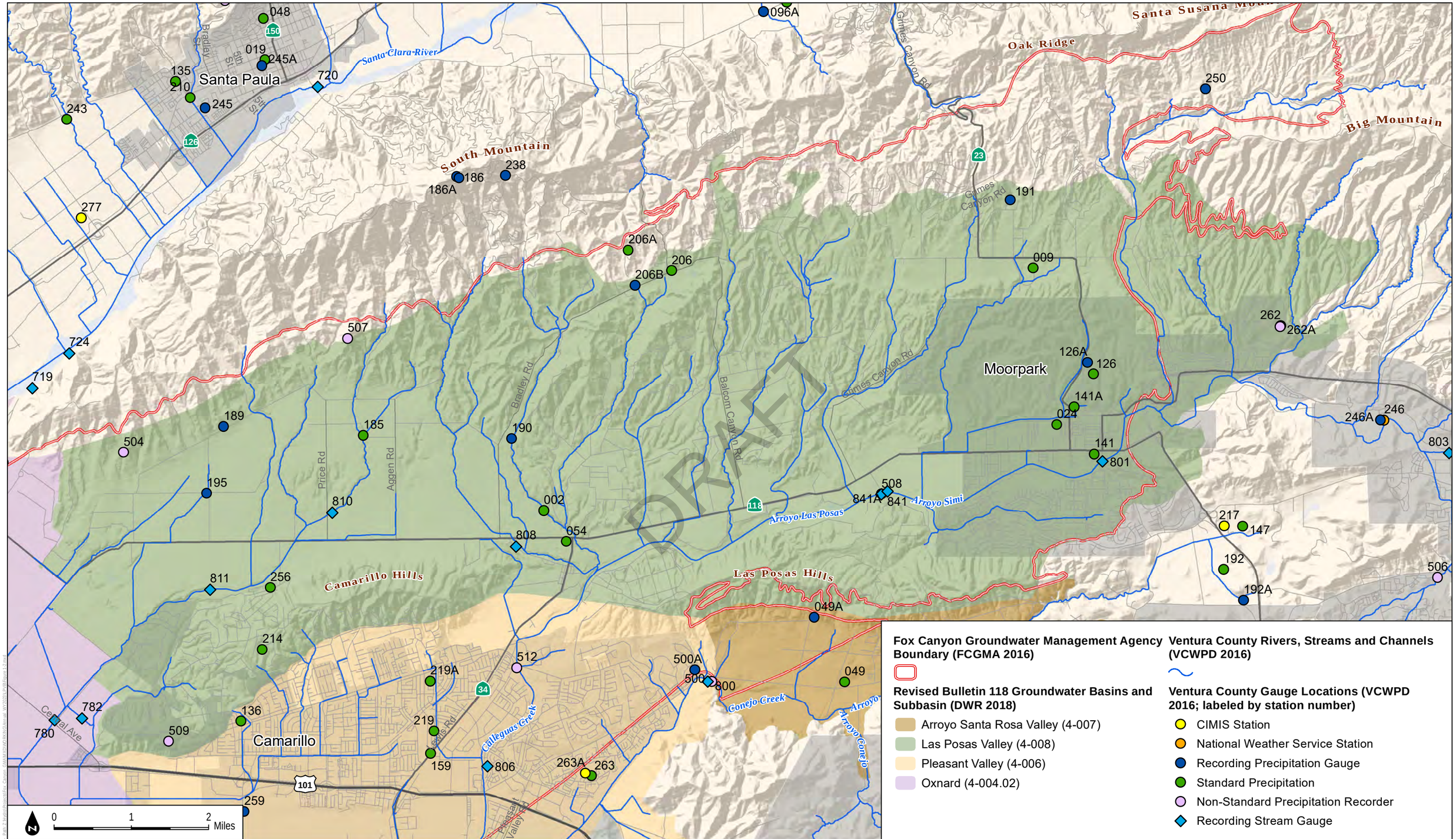

Fox Canyon Groundwater Management Agency Boundary (FCGMA 2016)

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- Arroyo Santa Rosa Valley (4-007)
- Las Posas Valley (4-008)
- Pleasant Valley (4-006)
- Oxnard (4-004.02)

Ventura County Rivers, Streams and Channels (VCWPD 2016)

Ventura County Gauge Locations (VCWPD 2016; labeled by station number)

- CIMIS Station
- National Weather Service Station
- Recording Precipitation Gauge
- Standard Precipitation
- Non-Standard Precipitation Recorder
- Recording Stream Gauge

SOURCE: DWR; Ventura County; VCWPD

FIGURE 1-2

Precipitation and Stream Gauges in the Las Posas Valley Basin

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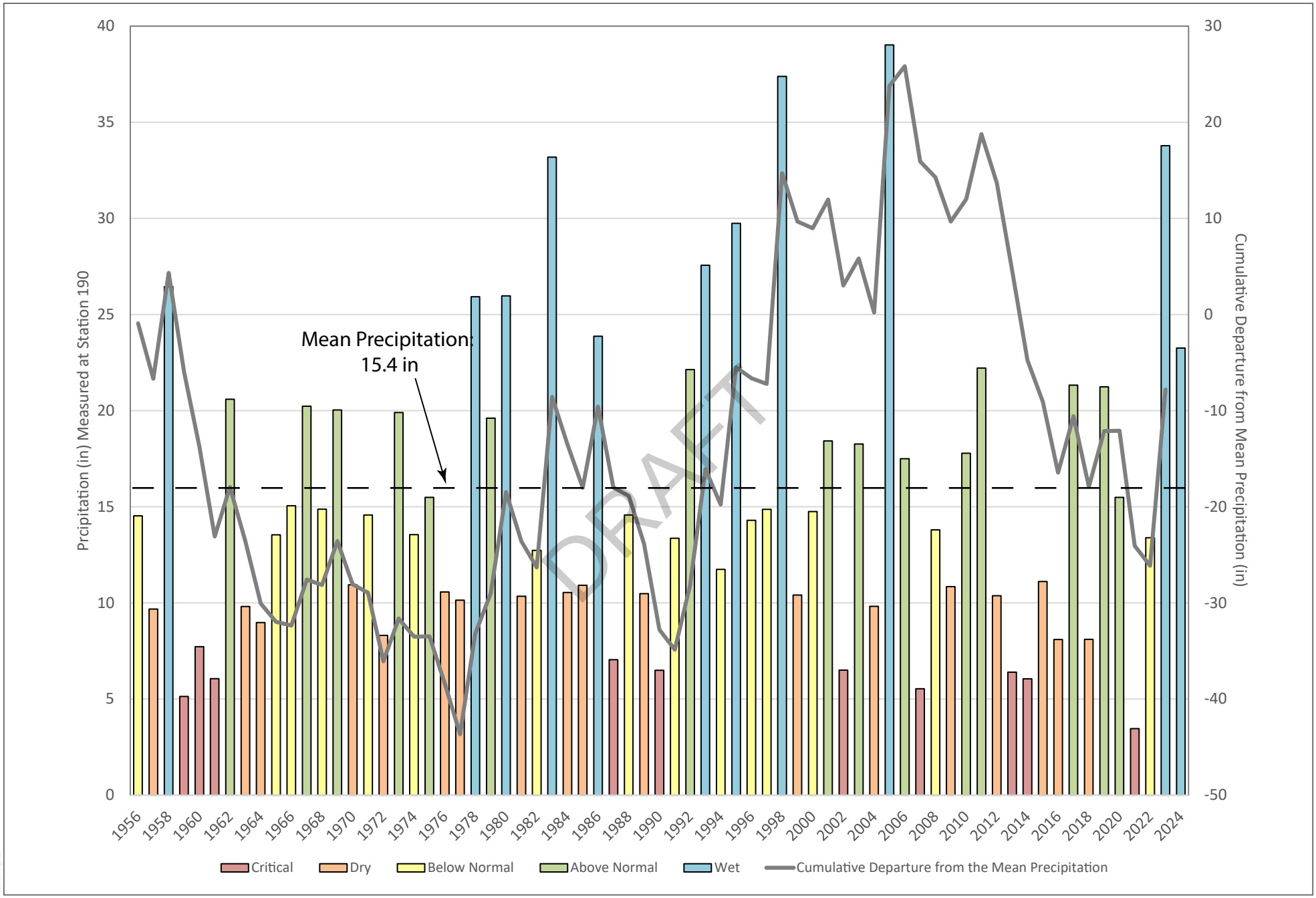

Note: Water year is October 1 through September 30. Water year type is based on the percentage of the water year precipitation compared to the mean precipitation. Types are defined as: Critical (<50% of mean), Dry (>50% to <75% of man), Below Normal (>75% to <100% of mean), Above Normal (>100% to <150% of mean), and Wet (>150% of mean).

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FIGURE 1-3

Las Posas Valley Basin Historical Water Year Precipitation

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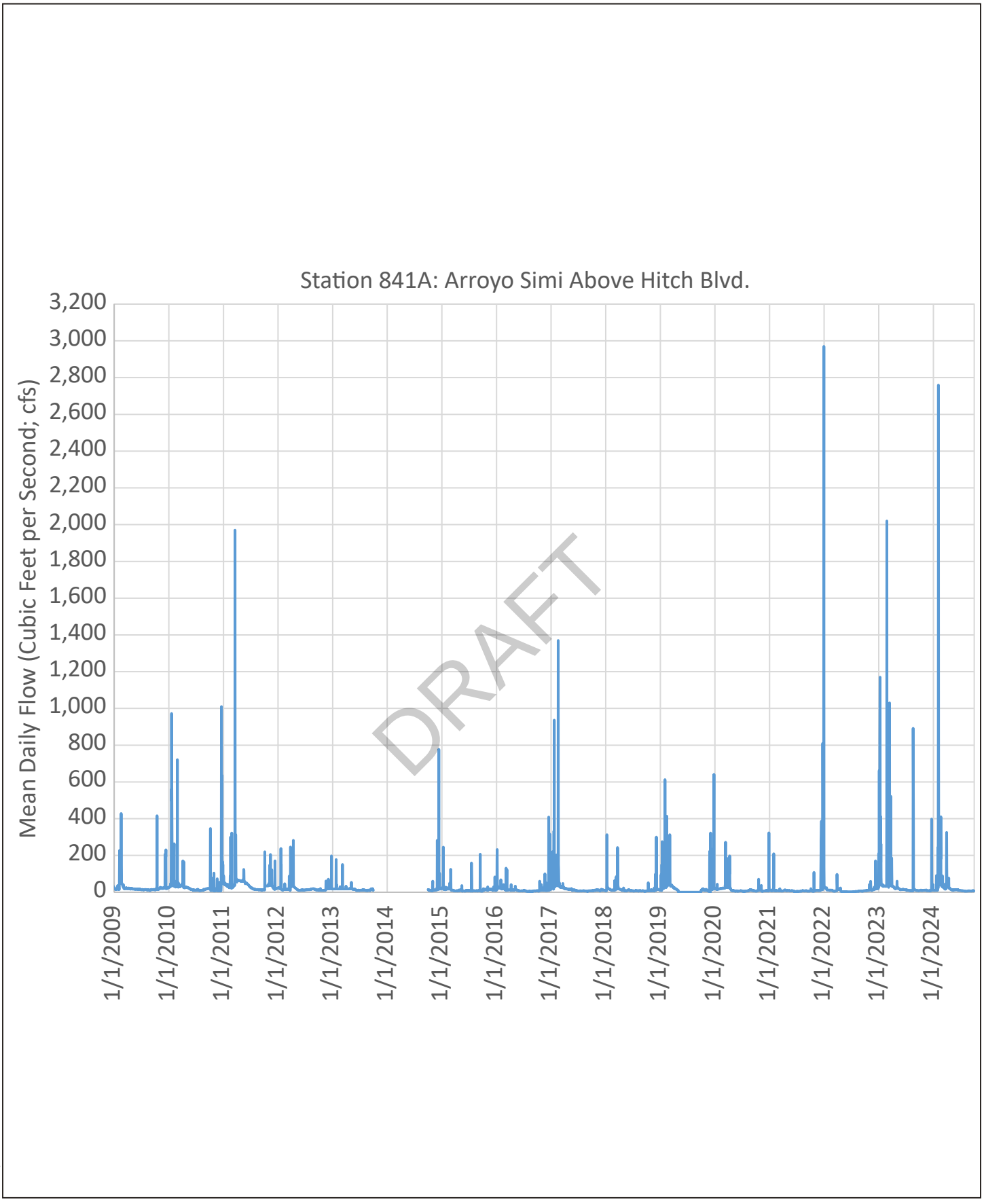

SOURCE: Ventura County Watershed Protection District (VCWPD) Hydrologic Data Server (https://www.vcwatershed.net/hydrodata/)

FIGURE 1-4

Las Posas Valley Basin Stream Gauge Data

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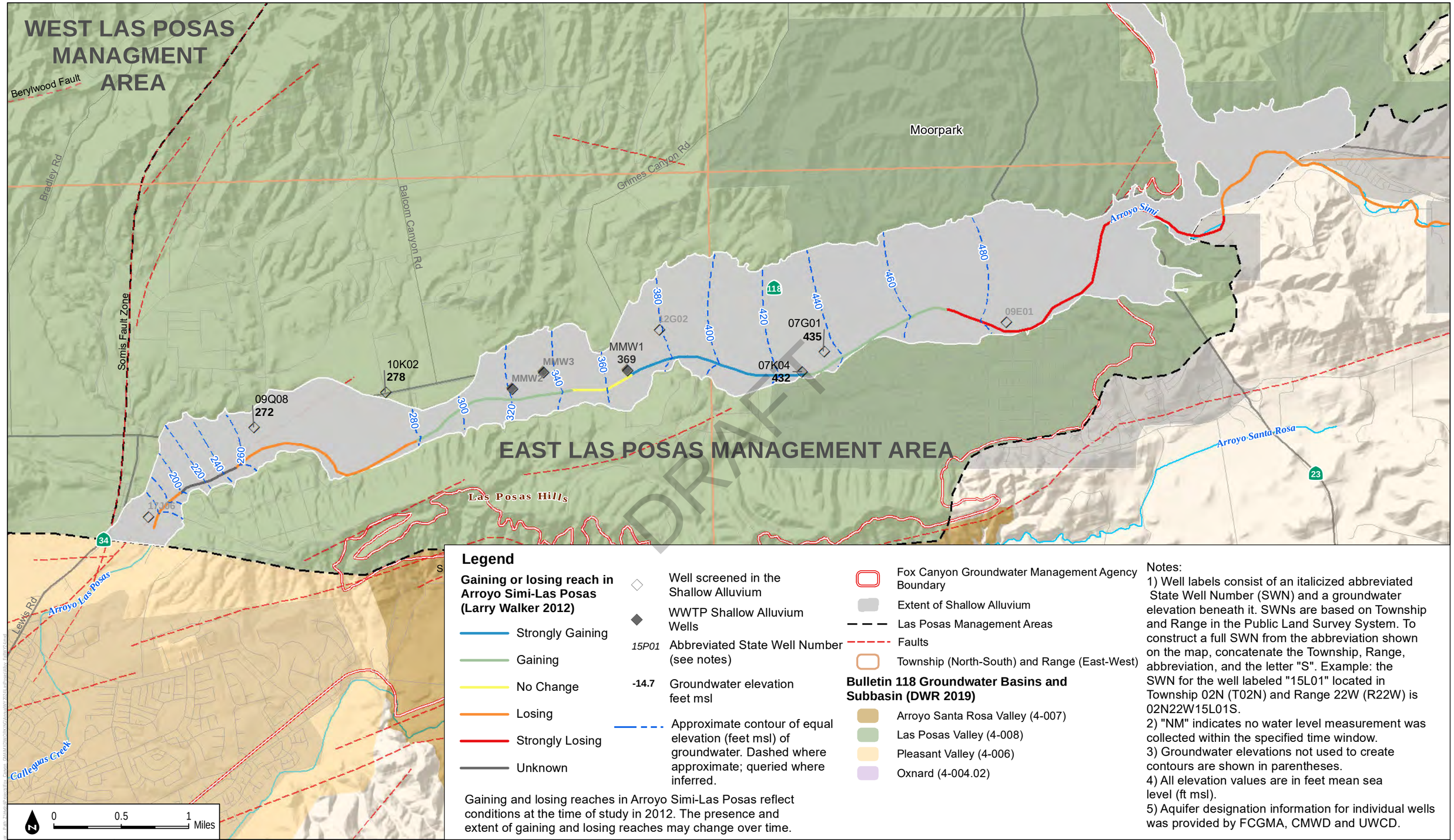

Legend

Gaining or losing reach in Arroyo Simi-Las Posas (Larry Walker 2012)

- Strongly Gaining
- Gaining
- No Change
- Losing
- Strongly Losing
- Unknown

- Well screened in the Shallow Alluvium
- WWTP Shallow Alluvium Wells
- *15P01* Abbreviated State Well Number (see notes)
- -14.7 Groundwater elevation feet msl
- Approximate contour of equal elevation (feet msl) of groundwater. Dashed where approximate; queried where inferred.

- Fox Canyon Groundwater Management Agency Boundary
- Extent of Shallow Alluvium
- Las Posas Management Areas
- Faults
- Township (North-South) and Range (East-West)

Bulletin 118 Groundwater Basins and Subbasin (DWR 2019)

- Arroyo Santa Rosa Valley (4-007)
- Las Posas Valley (4-008)
- Pleasant Valley (4-006)
- Oxnard (4-004.02)

Gaining and losing reaches in Arroyo Simi-Las Posas reflect conditions at the time of study in 2012. The presence and extent of gaining and losing reaches may change over time.

Notes:
1) Well labels consist of an italicized abbreviated State Well Number (SWN) and a groundwater elevation beneath it. SWNs are based on Township and Range in the Public Land Survey System. To construct a full SWN from the abbreviation shown on the map, concatenate the Township, Range, abbreviation, and the letter "S". Example: the SWN for the well labeled "15L01" located in Township 02N (T02N) and Range 22W (R22W) is 02N22W15L01S.
2) "NM" indicates no water level measurement was collected within the specified time window.
3) Groundwater elevations not used to create contours are shown in parentheses.
4) All elevation values are in feet mean sea level (ft msl).
5) Aquifer designation information for individual wells was provided by FCGMA, CMWD and UWCD.

SOURCE: DWR; Ventura County; UWCD; CMWD

FIGURE 2-1

Groundwater Elevation Contours in the Shallow Alluvial Aquifer, October 1 to 31, 2023

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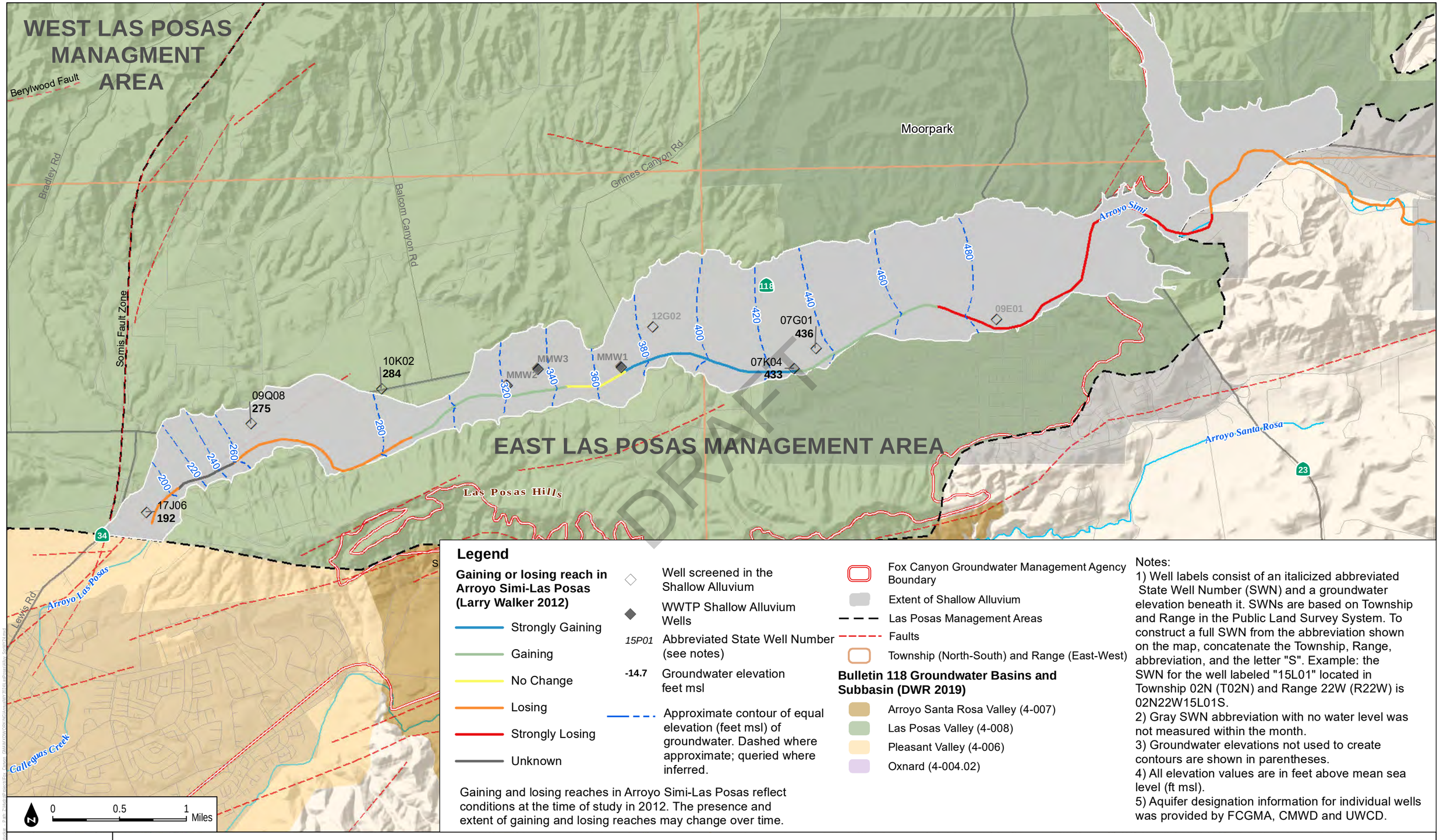

Legend

Gaining or losing reach in Arroyo Simi-Las Posas (Larry Walker 2012)

- Strongly Gaining
- Gaining
- No Change
- Losing
- Strongly Losing
- Unknown

- Well screened in the Shallow Alluvium
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- *15P01* Abbreviated State Well Number (see notes)
- **-14.7** Groundwater elevation feet msl
- Approximate contour of equal elevation (feet msl) of groundwater. Dashed where approximate; queried where inferred.

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- Oxnard (4-004.02)

Notes:
1) Well labels consist of an italicized abbreviated State Well Number (SWN) and a groundwater elevation beneath it. SWNs are based on Township and Range in the Public Land Survey System. To construct a full SWN from the abbreviation shown on the map, concatenate the Township, Range, abbreviation, and the letter "S". Example: the SWN for the well labeled "15L01" located in Township 02N (T02N) and Range 22W (R22W) is 02N22W15L01S.
2) Gray SWN abbreviation with no water level was not measured within the month.
3) Groundwater elevations not used to create contours are shown in parentheses.
4) All elevation values are in feet above mean sea level (ft msl).
5) Aquifer designation information for individual wells was provided by FCGMA, CMWD and UWCD.

SOURCE: DWR; Ventura County; UWCD; CMWD

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FIGURE 2-2

Groundwater Elevation Contours in the Shallow Alluvial Aquifer, March 1 to 31, 2024

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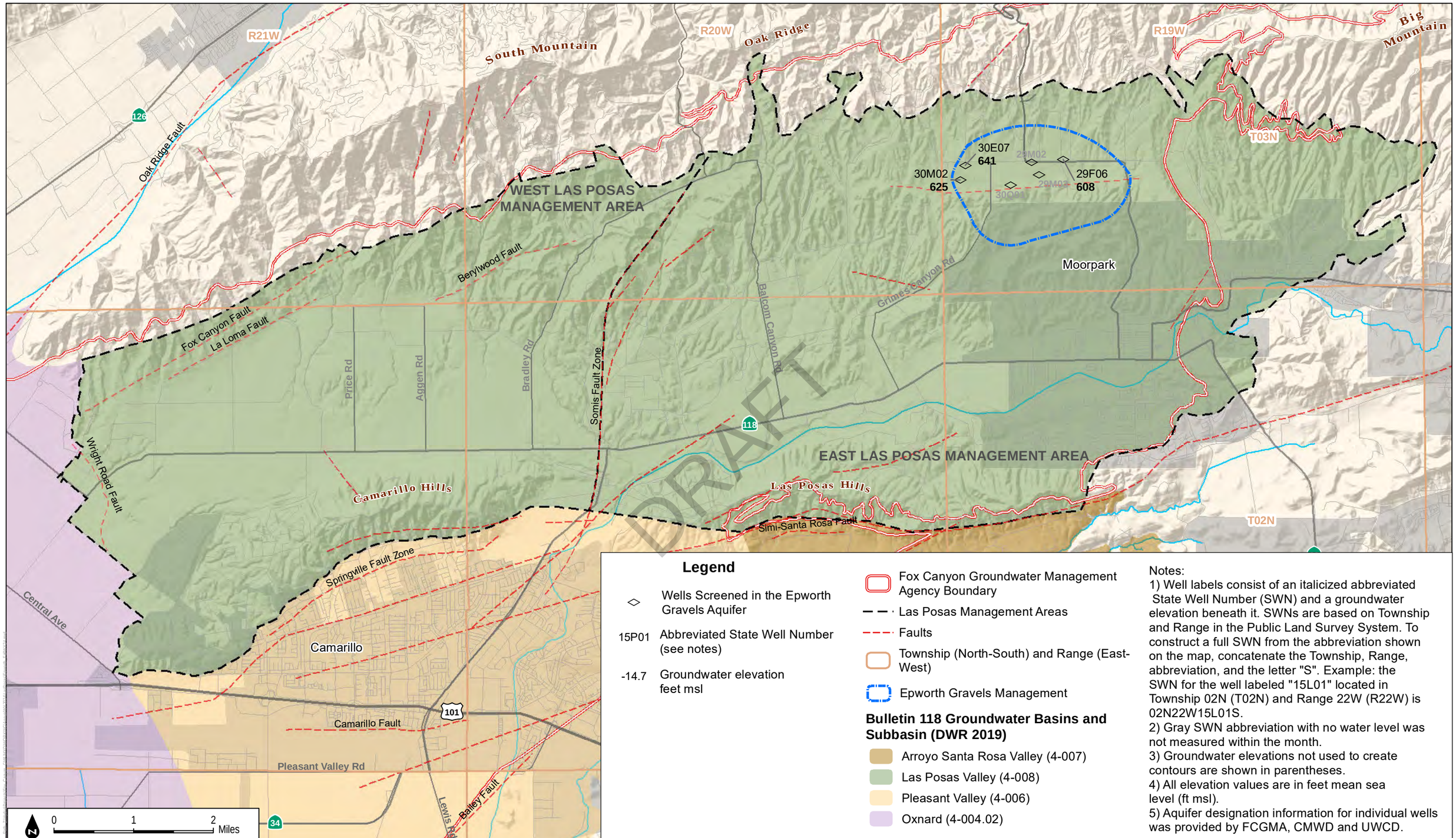

Legend

- ◇ Wells Screened in the Epworth Gravels Aquifer
- 15P01 Abbreviated State Well Number (see notes)
- -14.7 Groundwater elevation feet msl
- Fox Canyon Groundwater Management Agency Boundary
- Las Posas Management Areas
- Faults
- Township (North-South) and Range (East-West)
- Epworth Gravels Management

Bulletin 118 Groundwater Basins and Subbasin (DWR 2019)

- Arroyo Santa Rosa Valley (4-007)
- Las Posas Valley (4-008)
- Pleasant Valley (4-006)
- Oxnard (4-004.02)

Notes:
1) Well labels consist of an italicized abbreviated State Well Number (SWN) and a groundwater elevation beneath it. SWNs are based on Township and Range in the Public Land Survey System. To construct a full SWN from the abbreviation shown on the map, concatenate the Township, Range, abbreviation, and the letter "S". Example: the SWN for the well labeled "15L01" located in Township 02N (T02N) and Range 22W (R22W) is 02N22W15L01S.
2) Gray SWN abbreviation with no water level was not measured within the month.
3) Groundwater elevations not used to create contours are shown in parentheses.
4) All elevation values are in feet mean sea level (ft msl).
5) Aquifer designation information for individual wells was provided by FCGMA, CMWD and UWCD.

SOURCE: DWR; Ventura County; UWCD; CMWD

FIGURE 2-3

Groundwater Elevation Contours in the Epworth Gravels Aquifer, October 1 to October 31, 2023

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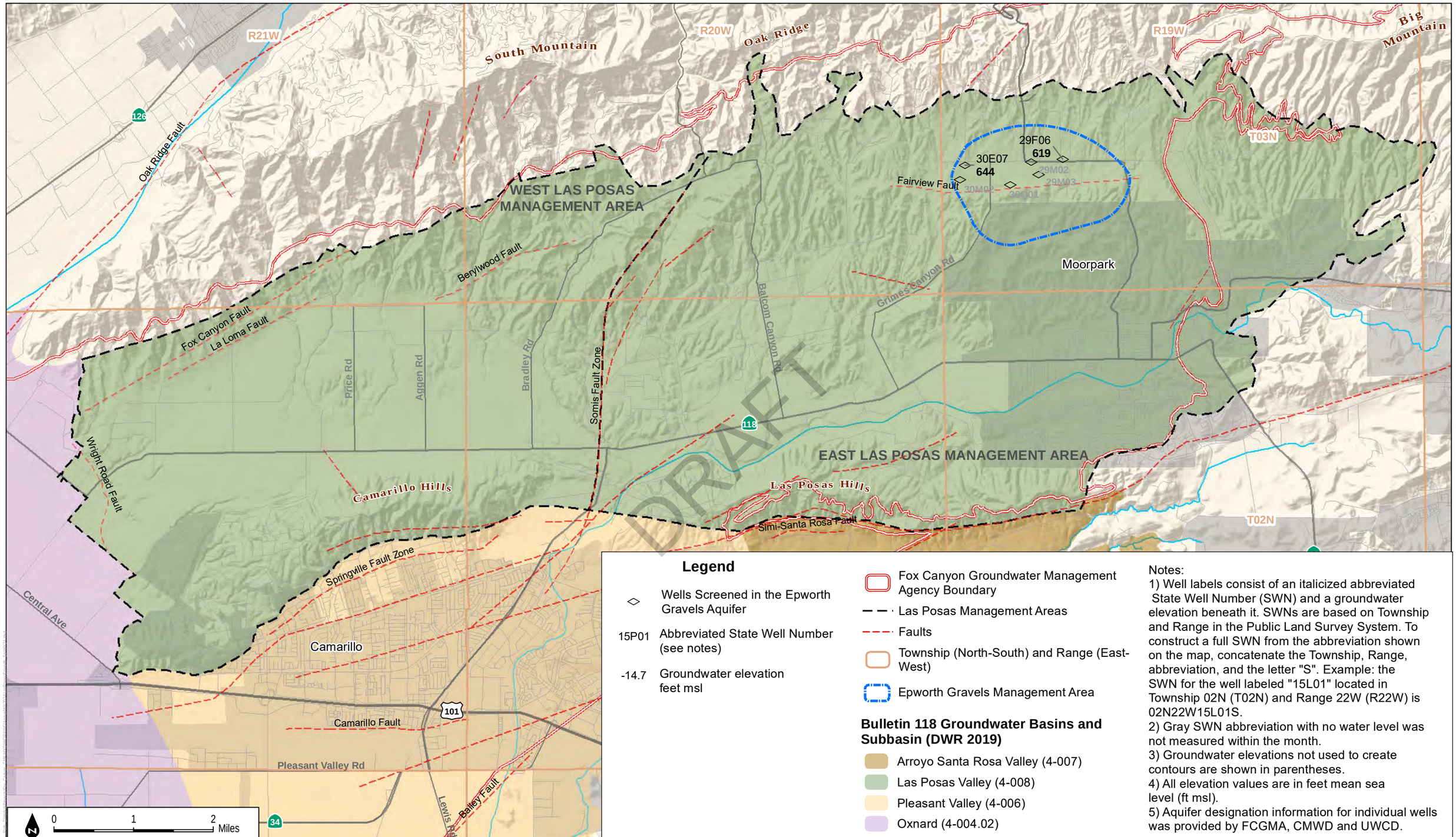

Legend

- ◇ Wells Screened in the Epworth Gravels Aquifer
- 15P01 Abbreviated State Well Number (see notes)
- -14.7 Groundwater elevation feet msl
- Fox Canyon Groundwater Management Agency Boundary
- Las Posas Management Areas
- Faults
- Township (North-South) and Range (East-West)
- Epworth Gravels Management Area

Bulletin 118 Groundwater Basins and Subbasin (DWR 2019)

- Arroyo Santa Rosa Valley (4-007)
- Las Posas Valley (4-008)
- Pleasant Valley (4-006)
- Oxnard (4-004.02)

Notes:
1) Well labels consist of an italicized abbreviated State Well Number (SWN) and a groundwater elevation beneath it. SWNs are based on Township and Range in the Public Land Survey System. To construct a full SWN from the abbreviation shown on the map, concatenate the Township, Range, abbreviation, and the letter "S". Example: the SWN for the well labeled "15L01" located in Township 02N (T02N) and Range 22W (R22W) is 02N22W15L01S.
2) Gray SWN abbreviation with no water level was not measured within the month.
3) Groundwater elevations not used to create contours are shown in parentheses.
4) All elevation values are in feet mean sea level (ft msl).
5) Aquifer designation information for individual wells was provided by FCGMA, CMWD and UWCD.

SOURCE: DWR; Ventura County; UWCD; CMWD

FIGURE 2-4

Groundwater Elevation Contours in the Epworth Gravels Aquifer, March 1 to March 31, 2024

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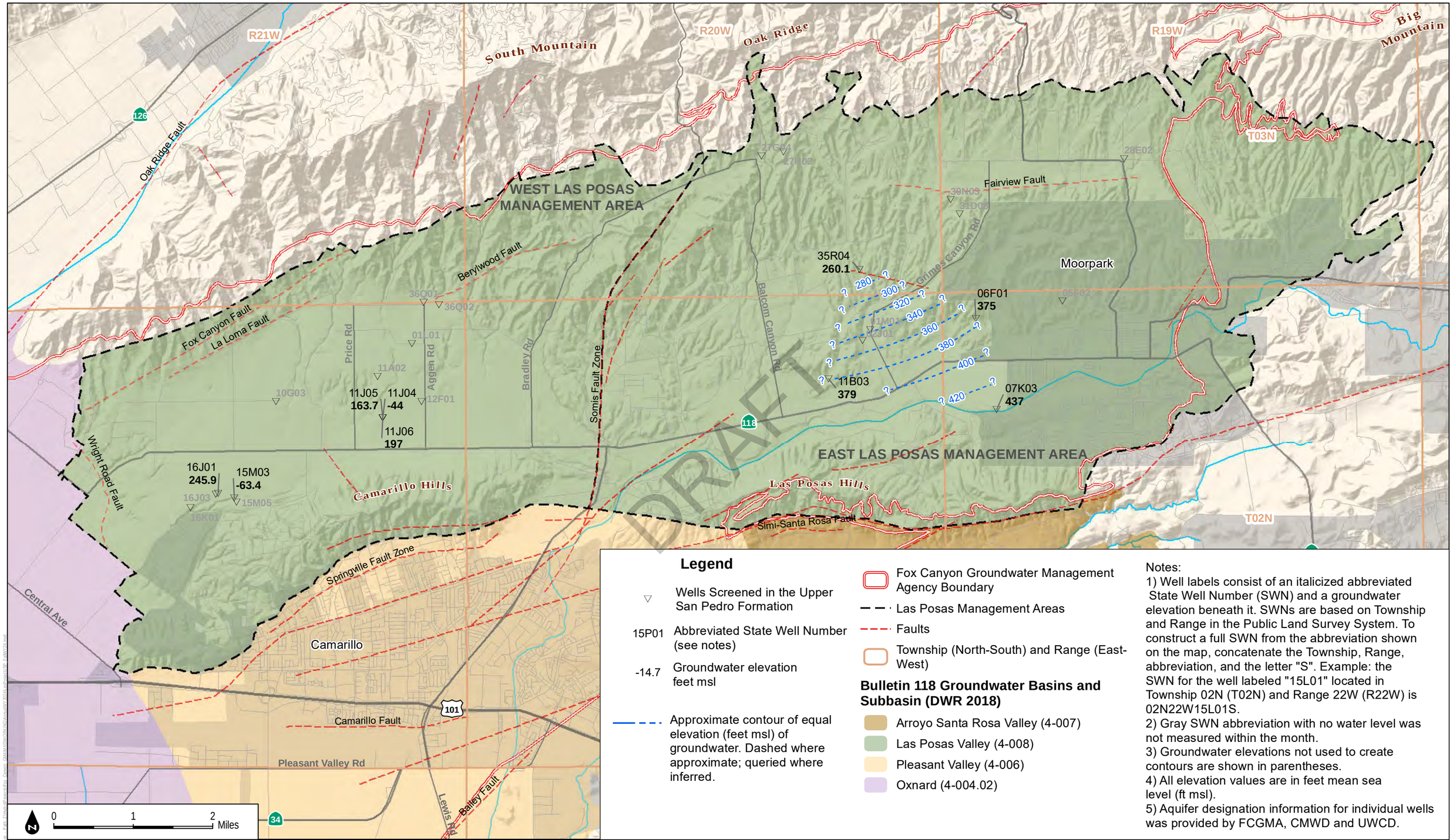

Legend

- ▽ Wells Screened in the Upper San Pedro Formation
- 15P01 Abbreviated State Well Number (see notes)
- -14.7 Groundwater elevation feet msl
- Approximate contour of equal elevation (feet msl) of groundwater. Dashed where approximate; queried where inferred.
- Fox Canyon Groundwater Management Agency Boundary
- Las Posas Management Areas
- Faults
- Township (North-South) and Range (East-West)

Bulletin 118 Groundwater Basins and Subbasin (DWR 2018)

- Arroyo Santa Rosa Valley (4-007)
- Las Posas Valley (4-008)
- Pleasant Valley (4-006)
- Oxnard (4-004.02)

Notes:
1) Well labels consist of an italicized abbreviated State Well Number (SWN) and a groundwater elevation beneath it. SWNs are based on Township and Range in the Public Land Survey System. To construct a full SWN from the abbreviation shown on the map, concatenate the Township, Range, abbreviation, and the letter "S". Example: the SWN for the well labeled "15L01" located in Township 02N (T02N) and Range 22W (R22W) is 02N22W15L01S.
2) Gray SWN abbreviation with no water level was not measured within the month.
3) Groundwater elevations not used to create contours are shown in parentheses.
4) All elevation values are in feet mean sea level (ft msl).
5) Aquifer designation information for individual wells was provided by FCGMA, CMWD and UWCD.

SOURCE: DWR; Ventura County; UWCD; CMWD

FIGURE 2-5

Groundwater Elevation Contours in the Upper San Pedro Aquifer, October 1 to October 31, 2023

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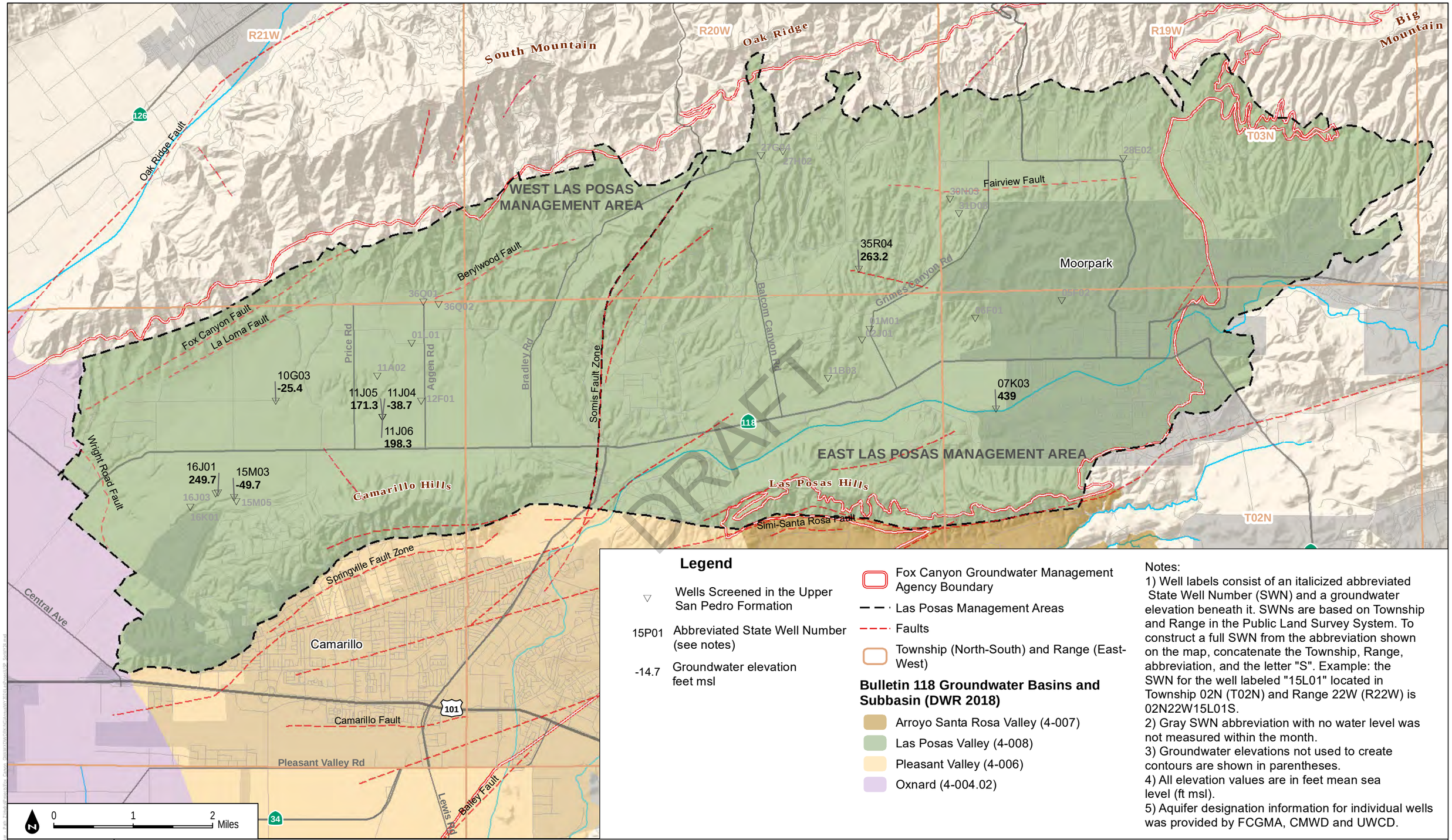

Legend

- ▽ Wells Screened in the Upper San Pedro Formation
- 15P01 Abbreviated State Well Number (see notes)
- -14.7 Groundwater elevation feet msl
- Fox Canyon Groundwater Management Agency Boundary
- Las Posas Management Areas
- Faults
- Township (North-South) and Range (East-West)

Bulletin 118 Groundwater Basins and Subbasin (DWR 2018)

- Arroyo Santa Rosa Valley (4-007)
- Las Posas Valley (4-008)
- Pleasant Valley (4-006)
- Oxnard (4-004.02)

Notes:
1) Well labels consist of an italicized abbreviated State Well Number (SWN) and a groundwater elevation beneath it. SWNs are based on Township and Range in the Public Land Survey System. To construct a full SWN from the abbreviation shown on the map, concatenate the Township, Range, abbreviation, and the letter "S". Example: the SWN for the well labeled "15L01" located in Township 02N (T02N) and Range 22W (R22W) is 02N22W15L01S.
2) Gray SWN abbreviation with no water level was not measured within the month.
3) Groundwater elevations not used to create contours are shown in parentheses.
4) All elevation values are in feet mean sea level (ft msl).
5) Aquifer designation information for individual wells was provided by FCGMA, CMWD and UWCD.

SOURCE: DWR; Ventura County; UWCD; CMWD

FIGURE 2-6

Groundwater Elevation Contours in the Upper San Pedro Aquifer, March 1 to March 31, 2024

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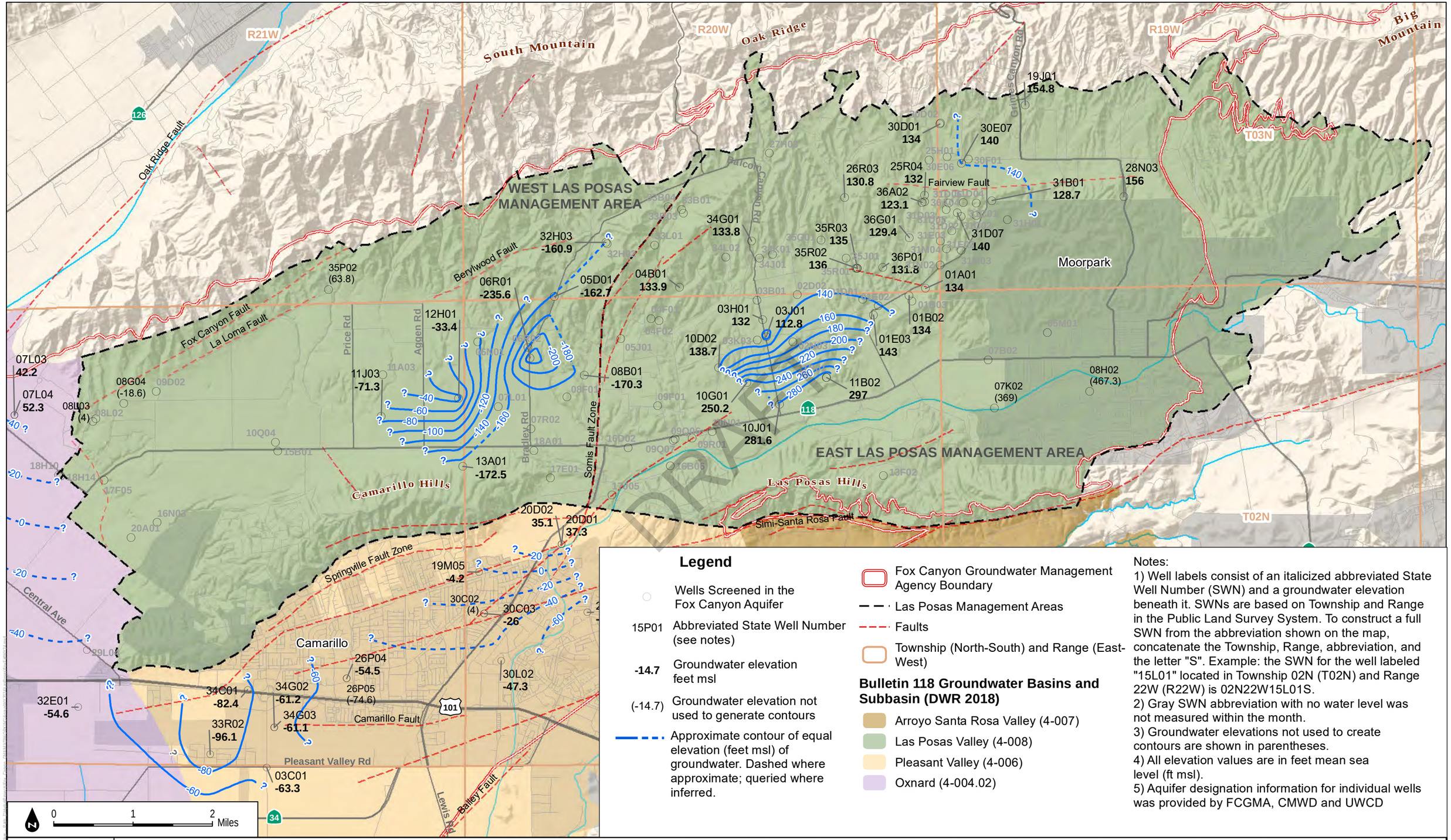

Legend

- Wells Screened in the Fox Canyon Aquifer
- 15P01 — Abbreviated State Well Number (see notes)
- -14.7 — Groundwater elevation feet msl
- (-14.7) — Groundwater elevation not used to generate contours
- Approximate contour of equal elevation (feet msl) of groundwater. Dashed where approximate; queried where inferred.
- Fox Canyon Groundwater Management Agency Boundary
- Las Posas Management Areas
- Faults
- Township (North-South) and Range (East-West)

Bulletin 118 Groundwater Basins and Subbasin (DWR 2018)

- Arroyo Santa Rosa Valley (4-007)
- Las Posas Valley (4-008)
- Pleasant Valley (4-006)
- Oxnard (4-004.02)

Notes:
1) Well labels consist of an italicized abbreviated State Well Number (SWN) and a groundwater elevation beneath it. SWNs are based on Township and Range in the Public Land Survey System. To construct a full SWN from the abbreviation shown on the map, concatenate the Township, Range, abbreviation, and the letter "S". Example: the SWN for the well labeled "15L01" located in Township 02N (T02N) and Range 22W (R22W) is 02N22W15L01S.
2) Gray SWN abbreviation with no water level was not measured within the month.
3) Groundwater elevations not used to create contours are shown in parentheses.
4) All elevation values are in feet mean sea level (ft msl).
5) Aquifer designation information for individual wells was provided by FCGMA, CMWD and UWCD

SOURCE: DWR; Ventura County; UWCD; CMWD

FIGURE 2-7

Groundwater Elevation Contours in the Fox Canyon Aquifer, October 1 to October 31, 2023

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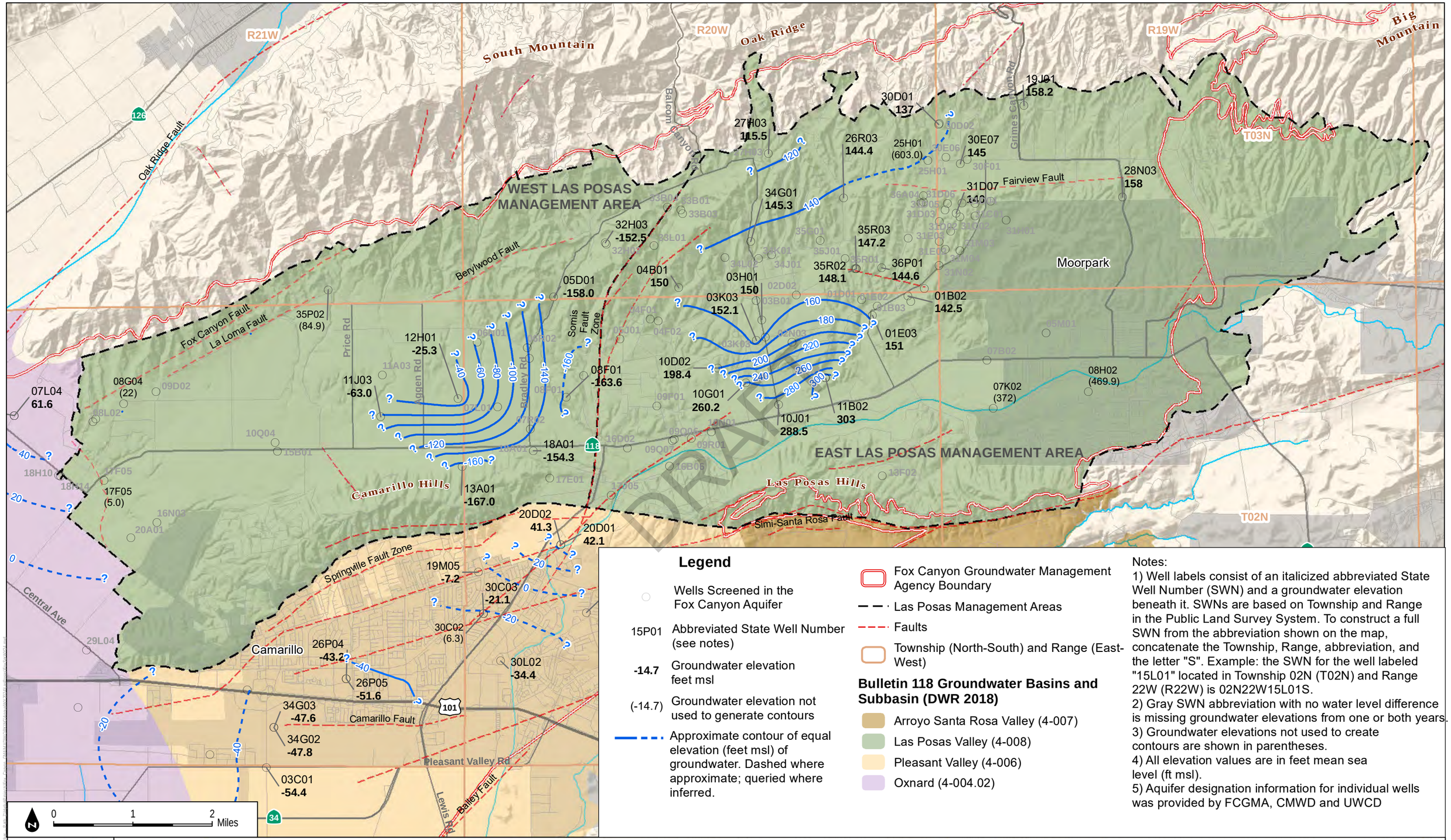

Legend

- Wells Screened in the Fox Canyon Aquifer
- 15P01 — Abbreviated State Well Number (see notes)
- -14.7 — Groundwater elevation feet msl
- (-14.7) — Groundwater elevation not used to generate contours
- Approximate contour of equal elevation (feet msl) of groundwater. Dashed where approximate; queried where inferred.
- Fox Canyon Groundwater Management Agency Boundary
- Las Posas Management Areas
- Faults
- Township (North-South) and Range (East-West)

Bulletin 118 Groundwater Basins and Subbasin (DWR 2018)

- Arroyo Santa Rosa Valley (4-007)
- Las Posas Valley (4-008)
- Pleasant Valley (4-006)
- Oxnard (4-004.02)

Notes:
1) Well labels consist of an italicized abbreviated State Well Number (SWN) and a groundwater elevation beneath it. SWNs are based on Township and Range in the Public Land Survey System. To construct a full SWN from the abbreviation shown on the map, concatenate the Township, Range, abbreviation, and the letter "S". Example: the SWN for the well labeled "15L01" located in Township 02N (T02N) and Range 22W (R22W) is 02N22W15L01S.
2) Gray SWN abbreviation with no water level difference is missing groundwater elevations from one or both years.
3) Groundwater elevations not used to create contours are shown in parentheses.
4) All elevation values are in feet mean sea level (ft msl).
5) Aquifer designation information for individual wells was provided by FCGMA, CMWD and UWCD

SOURCE: DWR; Ventura County; UWCD; CMWD

FIGURE 2-8

Groundwater Elevation Contours in the Fox Canyon Aquifer, March 1 to March 31, 2024

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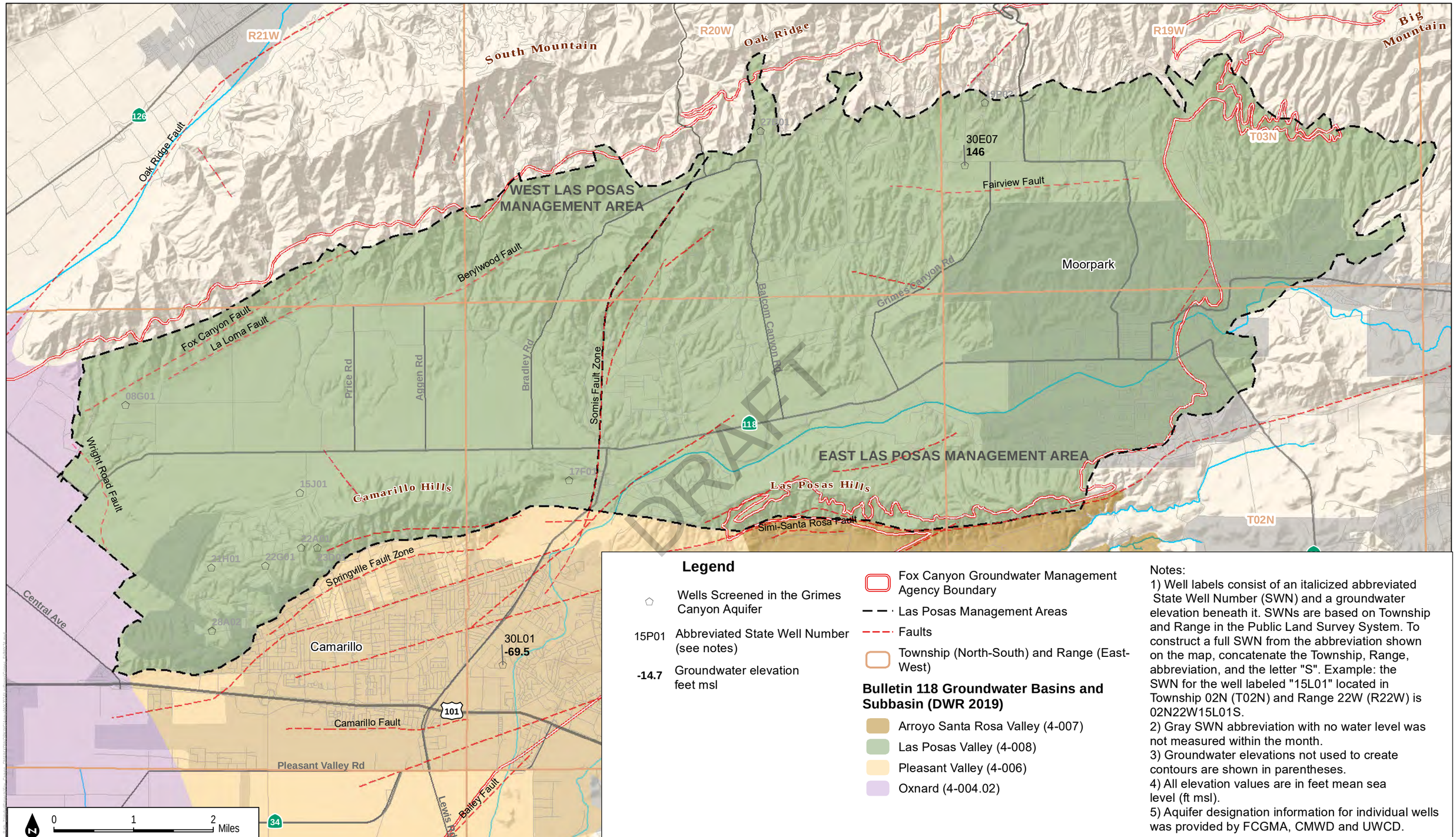

Legend

- Wells Screened in the Grimes Canyon Aquifer
- 15P01 — Abbreviated State Well Number (see notes)
- -14.7 — Groundwater elevation feet msl
- Fox Canyon Groundwater Management Agency Boundary
- Las Posas Management Areas
- Faults
- Township (North-South) and Range (East-West)

Bulletin 118 Groundwater Basins and Subbasin (DWR 2019)

- Arroyo Santa Rosa Valley (4-007)
- Las Posas Valley (4-008)
- Pleasant Valley (4-006)
- Oxnard (4-004.02)

Notes:
1) Well labels consist of an italicized abbreviated State Well Number (SWN) and a groundwater elevation beneath it. SWNs are based on Township and Range in the Public Land Survey System. To construct a full SWN from the abbreviation shown on the map, concatenate the Township, Range, abbreviation, and the letter "S". Example: the SWN for the well labeled "15L01" located in Township 02N (T02N) and Range 22W (R22W) is 02N22W15L01S.
2) Gray SWN abbreviation with no water level was not measured within the month.
3) Groundwater elevations not used to create contours are shown in parentheses.
4) All elevation values are in feet mean sea level (ft msl).
5) Aquifer designation information for individual wells was provided by FCGMA, CMWD and UWCD.

SOURCE: DWR; Ventura County; UWCD; CMWD

FIGURE 2-9

Groundwater Elevation Contours in the Grimes Canyon Aquifer, October 1 to October 31, 2023

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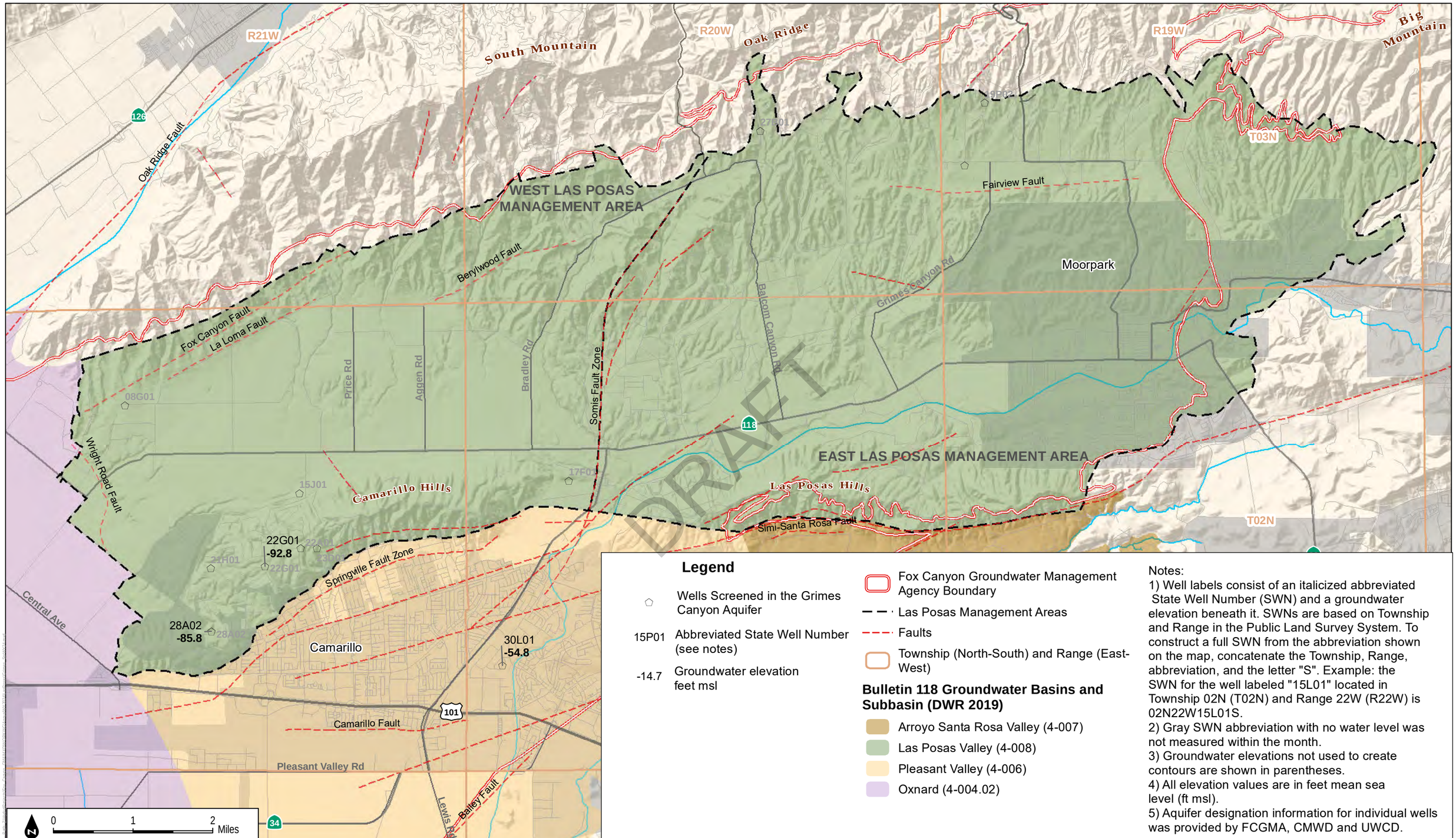

Legend

- Wells Screened in the Grimes Canyon Aquifer
- 15P01 — Abbreviated State Well Number (see notes)
- -14.7 — Groundwater elevation feet msl
- Fox Canyon Groundwater Management Agency Boundary
- Las Posas Management Areas
- Faults
- Township (North-South) and Range (East-West)

Bulletin 118 Groundwater Basins and Subbasin (DWR 2019)

- Arroyo Santa Rosa Valley (4-007)
- Las Posas Valley (4-008)
- Pleasant Valley (4-006)
- Oxnard (4-004.02)

Notes:
1) Well labels consist of an italicized abbreviated State Well Number (SWN) and a groundwater elevation beneath it. SWNs are based on Township and Range in the Public Land Survey System. To construct a full SWN from the abbreviation shown on the map, concatenate the Township, Range, abbreviation, and the letter "S". Example: the SWN for the well labeled "15L01" located in Township 02N (T02N) and Range 22W (R22W) is 02N22W15L01S.
2) Gray SWN abbreviation with no water level was not measured within the month.
3) Groundwater elevations not used to create contours are shown in parentheses.
4) All elevation values are in feet mean sea level (ft msl).
5) Aquifer designation information for individual wells was provided by FCGMA, CMWD and UWCD.

SOURCE: DWR; Ventura County; UWCD; CMWD

FIGURE 2-10

Groundwater Elevation Contours in the Grimes Canyon Aquifer, March 1 to March 31, 2024

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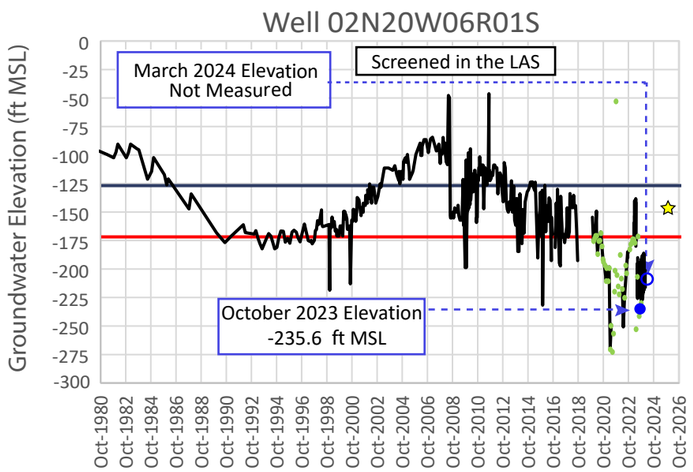

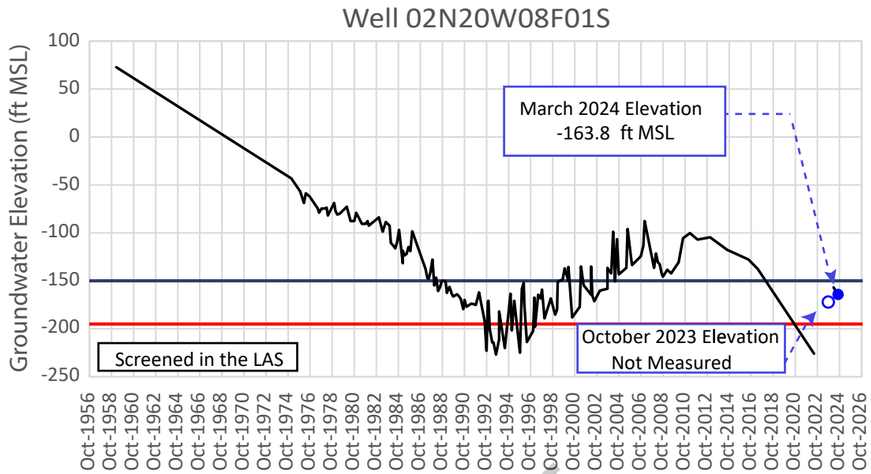

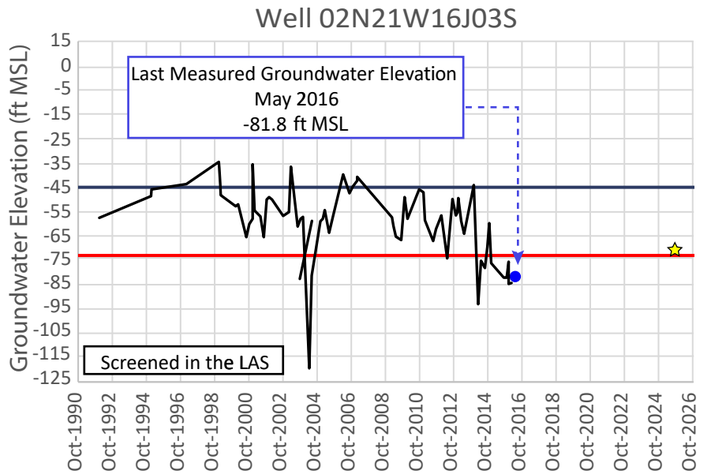

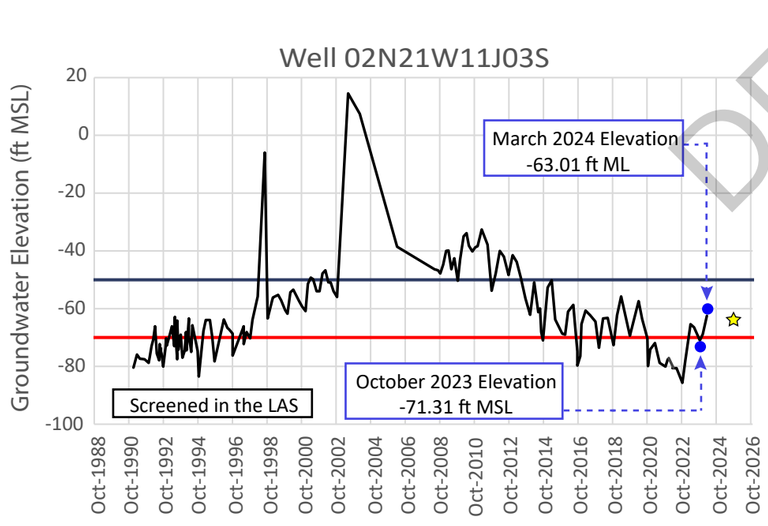

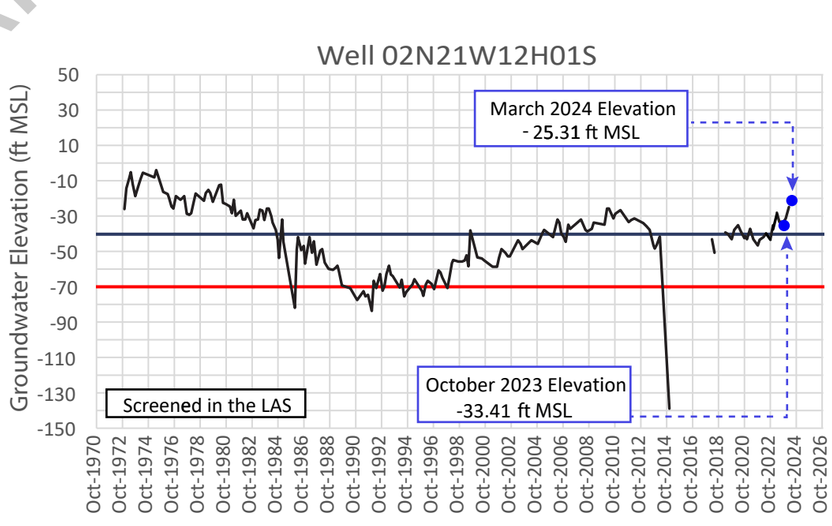

Groundwater Elevation — Minimum Threshold — Measurable Objective — ☆ 2025 Interim Milestone for Average Climate Conditions

○ Measurement not collected between October 2 and October 29, 2023 or March 2 and March 29, 2024

• VCWWD Manual WLE Measurements

Note: 2025 Interim milestone groundwater elevations are not established for wells where 2015 groundwater elevations were higher than the established minimum thresholds

SOURCE: UWCD, VCWPD

FIGURE 2-11

Groundwater Elevation Hydrographs for Representative Monitoring Points in the West Las Posas Management Area

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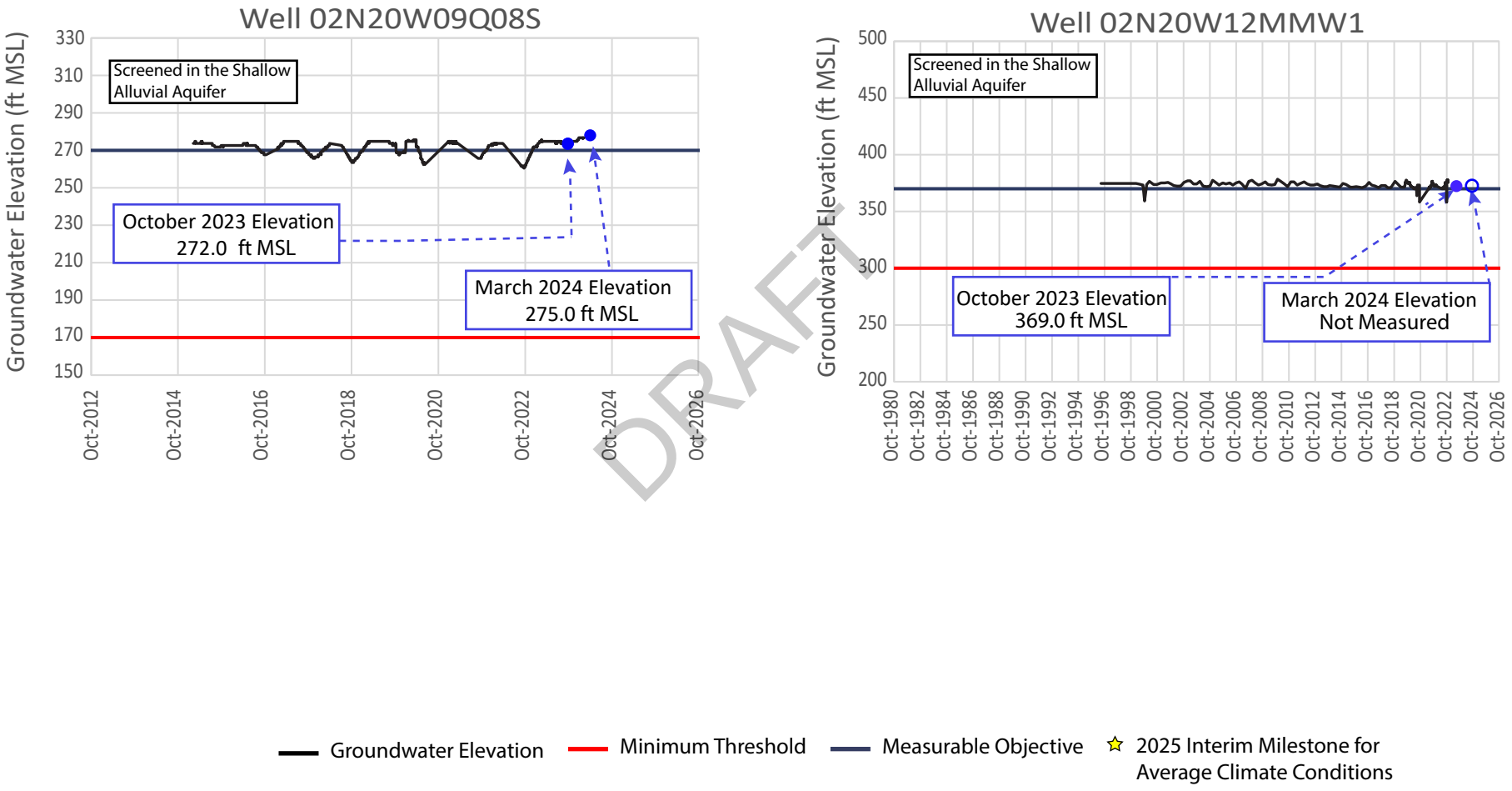

Note: 2025 Interim milestone groundwater elevations are not established for wells where 2015 groundwater elevations were higher than the established minimum thresholds

SOURCE: UWCD, VCWPD

FIGURE 2-12a

Groundwater Elevation Hydrographs for ELPMA Representative Monitoring Points Screened in the Shallow Alluvial Aquifer

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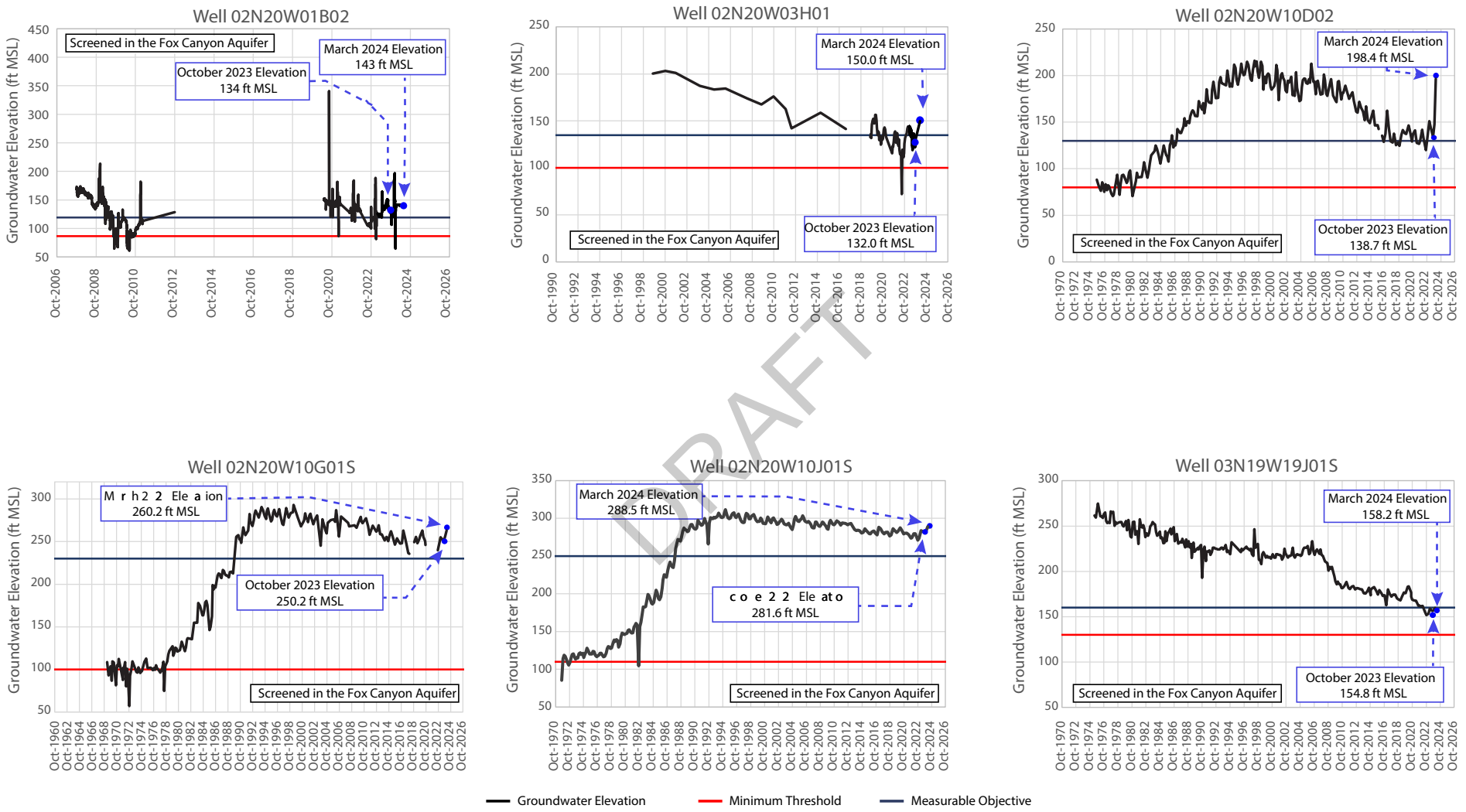

Note: 2025 Interim milestone groundwater elevations are not established for wells where 2015 groundwater elevations were higher than the established minimum thresholds

SOURCE: UWCD, VCWPD

FIGURE 2-12b

Groundwater Elevation Hydrographs for ELPMA Representative Monitoring Points Screened in the FCA

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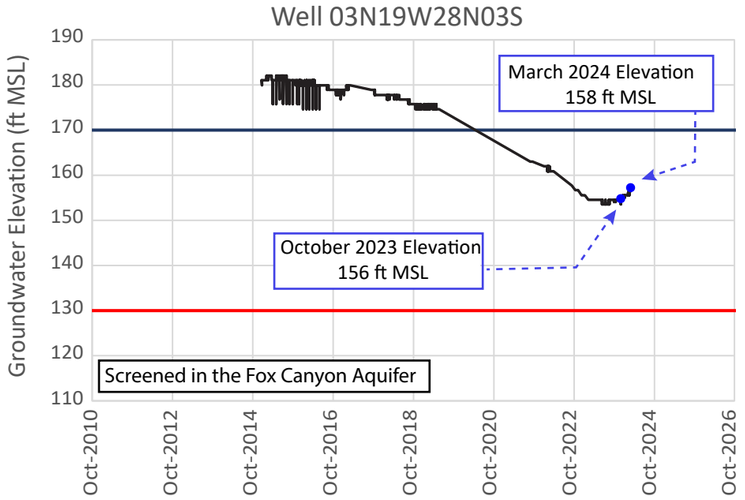

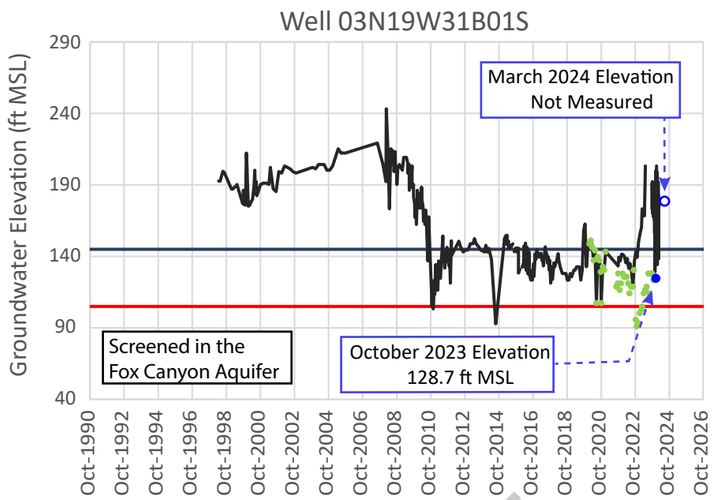

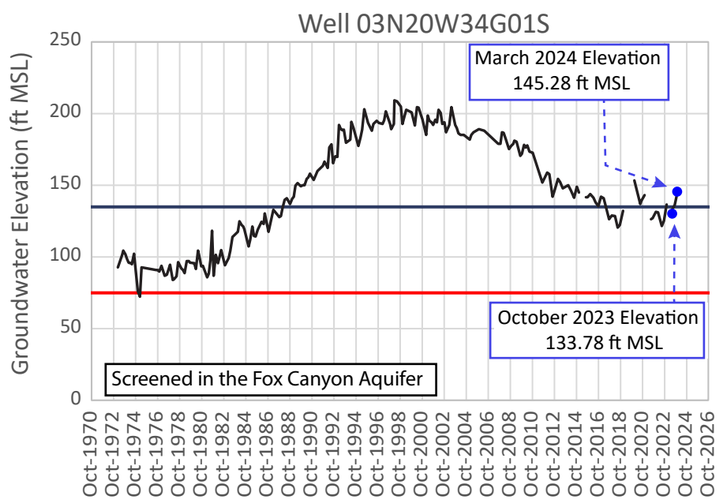

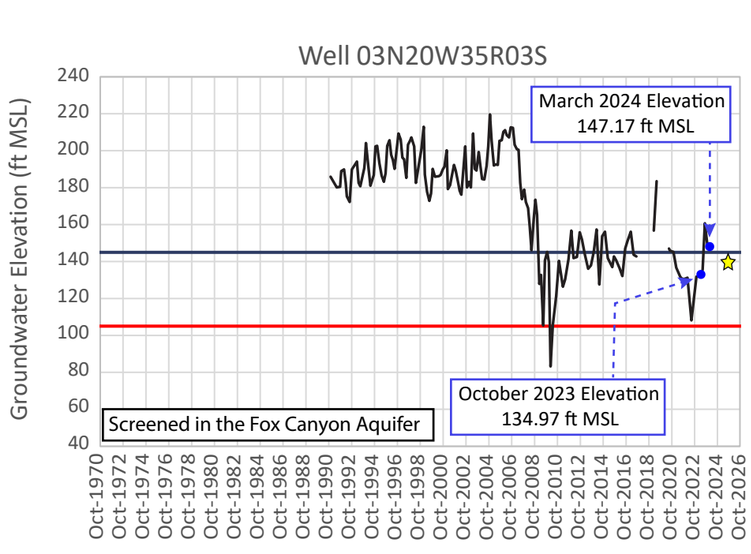

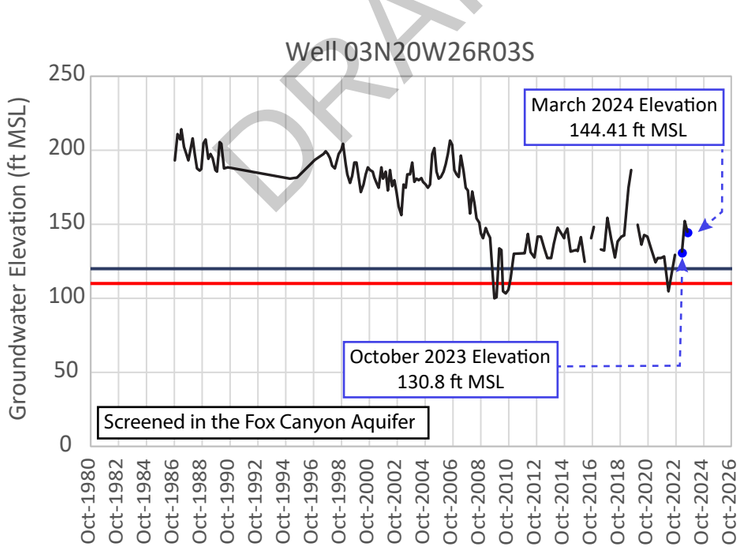

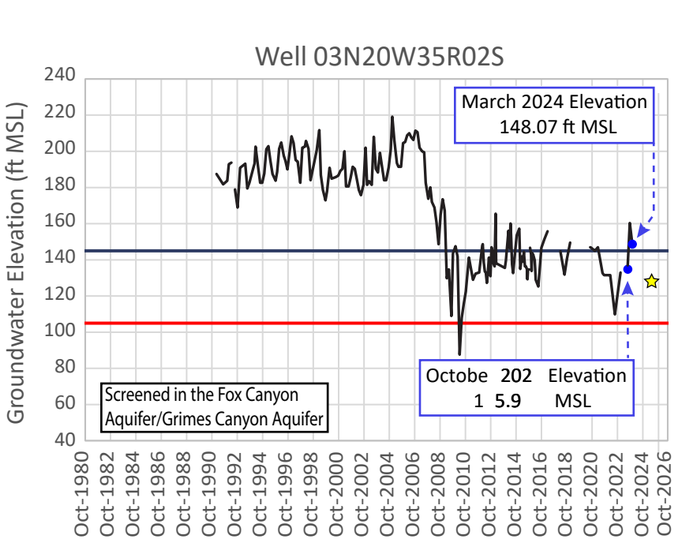

Groundwater Elevation | Minimum Threshold | Measurable Objective | 2025 Interim Milestone for Average Climate Conditions | VCWWD Manual WLE Measurements

Note: 2025 Interim milestone groundwater elevations are not established for wells where 2015 groundwater elevations were higher than the established minimum thresholds

SOURCE: UWCD, VCWPD

FIGURE 2-12c
Groundwater Elevation Hydrographs for Representative Monitoring Points Screened in the East Las Posas Management Area
Las Posas Valley Basin Groundwater Sustainability Plan 2025 Annual Report

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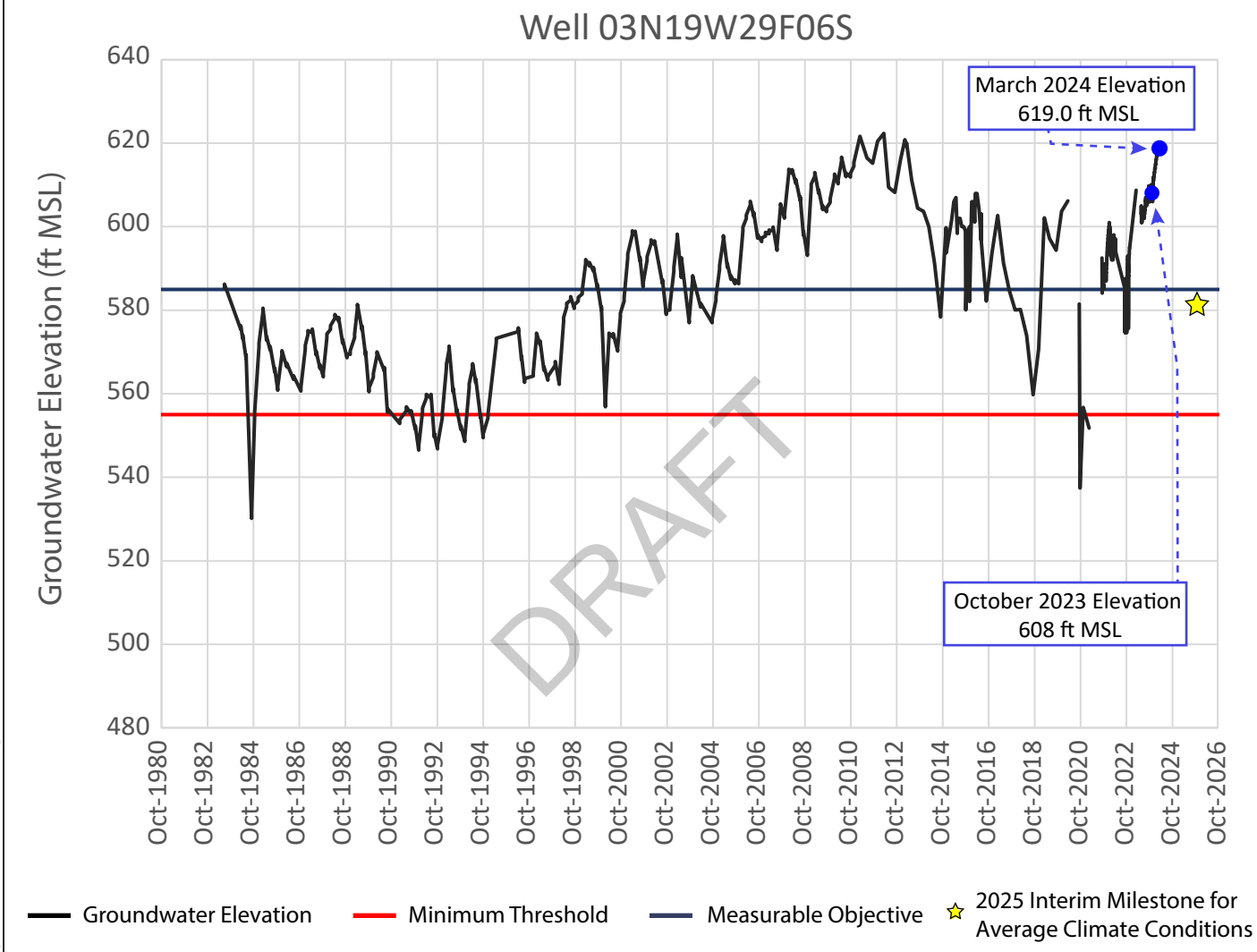

SOURCE: UWCD, VCWPD

FIGURE 2-13
Groundwater Elevation Hydrograph for the Representative Monitoring Points Screened in the Epworth Gravels Aquifer

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Figure 2-14 Groundwater Production in the Las Posas Valley Basin in Water Year 2024

AS OF JANUARY 15, 2025, EXTRACTION REPORTING HAS NOT BEEN FINALIZED. FIGURE 2-14 WILL BE DEVELOPED UPON RECEIPT OF WATER YEAR 2024 EXTRACTION DATA

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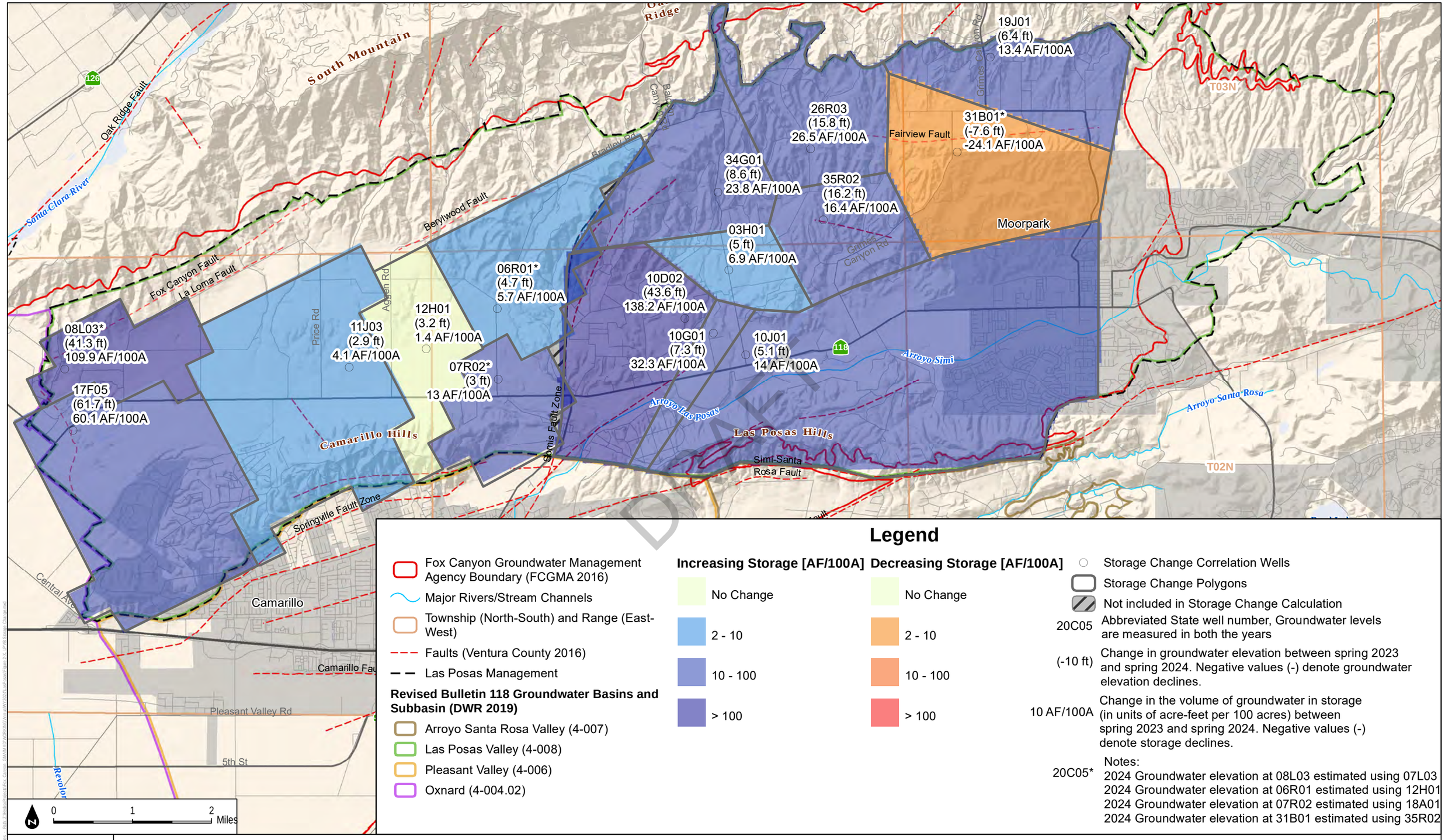

Legend

- Fox Canyon Groundwater Management Agency Boundary (FCGMA 2016)
- Major Rivers/Stream Channels
- Township (North-South) and Range (East-West)
- Faults (Ventura County 2016)
- Las Posas Management

Revised Bulletin 118 Groundwater Basins and Subbasin (DWR 2019)

- Arroyo Santa Rosa Valley (4-007)
- Las Posas Valley (4-008)
- Pleasant Valley (4-006)
- Oxnard (4-004.02)

Increasing Storage [AF/100A]	Decreasing Storage [AF/100A]
No Change	No Change
2 - 10	2 - 10
10 - 100	10 - 100
> 100	> 100

- Storage Change Correlation Wells
- Storage Change Polygons
- Not included in Storage Change Calculation

20C05 — Abbreviated State well number, Groundwater levels are measured in both the years

(-10 ft) — Change in groundwater elevation between spring 2023 and spring 2024. Negative values (-) denote groundwater elevation declines.

10 AF/100A — Change in the volume of groundwater in storage (in units of acre-feet per 100 acres) between spring 2023 and spring 2024. Negative values (-) denote storage declines.

20C05* — Notes:
2024 Groundwater elevation at 08L03 estimated using 07L03
2024 Groundwater elevation at 06R01 estimated using 12H01
2024 Groundwater elevation at 07R02 estimated using 18A01
2024 Groundwater elevation at 31B01 estimated using 35R02

SOURCE: DWR, FCGMA, VCWPD, CMWD, UWCD

FIGURE 2-15

Change in Storage in the Fox Canyon Aquifer: Spring 2023 to Spring 2024

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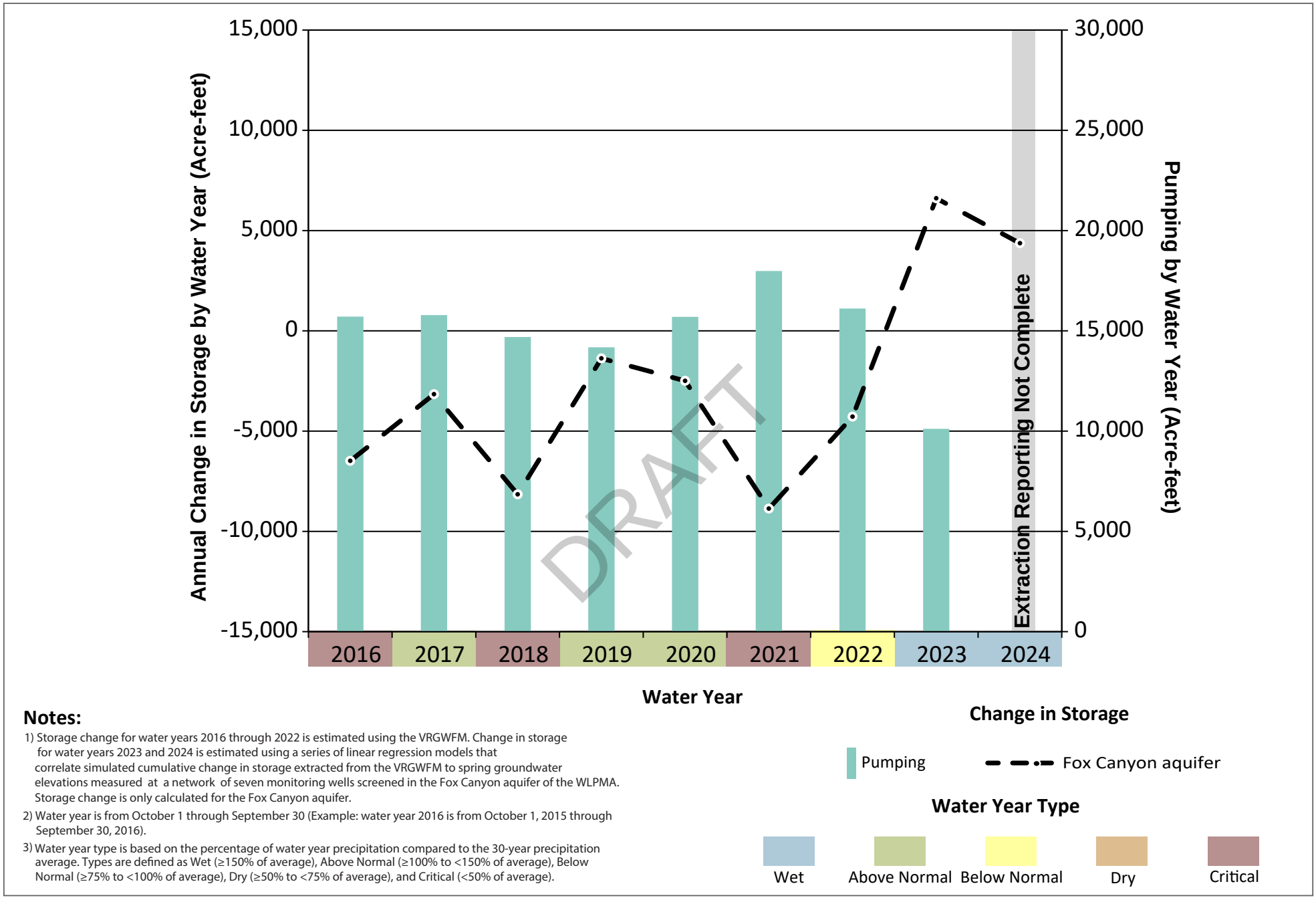

FIGURE 2-16

Water Year Type, Groundwater Use, and Annual Change in Storage in the West Las Posas Management Area

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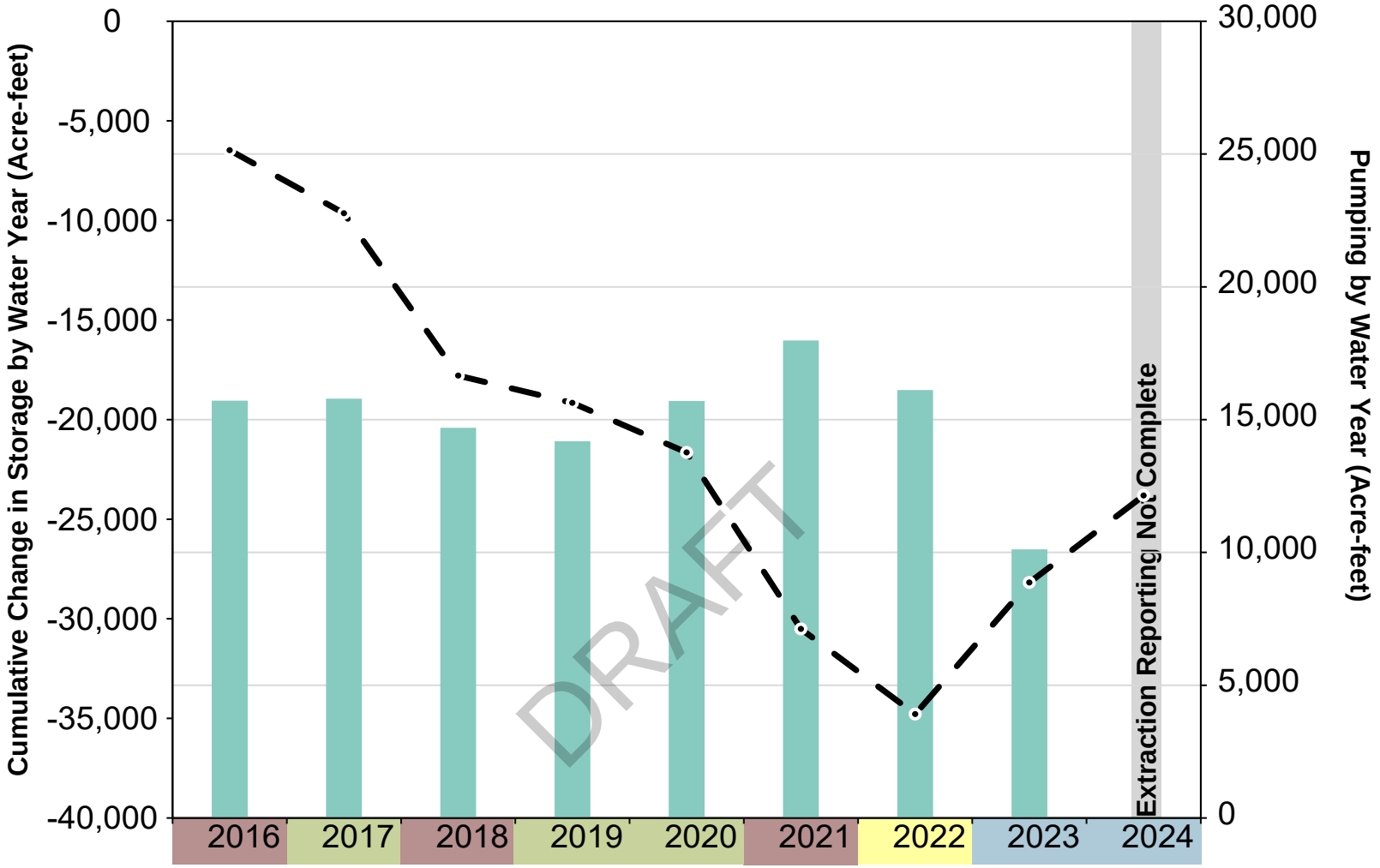

Notes:

1) Storage change for water years 2016 through 2022 is estimated using the VRGWFM. Change in storage for water years 2023 and 2024 is estimated using a series of linear regression models that correlate simulated cumulative change in storage extracted from the VRGWFM to spring groundwater elevations measured at a network of seven monitoring wells screened in the Fox Canyon aquifer of the WLPMA. Storage change is only calculated for the Fox Canyon aquifer.
2) Water year is from October 1 through September 30 (Example: water year 2016 is from October 1, 2015 through September 30, 2016).
3) Water year type is based on the percentage of water year precipitation compared to the 30-year precipitation average. Types are defined as Wet (≥150% of average), Above Normal (≥100% to <150% of average), Below Normal (≥75% to <100% of average), Dry (≥50% to <75% of average), and Critical (<50% of average).

FIGURE 2-17

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Water Year Type, Groundwater Use, and Cumulative Change in Storage in the West Las Posas Management Area

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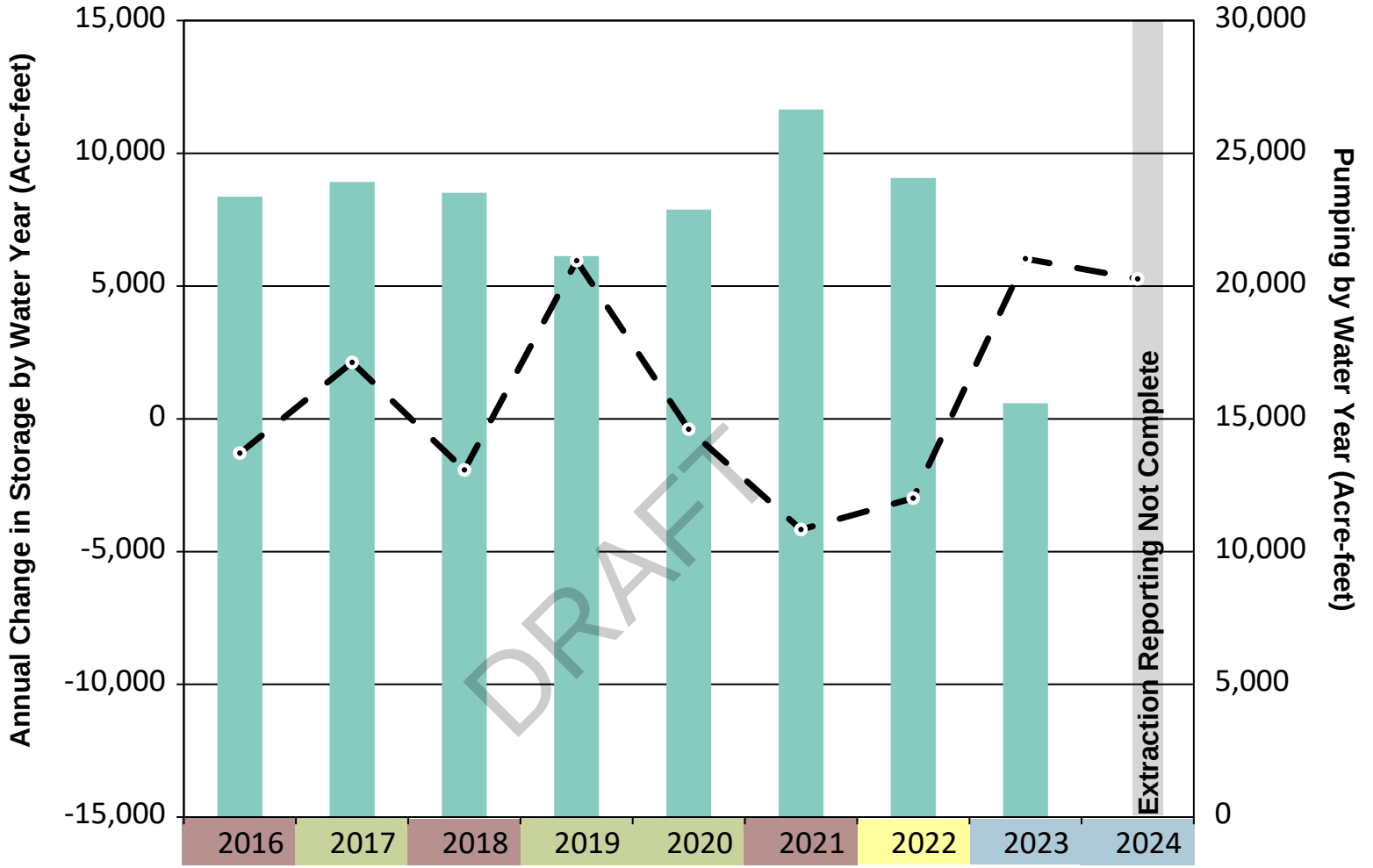

Notes:

1) Storage change for water years 2016 through 2022 is estimated using the ELP model. Change in storage for water years 2023 and 2024 is estimated using a series of linear regression models that correlate simulated cumulative change in storage extracted from the ELP model to spring groundwater elevations measured at a network of nine monitoring wells screened in the Fox Canyon aquifer of the ELPMA. Storage change is only calculated for the Fox Canyon aquifer.
2) Water year is from October 1 through September 30 (Example: water year 2016 is from October 1, 2015 through September 30, 2016).
3) Water year type is based on the percentage of water year precipitation compared to the 30-year precipitation average. Types are defined as Wet (≥150% of average), Above Normal (≥100% to <150% of average), Below Normal (≥75% to <100% of average), Dry (≥50% to <75% of average), and Critical (<50% of average).

FIGURE 2-18

Water Year Type, Groundwater Use, and Annual Change in Storage in the East Las Posas Management Area

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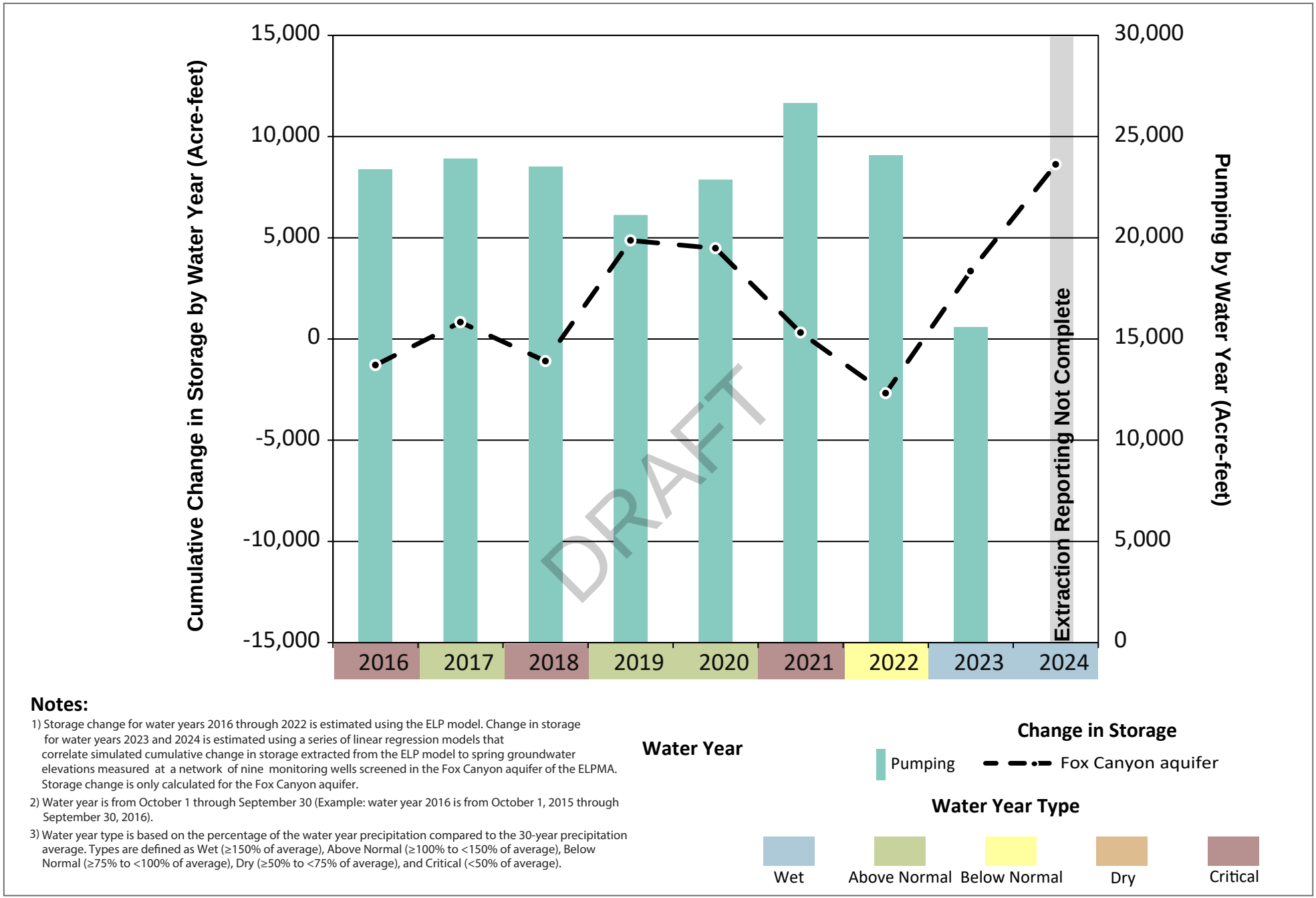

FIGURE 2-19

Water Year Type, Groundwater Use, and Cumulative Change in Storage in the East Las Posas Management Area

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Appendix A
Annual Allocation Accounting

ANNUAL ALLOCATION ACCOUNTING NOT AVAILABLE AT TIME OF REPORTING.

Appendix B
Watermaster Budget

DRAFT

Las Posas Valley Basin

Initial Watermaster Budget FY 2023-24[1]

Task	Reference[2]	Labor Hours Estimate[3]	Labor Cost Estimate[4]	Contract Cost Estimate[5]
Watermaster Administration				
Watermaster Meetings and Notice	Ex A 2.5	1,152	$ 216,576	
Review of Records	Ex A 2.4	192	$ 36,096	
Website	Ex A 2.4.1	192	$ 36,096	
Subtotal - Watermaster Administration		**1,536**	**$ 288,768**	**$ -**
Allocations & Record Keeping				
Annual Allocations & Allocation Schedule	4.2, 4.3	80	$ 15,040	
New Uses / Subscription Projects	4.6	384	$ 72,192	
Carryover	4.11	160	$ 30,080	
Transfers	4.12	384	$ 72,192	
Change of Point of Extraction	4.13	192	$ 36,096	
New or Replacement Well	4.14	192	$ 36,096	
Overuse	4.15	160	$ 30,080	
Extraction Monitoring and Reporting	Ex A, Article V	768	$ 144,384	
Subtotal - Allocations & Record Keeping		**2,320**	**$ 436,160**	**$ -**
Basin Management				
GSP Update (5-year evaluation)[6]	4.9.1	220	$ 41,360	$ 220,000
2025 Basin Optimization Yield Study[6]	4.10	220	$ 41,360	$ 122,000
Annual Report[6]	5.2.3, Ex A 2.7.10	120	$ 22,560	$ 53,990
Initial Basin Optimization Plan[6]	5.3	180	$ 33,840	$ 78,000
Subtotal - Basin Management		**740**	**$ 139,120**	**$ 473,990**
Committee Coordination and Consultations				
Policy Advisory Committee	6.1, Ex A Aticle III	288	$ 54,144	
Technical Advisory Committee[6]	6.11, Ex A Atricle IV	288	$ 54,144	$ 86,400
TAC Member Cost[7]				$ 259,200
Subtotal - Committee Coordination and Consultations		**576**	**$ 108,288**	**$ 345,600**

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Las Posas Valley Basin

Initial Watermaster Budget FY 2023-24[1]

Task	Reference[2]	Labor Hours Estimate[3]	Labor Cost Estimate[4]	Contract Cost Estimate[5]
Budget and Assessments				
Watermaster Budget	7.5, Ex A 2.7.6	120	$ 22,560	
Basin Assessments	7.1-7.3, 7.6, Ex A 2.8	576	$ 108,288	
Processing Fees	7.4	192	$ 36,096	
Audits	7.7	180	$ 33,840	$ 20,000
Subtotal - Budget and Assessments		**1,068**	**$ 200,784**	**$ 20,000**
Calleguas Aquifer Storage & Recovery Project				
Calleguas ASR Project Operations Study	8.4	384	$ 72,192	
Subtotal - Calleguas Aquifer Storage & Recovery Project		**384**	**$ 72,192**	**$ -**
Legal Services[8]				
Advisory		768	$ 198,912	
Judicial Review	9.2	600	$ 276,000	
Subtotal - Legal Services		**1,368**	**$ 474,912**	**$ -**
	TOTALS:	**7,992**	**$ 1,720,224**	**$ 839,590**
			Grand Total:	**$ 2,559,814**
			Total Annual Allocation (AF):	**40,000**
			Initial Basin Assessment per AF:	**$ 64.00**

Footnotes

1 The Initial FY 2023-24 Budget is for estimated Watermaster administration expenses. It is anticipated that the Basin Assessment may need to be adjusted with addition of Basin Optimication Projects costs following Committee Consultation. Additionally presumes that FCGMA pumping fees may need to be adjusted for LPV operators.

2 Reference to LPV Adjudication Judgment section, "Ex A" is Exhibit A of the Judgment.

3 Estimated annual hours for Ventura County staff.

4 Labor cost estimate based on Ventura County Public Works Agency providing LPV Watermaster staff at a blended rate.

5 Contract cost estimate for outside services through the current water year ending Sept. 30, 2024.

6 Contract cost estimate for Dudek for assissting with Response Reports. Assumes two meetings per month.

7 Contract cost estimate for three TAC members including preparation of Recommendation Reports. Assumes two meetings per month.

8 Legal Services labor costs based on Ventura County Counsel providing LPV Watermaster legal services; Judicial Review includes outside counsel costs.

Resolution No. 2024 – 04
of the
Fox Canyon Groundwater Management Agency

A RESOLUTION REFLECTING THE AGENCY BOARD OF DIRECTORS RESTATING THE AMOUNT AND NUMBER OF INSTALLMENTS FOR FISCAL YEAR 2023-2024 LAS POSAS VALLEY WATERMASTER BASIN ASSESSMENTS

WHEREAS, the Fox Canyon Groundwater Management Agency (FCGMA) is a groundwater management agency created by the California Legislature with the enactment of the Fox Canyon Groundwater Management Agency Act (Act) and is the exclusive groundwater sustainability agency for the Las Posas Valley Groundwater Basin (LPV Basin) under the Sustainable Groundwater Management Act (SGMA); and

WHEREAS, on July 10, 2023, the Santa Barbara Superior Court (Court) entered a final Judgment in *Las Posas Valley Water Rights Coalition, et al. v. Fox Canyon Groundwater Management Agency*, Santa Barbara Sup. Ct. Case No. VENC100509700 (Judgment), which, among other things, determined all groundwater rights in the LPV Basin and appoints FCGMA as the Watermaster to assist the Court implement the Judgment and manage the LPV Basin; and

WHEREAS, Section 7 of the Judgment requires the Watermaster to set, levy, and collect Basin Assessments from the Water Right Holders for management of the LPV Basin; and

WHEREAS, at its December 7, 2023, meeting, the FCGMA Board of Directors adopted a Watermaster Budget of $2,559,814 for Fiscal Year (FY) 2023-2024 and determined that an initial Basin Assessment of $64 per acre-foot of Annual Allocation is required to fund implementation of the Judgment and management of the Basin.

WHEREAS, since adopting the FY 2023-2024 Watermaster Budget and Basin Assessment, the Watermaster reconsidered its previous December 2023 Budget and Basin Assessment determinations, and now wishes to revise the amount and number of installments for FY 2023-24 Watermaster Basin Assessments.

NOW, THEREFORE, IT IS HEREBY PROCLAIMED AND ORDERED that the Fiscal Year 2023-2024 Basin Assessment for LPV Basin Water Right Holders is $32 and shall be collected by the Watermaster with a single installment and/or invoice.

On a motion by **Director Trembley** and seconded by **Director Borchard**, the foregoing resolution was passed and adopted on June 26, 2024, by the following vote:

AYES – **5**
NOES –
ABSTAINS –
ABSENT –

By: _____
Eugene F. West, Chair, Board of Directors
Fox Canyon Groundwater Management Agency

ATTEST: I hereby certify that the above is a true and correct copy of Resolution No. 2024-04.

By: _____
Elka Weber, Interim Clerk of the Board

Appendix C
Water Year 2023 Fiscal Report

FUND: O171 UNIT: 5796 LPV WATERMASTER	2023-24 ADOPTED BUDGET	ACCUMULATED OBJ	 PROG	 TOTAL	EXPENDITURES BY ACCOUNTING PERIOD AP 01 7/23	 AP 02 8/23	 AP 03 9/23	 AP 04 10/23	 AP 05 11/23	 AP 06 12/23	 AP 07 1/24	 AP 08 2/24	 AP 09 3/24	 AP 10 4/24	 AP 11 5/24	 AP 12 6/24	 AP 13 7/24
CASH BALANCE				-	-	-	-	-	-	-	-	-	-	295,450.04	849,106.92	910,625.33	1,063,816.77
REVENUE:																	
INTEREST EARNINGS		8911	-	9,845.86									-	-		97.22	9,748.64
BASIN ASSESSMENT FEE		9790	P6020670	1,259,607.38									308,142.40	575,704.32	104,795.17	195,154.24	75,811.25
BASIN ASSESSMENT INTEREST		9790	P6020671	20,025.83									-	-	1,248.48	18,777.35	
TOTAL REVENUE				1,289,479.07	-	-	-	-	-	-	-	-	308,142.40	575,704.32	106,043.65	214,028.81	85,559.89
TOTAL FUNDS AVAILABLE					-	-	-	-	-	-	-	-	308,142.40	871,154.36	955,150.57	1,124,654.14	1,149,376.66
EXPENDITURES:																	
SUPPORT:																	
PUBLIC WORKS ISF CHARGES - LPV WATERMASTER ADMINISTRATION	288,768	2205	P6020660	66,034.35									9,799.43	18,808.16	20,231.65	17,131.11	64.00
PUBLIC WORKS ISF CHARGES - LPV ALLOCATIONS & RECORD KEEPING	436,160	2205	P6020661	3,071.70									575.96	-	623.93	1,871.81	
PUBLIC WORKS ISF CHARGES - LPV BASIN MANAGEMENT	613,110	2205	P6020662	3,936.87									-	1,097.51		2,839.36	
PUBLIC WORKS ISF CHARGES - LPV COMMITTEE COORDINATION AND CONSULTA	453,888	2205	P6020663	3,622.07									934.34	1,631.83	1,055.90		
PUBLIC WORKS ISF CHARGES - LPV BUDGET & ASSESSMENTS	220,784	2205	P6020664	4,768.26									383.95	-	3,694.87	689.44	
PUBLIC WORKS ISF CHARGES - LPV SERVICE & SUPPORT	-	2205	P6020667	3,338.46									998.68	509.94	853.64	976.20	
LPV CALLEGUAS ASR PROJECT OPERATIONS STUDY	72,192		P6020665	-									-	-			
LEGAL:																	
LPV LEGAL SERVICES - COUNTY COUNSEL	474,912	2185	P6020666	59,958.50									-	-	18,065.25	25,058.25	16,835.00
CONTRACTS:																	
CONTRACT SERVICE - RGS AUTHORITY		2199	P6020660	17,244.10												12,271.20	4,972.90
TOTAL EXPENDITURES	2,559,814			161,974.31	-	-	-	-	-	-	-	-	12,692.36	22,047.44	44,525.24	60,837.37	21,871.90
CONTINGENCY																	
ENDING CASH BALANCE				**1,127,504.76**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**295,450.04**	**849,106.92**	**910,625.33**	**1,063,816.77**	**1,127,504.76**

Appendix D
Audit of Assessments and Expenditures

AUDIT OF ASSESSMENTS AND EXPENDITURES NOT AVAILABLE AT TIME OF REPORTING.

Appendix E
Updated Groundwater Allocation Schedule

Exhibit C: Groundwater Allocation Schedule

Agricultural Allocations

WMID	Landowner	Ranch / Property Name	Parcels	Wells	Mutual Water Company Shareholder	Mutual Water Company Type	Allocation Basis (AF)	Base Agricultural Allocation (AF)	Supplemental Agricultural Allocation (AF)
1001	49 Acres Scholle Ranch LP		110-0-091-010 110-0-091-020 110-0-091-030 110-0-120-080 110-0-120-160 110-0-120-170	02N21W10Q03 02N21W10Q04	Yes	Hybrid	368.02	248.46	119.56
3201	8201 Bixby Road LLC		108-0-180-045 108-0-180-085		Yes	Exclusive	55.12	36.44	18.68
3301	Aceves, Jose L. and Donald M. Herman (Plants Plus)		110-0-071-040		Yes	Exclusive	16.35	10.11	6.24
1002	Aggen Associates, LLC		110-0-141-020 110-0-142-010	02N21W12G01	No	N/A	164.71	158.61	6.10
1003	Aggen Partners, LP		110-0-142-075 110-0-142-140	02N21W12H01 02N21W12H02	Yes	Hybrid	219.09	148.03	71.05
4209	Agoure Ranch, LLC		110-0-200-215		Yes	Exclusive	64.00	64.00	0.00
3114	Alan Clark Goddard and Deborah Lynne Goddard		163-0-020-270		Yes	Exclusive	0.12	0.08	0.04
1194	Alfonso Gonzalez, Trustee of the Alfonso Gonzalez 2013 Separate Property Trust	Rancho San Juan	503-0-060-285	02N20W01J01	No	N/A	24.91	24.91	0.00
1179	Ali Seyedi Revocable Trust dated 12/30/2019, Ali Seyedi, Trustee		110-0-420-065		Yes	Exclusive	38.71	20.14	18.57
4201	AMS Craig LLC, a Delaware limited liability company		110-0-210-120		Yes	Hybrid	23.11	18.64	4.46
4228	AMS Craig LLC, a Delaware limited liability company		110-0-200-255		Yes	Exclusive	22.79	21.56	1.23
1034	Ann Cooluris, Trustee of the Ann C. Cooluris Trust, et al.		110-0-150-085		Yes	Exclusive	164.41	112.49	51.92
1006	Apricot Lane Farm Holdings, LLC	Main - Broadway	503-0-010-025 503-0-010-030 503-0-010-040 503-0-010-335 503-0-010-395 503-0-020-125 503-0-020-260 503-0-020-425	03N20W25J04 03N20W25R04	No	N/A	295.51	137.69	157.82
1007	Apricot Lane Farm Holdings, LLC	Stockton	108-0-170-025 108-0-170-035	03N20W24P01	No	N/A	67.72	57.57	10.15

Exhibit C: Groundwater Allocation Schedule

Agricultural Allocations

WMID	Landowner	Ranch / Property Name	Parcels	Wells	Mutual Water Company Shareholder	Mutual Water Company Type	Allocation Basis (AF)	Base Agricultural Allocation (AF)	Supplemental Agricultural Allocation (AF)
1064	April First Trust dated 01/15/2001, John M. Grether and Elizabeth B. Grether, Trustees	Russell	110-0-092-260		Yes	Exclusive	56.22	56.22	0.00
1065	April First Trust dated 01/15/2001, John M. Grether and Elizabeth B. Grether, Trustees	Rita	110-0-133-085	02N21W01L01 02N21W11A03 03N21W36Q01	No	N/A	29.60	16.85	12.75
1066	April First Trust dated 01/15/2001, John M. Grether and Elizabeth B. Grether, Trustees	Selia	110-0-141-125		Yes	Exclusive	53.46	49.44	4.02
1091	Audelio Martinez	Sand Canyon - North	110-0-200-220		Yes	Exclusive	23.80	23.80	0.00
1092	Audelio Martinez	Sand Canyon - South	110-0-200-335	02N20W09C01	No	N/A	29.43	22.94	6.49
1085	Audelio Martinez and Renato Martinez	Escondido Ranch	110-0-040-395 110-0-040-405	03N20W33F01	No	N/A	245.52	122.76	122.76
1086	Audelio Martinez and Renato Martinez	GTO Ranch	110-0-150-075	02N20W07L01	Yes	Hybrid	100.19	59.21	40.99
1087	Audelio Martinez and Renato Martinez	Inoberry Ranch	110-0-180-360 110-0-180-370	02N20W09C01	Yes	Hybrid	400.33	216.85	183.49
1088	Audelio Martinez and Renato Martinez	Luzmar Ranch	110-0-160-245		Yes	Exclusive	50.39	36.71	13.68
1089	Audelio Martinez and Renato Martinez	Palace Ranch	110-0-170-255		Yes	Exclusive	74.56	34.75	39.81
1090	Audelio Martinez and Renato Martinez	Patricia Ranch	110-0-120-055		Yes	Exclusive	91.72	54.44	37.27
1093	Audelio Martinez and Renato Martinez	Santa Rosa Ranch	110-0-160-100		Yes	Exclusive	146.82	86.76	60.06
1178	Audelio Martinez and Renato Martinez	Somis Ranch	161-0-060-015		Yes	Exclusive	73.78	40.82	32.97
3309	Avalos, Heliodoro and Yadira Trustees (Laguna - Posita Ranch)		110-0-072-050		Yes	Exclusive	28.17	11.81	16.36
3307	Balcom Canyon Ranch, LLC c/o Matthew Lamishaw		110-0-210-100		Yes	Exclusive	42.19	29.87	12.32
3335	Baron, Richard A. & Sandra		503-0-040-195 503-0-040-215		Yes	Exclusive	38.50	28.62	9.88
3323	Becerra Roberto and Maria Trustees, pledged to CCFLB		503-0-040-225		Yes	Exclusive	48.96	24.27	24.69
1010	Bell Ranch Investors, LLC		156-0-180-350 156-0-180-360 156-0-180-430	02N20W17F01 02N20W17L01	No	N/A	583.35	244.63	338.72
1105	Benchmark Partners Ag, LLC		503-0-020-245 503-0-030-275	03N20W36L01	No	N/A	43.60	25.08	18.52
3113	Benjamin and Leonila Vazquez		163-0-020-200		Yes	Exclusive	33.01	22.56	10.45

Exhibit C: Groundwater Allocation Schedule

Agricultural Allocations

WMID	Landowner	Ranch / Property Name	Parcels	Wells	Mutual Water Company Shareholder	Mutual Water Company Type	Allocation Basis (AF)	Base Agricultural Allocation (AF)	Supplemental Agricultural Allocation (AF)
4203	Benjamin C. Vasquez and Leonila C. Vasquez, Trustees of the Vazquez Trust dated July 7, 2021, as community property		110-0-150-040		Yes	Exclusive	28.55	15.29	13.26
4263	Benjamin Vasquez and Leonila C. Vasquez, husband and wife as joint tenants		110-0-220-040	02N20W10G01	Yes	Hybrid	104.35	66.68	37.67
1013	Berkshire Investments, LLC, a California limited liability company		503-0-050-225 503-0-050-245	02N20W01Q01 02N20W01Q02	No	N/A	81.00	47.86	33.13
3310	Berney, Charles and Carol		110-0-080-015 110-0-080-060		Yes	Exclusive	40.81	30.20	10.61
1014	Berylwood Ranch, LLC, a California limited liability company		110-0-020-090 110-0-020-100		Yes	Exclusive	235.38	107.92	127.46
3501	Biocca, Siro		109-0-032-120		Yes	Exclusive	41.07	41.07	0.00
3502	Bliss Trust		110-0-100-155		Yes	Exclusive	21.00	21.00	0.00
1022	Borchard, Patricia C. Trust, John Borchard Trustee		109-0-031-175		Yes	Exclusive	99.92	62.29	37.62
3601	Bought The Farm, LLC	Lot 01	503-0-071-035		Yes	Exclusive	30.40	12.75	17.65
1191	Brian A. Lee and Maria G. Lee as Trustees of the Lee Family Trust	Empty Saddle Ranch	503-0-020-150	03N20W36G02	No	N/A	36.65	21.80	14.84
1195	Brian A. Lee and Maria G. Lee as Trustees of the Lee Family Trust	Rancho Maria	503-0-020-360	03N20W36G02	No	N/A	25.43	23.45	1.99
1103	Brian L. Moore Revocable Trust dated 10/30/2009, Brian L. Moore, Trustee		110-0-420-075		Yes	Exclusive	33.84	33.84	0.00
1023	Broadway Road Moorpark, LLC, a Delaware limited liability company		502-0-020-030		Yes	Exclusive	149.97	62.89	87.08
3503	Brown, Nicholas		110-0-110-150		Yes	Exclusive	3.86	1.62	2.24
3705	Bruce Bennett and Patricia Conway Bennett, Trustees of the Bruce Bennett and Patricia Conway Bennett Trust established January 7, 2007		110-0-010-205		Yes	Exclusive	12.57	12.57	0.00
1026	Bruecker 2005 Revocable Family Trust, Kenneth A. and Juli A. Bruecker, Co-Trustees		503-0-060-225 503-0-060-235 503-0-060-255 503-0-060-325	02N20W01A01	No	N/A	87.15	68.42	18.73
1008	Bryce and Elaine Bannatyne Trust, Bryce Bannatyne, Trustee	Rancho Resplandor Sand Canyon	110-0-200-240	02N20W09B01	No	N/A	27.43	27.31	0.12

Exhibit C: Groundwater Allocation Schedule

Agricultural Allocations

WMID	Landowner	Ranch / Property Name	Parcels	Wells	Mutual Water Company Shareholder	Mutual Water Company Type	Allocation Basis (AF)	Base Agricultural Allocation (AF)	Supplemental Agricultural Allocation (AF)
1009	Bryce and Elaine Bannatyne Trust, Bryce Bannatyne, Trustee	Rancho Resplandor Moorpark	502-0-060-010	03N19W29L01	No	N/A	219.05	92.96	126.09
1027	Burdullis Ranches LLC		110-0-420-025		Yes	Exclusive	39.37	36.76	2.61
1028	Burdullis Ranches LLC		110-0-420-045		Yes	Exclusive	37.22	30.79	6.43
1161	CE + D Mabry Family LP	Mabry Ranch	503-0-020-165 503-0-020-410 503-0-030-290	03N20W25R03 03N20W36A04 03N20W36L01	No	N/A	89.62	51.25	38.37
1181	Charles and Mary Wehrheim, Co-Trustees of the Wehrheim Family Trust		503-0-050-365 503-0-050-390	02N20W02J02	No	N/A	79.91	47.61	32.30
1197	Charles Blanc		503-0-020-185	03N20W36G02	No	N/A	28.71	20.80	7.91
1109	Charles R. and Kathleen M. Northcross Family Trust dated 05/27/2000, Charles and Kathleen Northcross, Trustees		110-0-420-015		Yes	Exclusive	33.01	30.59	2.42
3804	Charles R. Knowles Jr. and Marie L. Knowles, Trustees, or their successors in trust of the Knowles Family Trust D.T.D. 3/9/93	Lot 4	110-0-230-305		Yes	Exclusive	30.06	21.88	8.17
3112	Chirag and Khushbu Dalsania		163-0-020-585		Yes	Exclusive	28.21	19.27	8.93
1134	Chris Marcussen		503-0-020-400	03N20W36L01	No	N/A	48.80	25.85	22.96
3802	Claude R. Goodman & Loraine S. Goodman, Trustees of The Claude R. Goodman and Loraine S. Goodman Family Trust, dated September 25, 2003	Lot 2	110-0-230-325		Yes	Exclusive	1.09	1.01	0.08
1110	Cohen Trust of 1990, dated 11/27/1990, and restated 08/05/2010, Marc S. Cohen and Lyn M. Cohen, Co-Trustees		110-0-010-215		Yes	Exclusive	14.87	8.80	6.07
1035	Culbert Farms LLC; Cristina Marie Kildee; Delcia Ann Giacalone; Jennifer Elizabeth Kildee; Richard D. Culbert; Michael Kenneth Kildee; Kevin Bertis Kildee	Culbert 60 Ranch	110-0-142-100		Yes	Exclusive	80.73	73.86	6.87
1036	D&D Coastal, LLC		108-0-180-065	03N20W27G06	Yes	Hybrid	32.79	14.19	18.60
1117	Davidson Family Trust dated 09/23/1992, Jerry Davidson, Trustee		503-0-020-225	03N20W36L01	No	N/A	42.40	24.52	17.87
1037	DeBoni Corporation		110-0-141-090	02N21W11H02	Yes	Hybrid	120.66	80.81	39.85
1038	DeBoni Corporation		110-0-092-160 110-0-093-010		Yes	Exclusive	116.22	105.01	11.21
1039	Dent Ranch, LP		500-0-210-220		Yes	Exclusive	23.49	10.09	13.41

Exhibit C: Groundwater Allocation Schedule

Agricultural Allocations

WMID	Landowner	Ranch / Property Name	Parcels	Wells	Mutual Water Company Shareholder	Mutual Water Company Type	Allocation Basis (AF)	Base Agricultural Allocation (AF)	Supplemental Agricultural Allocation (AF)
4237	DFK Corporation, a California Corporation		110-0-141-045 110-0-141-110		Yes	Exclusive	100.82	100.82	0.00
4233	Donal N. Ziemer and Ann L. Ziemer, Trustees of the Ziemer Family Trust established November 14, 1980		156-0-121-050		Yes	Exclusive	20.02	9.65	10.37
1151	Dorcas H. Thille, Trustee of the Dorcas H. Thille Trust		109-0-061-070 109-0-061-080 109-0-061-150		Yes	Exclusive	148.13	109.45	38.67
1050	Dusty Lane LLC		108-0-100-145	03N20W28P03	No	N/A	22.22	16.14	6.08
1051	Dusty Lane LLC		110-0-230-255	03N20W28P03 03N20W28Q01	Yes	Hybrid	25.47	18.50	6.97
4208	Ehud Ariav Enterprises, Inc.		110-0-170-565		Yes	Exclusive	22.00	22.00	0.00
1063	Elizabeth B. Grether Trust, Elizabeth B. Grether, Trustee		155-0-270-255		Yes	Exclusive	150.40	119.05	31.36
4220	Elizabeth Pajka		110-0-160-185 110-0-160-205		Yes	Exclusive	14.63	6.13	8.49
4257	Eppy Ranch, LLC		155-0-270-055		Yes	Exclusive	29.17	23.43	5.74
1046	Ernest Borchard Ranch Co., LLC, a California limited liability company	Thorpe Ranch	110-0-120-060		Yes	Exclusive	200.41	148.36	52.05
1054	Farmland Reserve, Inc.		503-0-060-115 503-0-060-155 503-0-060-180	02N20W01Q01 02N20W01Q02	No	N/A	299.50	132.46	167.04
3319	Foulkrod, Marc J. & Jamie Foulkrod Trustees		110-0-080-075		Yes	Exclusive	21.57	15.07	6.50
1122	Frank Russell Ranch LP		110-0-092-250 110-0-120-250		Yes	Exclusive	135.70	81.29	54.40
4210	Fred A Sharl, Ernest R Nichols, Arthur L Nichols, Vincent E Gisler		110-0-120-180		Yes	Exclusive	154.98	106.68	48.30
3615	Fremont HGS, LLC	Lot 15	503-0-072-215		Yes	Exclusive	61.95	27.05	34.90
3504	Friel Las Posas LLC		110-0-092-155		Yes	Exclusive	58.45	49.55	8.90
3342	Gatling, Richard E. or Bonnie L. Gatling		110-0-072-070		Yes	Exclusive	13.03	12.26	0.77
1139	Gayl Family 1992 Trust, Robert Gayl, Trustee	Gayl Ranch	503-0-020-340	03N20W25R03 03N20W36A04	No	N/A	29.51	26.22	3.30
4242	George Tash and Debra B. Tash, Trustees of the Community Trust created under the George Tash and Debra B. Tash Intervivos Trust Agreement dated Nov. 25, 1985, fully reinstated May 19, 1999		110-0-170-585		Yes	Exclusive	46.57	30.54	16.03

Exhibit C: Groundwater Allocation Schedule

Agricultural Allocations

WMID	Landowner	Ranch / Property Name	Parcels	Wells	Mutual Water Company Shareholder	Mutual Water Company Type	Allocation Basis (AF)	Base Agricultural Allocation (AF)	Supplemental Agricultural Allocation (AF)
3617	Geraldine P. Berns, Trustee of the Geraldine P. Berns Family Trust No. One Established April 17, 1987	Lot 17	503-0-072-035		Yes	Exclusive	64.88	27.21	37.67
3613	GFO, LLC	Lot 13	503-0-072-195 503-0-072-275		Yes	Exclusive	116.89	54.58	62.31
3620	GFO, LLC	Lot 20	503-0-072-235		Yes	Exclusive	119.18	51.74	67.44
1031	Glen and Kim T. Carmichael, Co-Trustees of the Glen and Kim T. Carmichael Joint Living Trust and Carmichael Farms Trust		107-0-130-195 107-0-130-205 107-0-130-255 110-0-100-025	03N21W34R01	Yes	Hybrid	193.46	148.93	44.53
3111	Glen R. Carmichael and Kimberly T. Carmichael, Trustees of the Glen Carmichael and Kimberly Carmichael Joint Living Trust		163-0-010-290		Yes	Exclusive	42.88	29.30	13.58
1190	Gordon and Luanne Hilton		503-0-020-330	03N20W36G02	No	N/A	36.88	21.52	15.37
1080	Graham Somis Ranch, LLC	McKee Ranch	110-0-142-085 110-0-142-095	02N20W07L01	Yes	Hybrid	200.28	144.64	55.63
1055	Green Fuse Botanicals, LLC		503-0-040-065		Yes	Exclusive	16.09	13.18	2.92
1030	Green Hills Ranch, LLC	Green Hills Ranch	109-0-031-065 109-0-031-095 109-0-031-125 109-0-031-155		Yes	Exclusive	338.16	213.40	124.76
3605	Guzman Investments and Loan Inc.	Lot 05	503-0-072-135		Yes	Exclusive	33.36	21.76	11.60
1058	Gwyn Goodman, Trustee for the Goodman Family Trust		110-0-071-245 110-0-071-255 110-0-072-030		Yes	Exclusive	54.57	29.56	25.01
1070	Hacobian, Edward/Kristine		110-0-230-215	03N20W28P04	Yes	Hybrid	25.00	20.50	4.50
1071	Hagel, Timothy et al	Meadows of Moorpark	108-0-161-115	03N20W26C01	Yes	Hybrid	8.82	8.82	0.00
3312	Hameed, Rashid & Salmeen		110-0-071-185		Yes	Exclusive	16.28	12.12	4.16
1072	Harris Endeavors, LLC		110-0-230-145	03N20W28P01 03N20W28Q02	No	N/A	31.63	16.60	15.03

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WMID	Landowner	Ranch / Property Name	Parcels	Wells	Mutual Water Company Shareholder	Mutual Water Company Type	Allocation Basis (AF)	Base Agricultural Allocation (AF)	Supplemental Agricultural Allocation (AF)
4211	Helen Elaine Cavaletto, Trustee of the Cavaletto Survivor's Trust dated December 29, 2013, 403 shares; Richard Cavaletto and Melanie Cavaletto, Trustees of the Cavaletto Trust dated December 29, 2014, 57 shares; Gregory C. Hanger and Christina M. Hanger, Trustees of the Hanger Trust dated March 19, 2009, 57 shares		110-0-120-035		Yes	Exclusive	93.15	64.09	29.06
1073	Higgins, Sunny May Trust et al	Snyder Ranch	110-0-150-020 161-0-030-030		Yes	Hybrid	216.71	102.41	114.30
4244	Highwood Farms LLC		110-0-352-020		Yes	Exclusive	32.57	20.37	12.20
1043	Isabella Rastegar Farms, LLC	Tara Ranch	107-0-120-060 107-0-120-215 107-0-120-225 107-0-130-145	02N21W04Q02	Yes	Hybrid	181.17	107.06	74.12
3321	Ivan and Jennifer Amodei Family Trust		110-0-210-270		Yes	Exclusive	45.64	33.45	12.19
1047	J. David Borchard and Michele A. Borchard, Co-Trustees of the J. David and Michele A. Borchard Family Trust dated September 25, 2014	DJB Ranch	110-0-160-020		Yes	Exclusive	108.56	54.78	53.79
1136	James A. Fitzgerald Trust No. II, Brian Fitzgerald, Trustee	Fitzgerald Ranch	503-0-020-135	03N20W25R03 03N20W36A04	No	N/A	29.83	17.08	12.75
1061	James A. Waters, III, Trustee for The J&H Waters Revocable Trust Dated July 18, 2008	Bard Ranch	503-0-020-370	03N20W36A03	No	N/A	35.00	20.10	14.90
1059	James A. Waters, III, Trustee for The J&H Waters Revocable Trust Dated July 18, 2008; James A. Waters, III, Trustee for The Andrew Exempt Trust Dated June 29, 2012	Balcom Canyon Ranch	108-0-100-025	03N20W28J01S	Yes	Hybrid	134.58	97.74	36.84
1060	James A. Waters, III, Trustee for The J&H Waters Revocable Trust Dated July 18, 2008; James A. Waters, III, Trustee for The Andrew Exempt Trust Dated June 29, 2012	Hawley Ranch	110-0-080-100		Yes	Exclusive	143.26	77.24	66.02
1053	James D. Engel, Trustee for the James D. Engel and Kay A. Engel Trust Dated April 15, 1998	Quail Hill Enterprises, Inc.	503-0-020-350	03N20W36A03	No	N/A	40.00	22.33	17.67
1160	James D. Hearn and Shira C. Hearn, husband and wife	Jacoca Ranch	503-0-020-200	03N20W25R03 03N20W36A04	No	N/A	24.73	24.73	0.00

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Agricultural Allocations

WMID	Landowner	Ranch / Property Name	Parcels	Wells	Mutual Water Company Shareholder	Mutual Water Company Type	Allocation Basis (AF)	Base Agricultural Allocation (AF)	Supplemental Agricultural Allocation (AF)
3901	James E. Pierce	Somis Nursery	110-0-420-115		Yes	Exclusive	16.71	7.01	9.70
4245	James E. Pierce and Janice Pierce, Trustees of the James E. Pierce and Janice Pierce Revocable Trust, established August 15, 2003		110-0-390-045		Yes	Exclusive	19.24	19.24	0.00
4264	James R. Thiessen, an unmarried man; James R. Thissen, Trustee of the James R. Thiessen Trust dated November 30, 2012		110-0-180-145 110-0-180-165		Yes	Exclusive	17.93	16.28	1.64
3333	Javier A. Rodriguez and Gabrielle R. Rodriguez, husband and wife as community property with right of survivorship		110-0-071-155		Yes	Exclusive	7.55	4.35	3.20
1075	Jefferson Farms, LP		108-0-110-330 108-0-180-135 108-0-180-145 108-0-180-155 110-0-430-035 110-0-430-045 110-0-430-055 110-0-430-065 110-0-430-075 110-0-430-085	03N20W27H04 03N20W27J01 03N20W34J01m2 03N20W35D01	No	N/A	663.37	285.26	378.10
3606	Jeffrey S. Yong & Margaret K. Yong	Lot 06	503-0-072-145		Yes	Exclusive	86.91	52.31	34.60
3110	Jesus Jr. and Maribel Aguilera, Trustees of Aguilera Family 2015 Revocable Trust dated February 11, 2015		163-0-020-210		Yes	Exclusive	43.74	29.89	13.85

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WMID	Landowner	Ranch / Property Name	Parcels	Wells	Mutual Water Company Shareholder	Mutual Water Company Type	Allocation Basis (AF)	Base Agricultural Allocation (AF)	Supplemental Agricultural Allocation (AF)
1081	JG Leavens LLC and Leavens Ranches LLC		500-0-150-115 500-0-150-135 500-0-150-145 502-0-010-105 502-0-010-115 502-0-030-040 502-0-031-095 502-0-031-105 502-0-032-045 502-0-040-025 502-0-040-075 502-0-040-085 502-0-040-095 502-0-040-105 502-0-040-205 502-0-050-025 502-0-050-035 502-0-050-045 502-0-050-055 502-0-050-075 502-0-060-035 502-0-060-045 502-0-070-030 502-0-070-075 502-0-070-085 502-0-070-105 502-0-070-115 502-0-070-125 502-0-070-155 502-0-070-165 502-0-080-015 502-0-080-025 502-0-080-055 502-0-080-075 502-0-080-085	03N19W29K04 03N19W29K06 03N19W29K07 03N19W29K08	No	N/A	1,877.76	787.45	1,090.31
1180	JJM Somis Ranch, LLC	JJM Somis	110-0-150-105		Yes	Exclusive	78.32	70.22	8.10
3206	John & Cynthia Schoustra		110-0-060-455		Yes	Hybrid	28.12	28.12	0.00
1044	John Moffatt Grether, Trustee of the GST Exempt Exemption Trust and the Survivors Administrative Trust under the Grether Family Trust	Home 13	109-0-042-080		Yes	Exclusive	15.39	15.39	0.00
1150	John Moffatt Grether, Trustee of the GST Exempt Exemption Trust and the Survivor's Administrative Trust under the Grether Family Trust, dated September 12, 1989	Roberto	110-0-091-040 110-0-120-230	02N21W10G03	Yes	Hybrid	85.69	73.51	12.19

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Agricultural Allocations

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1062	John Moffatt Grether, Trustee of the Helen B. Grether Trust, the GST Exempt Exemption Trust, and the Survivors Adminstrative Trust under the Grether Family Trust	Home Ranch	109-0-042-090		Yes	Exclusive	105.74	102.65	3.08
1097	John R. Milligan Trust dated December 11, 1998, et al.		504-0-021-260	02N19W07B02 02N19W07K01	No	N/A	344.67	144.54	200.13
1024	John S. Broome Trust dated June 1, 1967, John S. Broome, Jr., Trustee, et al.	Escabitas	109-0-050-135 109-0-050-205	02N21W17N03	No	N/A	214.57	149.58	64.99
1025	John S. Broome Trust dated June 1, 1967, John S. Broome, Jr., Trustee, et al.	Colina	110-0-200-065	02N20W09H01	Yes	Hybrid	83.37	41.39	41.98
1049	John W. Borchard Jr. and Suzanne Borchard Kelly, Co-Trustees of the the Patricia C. Borchard Testamentary Trust for the benefit of John W. Borchard, Jr.	Knittles Ranch	110-0-133-220 110-0-133-250		Yes	Exclusive	96.58	65.44	31.15
1011	John W. Borchard Ranches, Inc., a California corporation	Reiman Ranch	110-0-133-230 110-0-133-240		Yes	Exclusive	264.51	180.19	84.32
1012	John W. Borchard Ranches, Inc., a California corporation	Goodyear Ranch	110-0-133-200 110-0-150-115		Yes	Exclusive	67.49	45.98	21.52
1045	John W. Borchard, Jr and J. David Borchard, Co-Trustees of the Cecilia Borchard 1971 Trust for the benefit of John W. Borchard, Jr.	Perkins Ranch	110-0-120-010		Yes	Exclusive	169.52	85.37	84.15
1048	John W. Borchard, Jr. and J. David Borchard, Co-Trustees of John's Exempt Residuary Trust, under the John W. Borchard 1986 Trust	Hawkins Ranch	110-0-131-010		Yes	Exclusive	22.47	11.31	11.16
1019	John W. Borchard, Jr., Trustee of the John W. Borchard, Jr. Trust dated May 12, 1971	Baptiste Ranch	110-0-170-645		Yes	Exclusive	48.23	30.02	18.21
1132	John W. Borchard, Jr., Trustee of the John W. Borchard, Jr. Trust dated May 12, 1971	Mulinix Ranch	110-0-020-130 110-0-020-140		Yes	Exclusive	132.96	92.66	40.30
1133	John W. Borchard, Jr., Trustee of the John W. Borchard, Jr. Trust dated May 12, 1971	Ford Ranch	110-0-131-020		Yes	Exclusive	111.70	56.26	55.44
1032	John-Yon Chang		503-0-050-320	02N20W01M01	No	N/A	230.66	100.48	130.17
1068	Jose de Jesus and Maria de la Cruz Gutierrez, Joint Tenants		110-0-420-095		Yes	Exclusive	21.06	10.97	10.09
1069	Jose de Jesus and Maria de la Cruz Gutierrez, Joint Tenants		110-0-420-105		Yes	Exclusive	15.30	15.30	0.00
3614	Josep J. Bilic, Trustee of the Bilic Living Trust Dated April 10, 1984	Lot 14	503-0-072-205		Yes	Exclusive	59.49	29.25	30.24

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Agricultural Allocations

WMID	Landowner	Ranch / Property Name	Parcels	Wells	Mutual Water Company Shareholder	Mutual Water Company Type	Allocation Basis (AF)	Base Agricultural Allocation (AF)	Supplemental Agricultural Allocation (AF)
3107	Joseph W. and Lisa Sutter, Trustees of the Sutter Family Trust u/d/t dated October 27, 2007		163-0-020-250 163-0-020-280 163-0-020-290		Yes	Exclusive	12.17	8.32	3.85
1155	Joshua L. Waters, Trustee for the the Joshua Exempt Trust, et al.		500-0-210-085 500-0-210-095		Yes	Exclusive	87.33	46.31	41.02
1192	JRRE Horizon LLC	Rancho Vista Allegre	110-0-230-405	03N20W28J04	No	N/A	66.52	39.26	27.26
3334	Kapigian, John and Linda, pledged to Ames & Marjorie Borrell		110-0-071-205		Yes	Exclusive	4.82	3.76	1.06
4214	Karen P. Green, a married woman as her sole and separate property, and Cynthia A. Burdullis, an unmarried woman, each as to an undivided 50% interest as tenants-in-common		110-0-141-065 110-0-141-075		Yes	Exclusive	76.88	37.31	39.57
3602	Katherine Cannon & Oliver Hutchinson	Lot 02	503-0-071-025		Yes	Exclusive	29.10	19.46	9.64
3808	Kathleen Reinhard, Trustee of the Bruder-Reinhard Family Trust-Survivor's "A" Trust	Lot 8	110-0-230-375		Yes	Exclusive	13.22	12.00	1.22
3106	Keith and Laura Huss, Trustees of the Huss Family Trust dated October 22, 2013		163-0-010-755		Yes	Exclusive	34.23	23.39	10.84
3105	Kirpal Dhaliwal, et al.		163-0-020-550		Yes	Exclusive	23.25	15.89	7.36
1077	Kirschbaum, LLC	La Loma Main Ranch	109-0-031-035	02N21W04J01	Yes	Hybrid	257.00	161.36	95.64
1078	Kirschbaum, LLC	Balcom Canyon Ranch	110-0-230-125	03N20W33B03	Yes	Hybrid	65.17	34.62	30.55
1079	Lamb Trust, John B Lamb Trustee		110-0-100-215 110-0-100-235 110-0-100-265		Yes	Exclusive	13.58	8.22	5.36
1188	Larry Raymond, as Trustee of the Rayday Survivors' Trust		503-0-020-320	03N20W36G02	No	N/A	35.02	23.01	12.01
1021	Lauren A. Borchard, Trustee for the LAB Trust; Leslie K. Borchard	MCB Farms LLC - Donlon 3 Ranch	110-0-420-035		Yes	Exclusive	43.26	30.55	12.71
1020	Lauren A. Borchard, Trustee LAB Trust; Leslie K. Borchard	MCB Farms LLC, Greenhills Ranch	109-0-031-185		Yes	Exclusive	89.95	52.65	37.30
1145	Lee Stoeckle Living Trust dated 10/19/2009, Leo Stoeckle, Trustee		500-0-150-125	03N19W20G01	No	N/A	88.40	40.25	48.15

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1170	Lemon 500, LLC		112-0-010-025 112-0-010-035 112-0-010-045 112-0-010-055 112-0-010-065 112-0-010-075 112-0-010-085 112-0-010-095 112-0-010-105 112-0-010-115 112-0-010-125 112-0-010-135 112-0-020-015 112-0-020-025 112-0-020-035 112-0-020-045 112-0-020-055 112-0-020-065 112-0-020-075 112-0-020-085 112-0-020-095 112-0-020-105	02N20W06J01 02N20W06R03	No	N/A	1,126.03	770.44	355.59
1040	Leslie C. Dobson & Debra L. Dobson	Lot 3	110-0-230-335	03N20W33B04	Yes	Hybrid	16.93	12.04	4.89
3505	Lewis, James		110-0-100-145 110-0-100-160		Yes	Exclusive	25.49	18.46	7.03
3330	Lim, Basilio And Rosie Chu Lim Trustees, pledged to CCFLB		503-0-040-180 503-0-040-200		Yes	Exclusive	92.70	45.72	46.98
4253	Little Bison Farm LLC		110-0-170-180		Yes	Exclusive	90.51	44.09	46.43
1082	Los Angeles Avenue Ranch LP et al.		109-0-061-040 109-0-061-180 109-0-061-200	02N21W15M04	No	N/A	512.55	216.36	296.19
4102	Louis McCutcheon and Anne McCutcheon		500-0-140-095		Yes	Exclusive	56.57	29.15	27.42
1083	Lowe Family Trust dated 07/28/1996, David Huei-Chung and Florence Ai-Lieng Lowe Trustees		110-0-420-085		Yes	Exclusive	33.66	27.90	5.76
3346	Lucas, Thomas and Kim Darlene Staats		503-0-040-035		Yes	Exclusive	51.54	21.89	29.65
3607	Luzyro, LLC	Lot 07	503-0-072-075		Yes	Exclusive	45.29	29.88	15.41

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1196	Lynch Land & Cattle, LLC, et al.	Lynch Ranch	108-0-110-310 108-0-110-320 108-0-110-340	03N20W27B03 03N20W27G05	No	N/A	37.99	37.99	0.00
1159	Magana Ranch, LLC		110-0-060-165 110-0-430-025	03N20W34J01 03N20W34J01m3 03N20W34J02 03N20W34J03 03N20W34J03m3	No	N/A	145.38	68.59	76.79
1084	Mahan Ranch, et al		110-0-060-645 110-0-060-695 110-0-071-095 110-0-071-115 110-0-071-265	03N20W34J01 03N20W34J01m3 03N20W34J02 03N20W34J03 03N20W34J03m3	Yes	Hybrid	184.49	104.01	80.47
4205	Mariette L. Menne, Trustee of The Patricia A. Menne Survivor's Trust, created for the benefit of the surviving spouse, under the terms of The David and Patricia Menne Family Trust Dated August 23, 1999, as Amended		155-0-270-035		Yes	Exclusive	87.07	87.07	0.00
4215	Marilyn E. Smith, Trustee, Marilyn E. Smith 1997 Revocable Trust dated May 14, 1997		110-0-141-080		Yes	Exclusive	18.77	11.74	7.03
3619	Mark A. Mallas and Dawn-Marie Johnson, Trustees of the Mallas Family Trust Dated 7-9-1991, and Mark A. Mallas	Lot 19	503-0-072-105		Yes	Exclusive	54.19	29.29	24.90
3210	Mark Ellrott		108-0-161-105	03N20W27H02	Yes	Hybrid	1.85	1.85	0.00
1119	Mark Ratto, Trustee of the Mark Ratto Revocable Living Trust dated February 2, 2016		110-0-060-635 110-0-200-185	03N20W34J03m4	No	N/A	67.40	45.87	21.53
3207	Marlene Valter		110-0-230-045		Yes	Hybrid	0.89	0.89	0.00
4202	Marshall T. Allen and Concepcion V. Allen, as co-trustees of the Marshall T. Allen and Concepcion V. Allen 1990 Revocable Inter Vivos Trust u/d/t dated December 5, 1990		110-0-170-375 110-0-170-385		Yes	Exclusive	12.38	12.26	0.12
3316	Maryann McCormick		110-0-072-060 110-0-080-080		Yes	Exclusive	65.37	34.58	30.79
1094	Mastro Culbert Farms, LLC & Steven Mastro		500-0-130-135 500-0-130-155 500-0-130-165 500-0-130-175	03N19W30F01	No	N/A	232.40	109.86	122.54

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1095	McGonigle Trust, John McGonigle		109-0-031-025	02N21W18A01 02N21W18H08 02N21W18H11	Yes	Hybrid	130.05	78.65	51.41
3306	McMahon, Julian		110-0-210-320		Yes	Exclusive	36.13	15.15	20.98
1076	Michael D. and Merrie Kelley, Trustee for the Michael and Merrie 2008 Revocable Family Trust, dba Triangle K. Farms		110-0-040-410 110-0-160-195 110-0-160-215 110-0-160-225 110-0-170-300	02N0W07R03 02N20W08M01	No	N/A	143.95	70.69	73.25
4101	Miguel Magdaleno, Jr., Trustee of the Magdaleno Living Trust dated April 4, 2002		500-0-140-065		Yes	Exclusive	17.16	10.12	7.04
3331	Miguel Magdaleno, Trustee of the Miguel Magdaleno Living Trust Dated April 4, 2002		163-0-020-745 163-0-020-755 163-0-020-775 163-0-020-785 163-0-031-365 163-0-031-375	02N20W10N01	Yes	Hybrid	466.19	263.40	202.79
3506	Milligan Ranch Partnership, LP		110-0-092-140 110-0-092-230		Yes	Exclusive	175.32	141.10	34.22
1098	Mittag Farms	RC - Farms	109-0-050-260 109-0-050-370	02N21W16N03	No	N/A	307.89	307.89	0.00
1099	Mittag Farms	RMD - Farms	110-0-010-010 110-0-010-080 110-0-010-145 110-0-132-160 110-0-132-240	02N21W01L01 02N21W11A03 03N21W36Q01	Yes	Hybrid	1,089.46	904.97	184.49
1100	Mittag Ranches	Rancho Enrique	109-0-050-330	02N21W17F05	No	N/A	226.22	196.55	29.67
1101	Mittag Ranches	RMD - Ranches	110-0-120-130 110-0-120-215 110-0-120-220 110-0-132-040 110-0-132-150 110-0-132-230 110-0-141-130	02N21W11A02	Yes	Hybrid	613.66	576.75	36.91

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WMID	Landowner	Ranch / Property Name	Parcels	Wells	Mutual Water Company Shareholder	Mutual Water Company Type	Allocation Basis (AF)	Base Agricultural Allocation (AF)	Supplemental Agricultural Allocation (AF)
1102	Mittag Ranches	RC - Ranches & Judith	109-0-061-055 109-0-061-135 109-0-061-260	02N21W16J03	Yes	Hybrid	344.03	344.03	0.00
3616	Moshe Ben-Dayan & Stephanie McColgan	Lot 16	503-0-072-225		Yes	Exclusive	56.34	23.63	32.72
1106	Mueller Family Trust, Scott R. Mueller		110-0-420-055		Yes	Exclusive	21.85	21.85	0.00
3608	Mustang Creek Ranch, LLC	Lot 08	503-0-072-155		Yes	Exclusive	70.83	29.84	40.99
4259	Nancy D. O'Reilly		110-0-200-305		Yes	Exclusive	0.99	0.99	0.00
1135	Newman Trust dated 01/27/2000, Ronald Newman, Trustee		503-0-020-300	03N20W36L01	No	N/A	29.43	17.10	12.33
4260	Nicandro Luna and Ernestina Luna, husband and wife, as joint tenants		110-0-240-115		Yes	Exclusive	1.83	0.92	0.91
1111	Oro Del Norte, LLC		110-0-092-190		Yes	Exclusive	382.72	266.20	116.52
3612	Patrice McNicoll	Lot 12	503-0-072-255 503-0-072-265		Yes	Exclusive	73.43	39.75	33.68
1162	Patsy D. Waters, Trustee for the 1994 Bypass Trust		500-0-210-105		Yes	Exclusive	90.49	45.01	45.48
3204	Patty Grubman (The City Farm)		108-0-180-075 108-0-180-095	03N20W27G07	Yes	Hybrid	20.83	16.84	3.99
4261	Paul D. Burns and Lisa A. Burns, Co-trustees of the Paul and Lisa Burns Family Trust		163-0-010-495 163-0-010-815 163-0-010-835		Yes	Exclusive	16.46	6.90	9.56
1108	Paul Naumes, Trustee for the Paul Naumes 2013 Living Trust, San Joaquin Door & Supply, Inc.		108-0-162-125 108-0-162-155 108-0-162-175 108-0-162-195 108-0-162-205	03N20W26C02	No	N/A	82.14	42.71	39.43
3807	Paul R. Jacques	Lot 7	110-0-230-365		Yes	Exclusive	0.59	0.55	0.04
3609	PenMeg LLC	Lot 09	503-0-072-325		Yes	Exclusive	126.44	55.21	71.22
3618	PenMeg, LLC	Lot 18	503-0-072-095		Yes	Exclusive	56.88	29.98	26.91
1112	Placco, LLC	PR1	155-0-270-200 155-0-270-275		Yes	Exclusive	272.58	168.20	104.38
1113	Placco, LLC	PR2	110-0-010-155		Yes	Exclusive	58.54	44.34	14.20

Exhibit C: Groundwater Allocation Schedule

Agricultural Allocations

WMID	Landowner	Ranch / Property Name	Parcels	Wells	Mutual Water Company Shareholder	Mutual Water Company Type	Allocation Basis (AF)	Base Agricultural Allocation (AF)	Supplemental Agricultural Allocation (AF)
1114	Placco, LLC	PR3	163-0-010-270 163-0-010-320 163-0-010-330 163-0-010-370 163-0-010-420 163-0-010-430 163-0-010-440 163-0-010-450 163-0-010-460 163-0-010-480	02N20W16B06	Yes	Hybrid	421.43	288.35	133.08
1115	Placco, LLC	PR4	155-0-270-215 155-0-270-230 155-0-270-280 155-0-270-290 155-0-270-305 155-0-270-315 155-0-270-325	02N21W13A01	Yes	Hybrid	518.58	330.45	188.13
3507	Plum Vista		109-0-042-065		Yes	Exclusive	227.27	227.27	0.00
4216	Price Road Ranch Partners, LLC		110-0-141-100 110-0-141-140		Yes	Exclusive	105.97	81.68	24.30
1116	Quine Ranch LP		500-0-090-185	03N19W30D02	No	N/A	88.04	42.28	45.76
3508	R Attilio/D Vanoni		109-0-032-040 109-0-032-050		Yes	Exclusive	109.83	78.98	30.85
4262	Rancho Largo, LLC		110-0-120-155		Yes	Exclusive	28.62	28.62	0.00
4217	Rancho Limonada LLC		110-0-170-330 110-0-170-340 110-0-170-350 110-0-170-405 110-0-170-445 110-0-170-505 110-0-170-525 110-0-170-545		Yes	Exclusive	211.86	137.47	74.39
1120	RBV 2+5, LLC		109-0-032-150 109-0-032-160	02N21W18A01 02N21W18H08 02N21W18H11 02N21W04Q02m2	Yes	Hybrid	56.38	48.82	7.55

Exhibit C: Groundwater Allocation Schedule

Agricultural Allocations

WMID	Landowner	Ranch / Property Name	Parcels	Wells	Mutual Water Company Shareholder	Mutual Water Company Type	Allocation Basis (AF)	Base Agricultural Allocation (AF)	Supplemental Agricultural Allocation (AF)
1121	RBV-Vanoni, LLC		109-0-032-170 109-0-042-050 109-0-042-100	02N21W18A01 02N21W18H08 02N21W18H11 02N21W04Q02m2	Yes	Hybrid	189.55	167.74	21.81
1146	Richard Sundberg and Odelia Sundberg		503-0-040-055		Yes	Exclusive	50.41	24.59	25.82
1015	Roberta Ann Bianchi Trust dated 04/25/1988, Roberta Ann Bianchi, Trustee		110-0-092-170		Yes	Exclusive	43.28	43.28	0.00
1016	Roberta Ann Bianchi Trust dated 04/25/1988, Roberta Ann Bianchi, Trustee		110-0-092-210		Yes	Exclusive	45.61	45.61	0.00
3603	Rodney A. Spicer & Suzan R. Hall-Spicer	Lot 03	503-0-071-015		Yes	Exclusive	1.45	1.02	0.43
4103	Romas		500-0-140-015		Yes	Exclusive	306.21	128.41	177.80
1163	Ronald and Nickoletta Partain Family Trust, Ronald Partain, Trustee	Wild Swan Ranch	503-0-020-145	03N19W17Q01	No	N/A	30.83	16.70	14.13
3703	Ronald V. Boch and Lois R. Boch, Trustees of the Boch Family Revocable Trust dated November 4, 1998		110-0-010-185		Yes	Exclusive	48.14	25.44	22.70
3343	Rosales, Rojalio		110-0-071-050		Yes	Exclusive	17.90	10.17	7.73
3104	Roy T. Butera, Trustee of the Butera Family Trust dated March 9, 1998		163-0-020-605		Yes	Exclusive	28.44	19.43	9.00
1004	Samuel and Sylvia Alvarez Family Revocable Trust dated 02/20/1998, Samuel and Sylvia Alvarez, Trustees		110-0-200-090		Yes	Exclusive	88.67	59.05	29.62
1005	Samuel and Sylvia Alvarez Family Revocable Trust dated 02/20/1998, Samuel and Sylvia Alvarez, Trustees		110-0-200-080 110-0-200-100		Yes	Exclusive	98.15	67.15	31.00
1123	Santa Clara Avenue Oxnard, LP, a Delaware limited partnership		109-0-050-240	02N21W17M03	No	N/A	298.41	180.36	118.05
1124	Santa Elena Farms, LLC, a California limited liability company		109-0-032-135 109-0-032-145		Yes	Exclusive	158.92	94.18	64.74
1125	Santa Paula Hay & Grain and Ranches, LLC	Waters Ranch	503-0-072-055		Yes	Exclusive	64.69	27.13	37.56
1129	Santa Paula Hay & Grain and Ranches, LLC	Balcom Canyon (2018)	503-0-040-120 503-0-040-130 503-0-040-140	02N20W11D01	Yes	Hybrid	237.02	162.17	74.85
3344	Sasaki and Suzuki, pledged to Equitable (Laguna Sasaki)		110-0-072-020		Yes	Exclusive	31.49	13.20	18.28

Exhibit C: Groundwater Allocation Schedule

Agricultural Allocations

WMID	Landowner	Ranch / Property Name	Parcels	Wells	Mutual Water Company Shareholder	Mutual Water Company Type	Allocation Basis (AF)	Base Agricultural Allocation (AF)	Supplemental Agricultural Allocation (AF)
1138	Seacoast Farms, LLC		109-0-041-160 109-0-041-180	02N21W08G04 02N21W08H03 02N21W17D03	No	N/A	692.97	497.71	195.26
3313	Servin, Vincent W. Trust, pledged CCFLB		503-0-040-045		Yes	Exclusive	58.38	34.10	24.28
1140	Sharlee C. Carnes; Meredith C. Horton; Michael E. Culbert	Culbert Home Ranch	155-0-270-070 155-0-270-095		Yes	Exclusive	75.57	66.01	9.56
3302	Shen, Xiaoyang		110-0-072-040		Yes	Exclusive	18.72	13.21	5.51
4247	Somis Farm, LLC		110-0-150-050		Yes	Exclusive	78.30	45.52	32.79
4213	Soon Ja Lee, as Trustee of The Lee Family Trust, dated March 19, 1988		110-0-150-065		Yes	Exclusive	54.44	35.77	18.67
3102	Spencer E. Love		163-0-010-620		Yes	Exclusive	28.07	19.18	8.89
3103	Spencer E. Love		163-0-020-565		Yes	Exclusive	1.34	0.91	0.42
1142	Stagola, Inc.	Balcom Ranch Road	110-0-220-010	02N20W03K03	No	N/A	458.11	192.11	266.00
3702	Steve George and Michele R. George, Trustees of the George Family Revocable Trust, dated January 25, 2005		110-0-010-175		Yes	Exclusive	21.97	21.66	0.31
3704	Steve George and Michele R. George, Trustees of the George Family Revocable Trust, dated January 25, 2006		110-0-010-195		Yes	Exclusive	24.96	24.96	0.00
1144	Stevens Trust, Kathleen/Leon Scott Stevens		109-0-050-085 109-0-050-125 109-0-050-185	02N21W20A01 02N21W20A02 02N21W21D04	No	N/A	224.79	173.83	50.96
1148	Sunshine Agriculture, Inc.	Main Ranch	110-0-050-010 110-0-050-030	02N20W04B01 02N20W04F01 02N20W04F02 03N20W34L01 03N20W34L02	No	N/A	2,029.99	1,015.00	1,015.00
3345	Tash Trust, George and Debra as Trustees		110-0-210-290		Yes	Exclusive	51.61	21.64	29.97
4225	Terry Noriega, as Trustee of the Noriega Family Trust dated January 26, 1996		161-0-010-180		Yes	Exclusive	42.21	32.41	9.80
4226	Terry Noriega, as Trustee of the Noriega Family Trust dated January 26, 1996		161-0-010-170		Yes	Exclusive	47.76	33.03	14.73
4232	The Lim Family Trust U/D/T 02-01-90, Basilio Y. Lim, Trustee and Rosie C. Lim, Trustee		110-0-200-195		Yes	Exclusive	40.05	20.42	19.63
1193	Thomas A. Kestly, as Trustee for the Thomas A. Kestly Family Trust 2003	K-1 Ranch a.k.a. Kestly AG	503-0-030-305	03N20W36P01	No	N/A	37.97	22.54	15.43

Exhibit C: Groundwater Allocation Schedule

Agricultural Allocations

WMID	Landowner	Ranch / Property Name	Parcels	Wells	Mutual Water Company Shareholder	Mutual Water Company Type	Allocation Basis (AF)	Base Agricultural Allocation (AF)	Supplemental Agricultural Allocation (AF)
1143	Thomas Staben	Lemon Ranch	163-0-010-805 163-0-010-825 163-0-020-765 163-0-020-795		Yes	Exclusive	59.79	41.08	18.71
3509	Thompson, Brian		110-0-110-145		Yes	Exclusive	14.71	11.29	3.41
1189	Timothy Hoke and Barbara Hoke		503-0-060-145	02N20W01E03	No	N/A	46.55	21.77	24.78
3801	Timothy W. Huddleston and Lisa M. Huddleston	Lot 1	110-0-230-315		Yes	Exclusive	11.61	11.61	0.00
3203	Tom & Ruth Millington		108-0-100-155		Yes	Hybrid	4.72	2.44	2.29
1152	Tschirhart Trust, Donald/Jean		108-0-140-285 110-0-040-105 110-0-040-165 110-0-040-425	03N20W32H03 03N20W32K01	No	N/A	206.35	193.14	13.21
1153	Urban-D Ranch Limited Partnership		110-0-220-050	02N20W10G01	Yes	Hybrid	157.93	93.77	64.16
4221	Urban-D Ranch Limited Partnership		161-0-050-030		Yes	Exclusive	23.57	9.89	13.69
1041	US Horticulture Farmland		503-0-040-255 503-0-040-265 503-0-040-285 503-0-040-295	02N20W02N03 02N20W02N03m2	Yes	Hybrid	402.14	275.86	126.28
3338	Valley Growers (Under Tash APN)		110-0-220-085		Yes	Exclusive	27.36	15.32	12.05
3305	Ventura County Nursery		110-0-220-075		Yes	Exclusive	16.74	8.02	8.72
1154	VH Farms LP		110-0-210-330		Yes	Exclusive	31.85	17.96	13.88
3611	Vista 11, LLC	Lot 11	503-0-072-305		Yes	Exclusive	64.42	37.03	27.40
3510	Vorbeck, Alexandra		110-0-100-225 110-0-100-245 110-0-100-255		Yes	Exclusive	17.98	13.13	4.85
3610	Walter E. Johnson and Dawn-Marie Johnson, Trustees of the Johnson Family Trust	Lot 10	503-0-072-285		Yes	Exclusive	53.93	25.12	28.81
1158	Waters & Sons Farms LP	Waters & Sons Farms LP	108-0-170-115 500-0-090-165	03N19W30D02	No	N/A	93.55	51.54	42.00
3205	Waters Family Ranches Oasis - Caldwell Morris K Tr		110-0-060-465		Yes	Hybrid	23.94	23.94	0.00
1156	Waters Ranch, LP		500-0-130-070 500-0-130-110	03N19W30E06	No	N/A	292.55	122.68	169.87
1157	Waters Ranch, LP		500-0-200-040 500-0-210-110 500-0-210-240		Yes	Exclusive	348.16	164.12	184.04

Exhibit C: Groundwater Allocation Schedule

Agricultural Allocations

WMID	Landowner	Ranch / Property Name	Parcels	Wells	Mutual Water Company Shareholder	Mutual Water Company Type	Allocation Basis (AF)	Base Agricultural Allocation (AF)	Supplemental Agricultural Allocation (AF)
3304	Weider, Eric & Renee Lynn (6/28/21 VIK Holdings, LLC)		503-0-040-175		Yes	Exclusive	70.62	41.31	29.32
3101	Westfield Farms		163-0-020-415		Yes	Exclusive	22.91	15.66	7.26
3511	Wilhite, R.J.		110-0-092-115 110-0-092-135		Yes	Exclusive	35.50	25.02	10.48
1017	William A. Miller, Trustee of the William A. Miller Living Trust dated August 6, 2003, et al.		503-0-010-090 503-0-010-145 503-0-010-165 503-0-010-310 503-0-010-405	03N20W26J01 03N20W26R03	No	N/A	224.48	134.26	90.22
1018	William A. Miller, Trustee of the William A. Miller Living Trust dated August 6, 2003, et al.		108-0-170-090 502-0-020-180 503-0-010-325	03N20W26J01 03N20W26R03 03N19W29F07	No	N/A	41.51	18.47	23.04
1166	Wise Orchards at Somis LLC	Somis Orchards	110-0-060-385	03N20W34G01	No	N/A	92.85	42.87	49.97
1167	Wise Orchards at Somis LLC	Wise Orchards I	503-0-040-085		Yes	Exclusive	43.30	26.80	16.50
1169	Wonderful Citrus, LLC		110-0-010-065	03N21W36Q02 03N21W36R03	No	N/A	417.67	285.77	131.89
1171	Yong, Jeffrey		108-0-162-055 108-0-170-015 503-0-010-080 503-0-010-415	03N20W26H01	No	N/A	117.26	99.47	17.79
1042	Zachary Rastegar Farms, LLC	Shiloh Ranch	107-0-110-035 107-0-110-050 107-0-130-030 107-0-130-070 110-0-110-075	03N21W35P02	No	N/A	240.22	141.95	98.27
1056	Zachary Rastegar Farms, LLC		107-0-130-080 110-0-110-180	03N21W35L03	No	N/A	111.48	94.08	17.39
	Total Agricultural Allocations						**34,332.70**	**21,400.99**	**12,931.71**

Exhibit C: Groundwater Allocation Schedule

Commercial Allocations

WMID	Landowner	Ranch / Property Name	Parcels	Wells	Mutual Water Company Shareholder	Mutual Water Company Type	Allocation Basis (AF)
3208	Anderson Trust		108-0-110-120		Yes	Exclusive	5.44
3805	Catherine Hill, Trustee of the Hill Trust # 2 U/A Dated March 28, 1998	Lot 5	110-0-230-345		Yes	Exclusive	2.79
1104	City of Moorpark		506-0-010-280 506-0-010-640	02N19W08G01 02N19W08H02	No	N/A	96.76
1200	City of San Buenaventura			02N21W08L01 02N21W08L02 02N21W08L03	No	N/A	57.86
1033	Claridge, Gail, Claridge Family Trust		110-0-210-030 503-0-030-155 503-0-073-025		Yes	Exclusive	13.52
1141	Fox Canyon Farms, LLC		110-0-230-285	03N20W27N01	Yes	Hybrid	17.84
3701	George Steve T		110-0-010-165		Yes	Exclusive	5.91
3329	Gerardi, Danny		110-0-210-280		Yes	Exclusive	9.27
1057	Golf Realty Fund, LP	Spanish Hills Country Club	152-0-242-275 152-0-242-305 152-0-251-365 152-0-252-015 152-0-261-035 152-0-261-075 152-0-261-095 152-0-261-105 152-0-261-115 152-0-261-125 152-0-261-135 152-0-261-145 152-0-261-155 152-0-262-075 152-0-281-165 152-0-283-065	02N21W28C01	No	N/A	201.23
3202	Julie Rhoads		110-0-230-055		Yes	Hybrid	10.55

Exhibit C: Groundwater Allocation Schedule

Commercial Allocations

WMID	Landowner	Ranch / Property Name	Parcels	Wells	Mutual Water Company Shareholder	Mutual Water Company Type	Allocation Basis (AF)
3325	Marschewski, Thomas A. and Alison Rae Choate Marschewski		110-0-071-145		Yes	Exclusive	7.02
3318	Maskrey, Francis and Joan		110-0-210-240		Yes	Exclusive	25.24
1096	Mesa Union School District		109-0-050-320 109-0-050-340 109-0-050-350 109-0-050-360	02N21W17A01	Yes	Hybrid	17.00
1130	Saticoy Partners, LLC	Saticoy CC Golf	109-0-020-150 109-0-020-170 109-0-020-285 109-0-020-290 109-0-311-080 109-0-340-040	02N21W08L01 02N21W08L02 02N21W08L03	No	N/A	304.66
1137	Saticoy Properties LLC/Grimes Rock Inc * Transfer of this Allocation Basis is limited to 50% of the total.		500-0-050-135 500-0-090-055 500-0-090-260 500-0-090-270 500-0-090-280 500-0-090-290 500-0-090-325 500-0-090-355 500-0-090-365	03N19W18Q01	No	N/A	180.00
1147	Sunshine Agriculture, Inc.	Stines Property	110-0-230-355		Yes	Exclusive	1.53
3340	The Azmoun Family Trust 2003		110-0-071-275		Yes	Exclusive	4.96

Exhibit C: Groundwater Allocation Schedule

Commercial Allocations

WMID	Landowner	Ranch / Property Name	Parcels	Wells	Mutual Water Company Shareholder	Mutual Water Company Type	Allocation Basis (AF)
2011	Ventura County Waterworks District No. 1 - ELPMA		N/A	03N19W31B01 03N19W31H01 03N19W32D01 03N19W33P03 03N20W35J01 03N20W35R01 03N20W36A02 03N20W36G01	N/A	N/A	2,661.76
2191	Ventura County Waterworks District No. 19 - ELPMA		N/A	02N20W03J01	N/A	N/A	499.71
2192	Ventura County Waterworks District No. 19 - WLPMA		N/A	02N20W06R01 02N20W08B01	N/A	N/A	1,990.46
1172	ZIP TWO, LLC		111-0-010-025 111-0-010-035 111-0-010-065 111-0-010-075 111-0-010-095 111-0-010-115 111-0-010-125	02N21W21E01	No	N/A	326.52
	Total Commercial Allocations						**6,440.03**

Exhibit C: Groundwater Allocation Schedule

Domestic Allocations

WMID	Landowner	Ranch / Property Name	Parcels	Wells	Allocation Basis (AF)
4229	Arnold and Sandra Peterson, husband and wife as joint tenants		110-0-382-215		2.03
1186	Bill Poole		110-0-230-235	03N20W28P02	1.00
1177	Butler Ranch Mutual Water Company (Domestic - Conditional)		See Exhibit G		24.00
3400	Crestview Mutual Water Company (Domestic)		See Exhibit E	02N21W22A01 02N21W22G01 02N21W28A02	717.00
3536	Del Norte Water Company (Domestic - Conditional)		See Exhibit H		25.00
3535	Del Norte Water Company (Domestic)		See Exhibit F		48.99
3332	Ehrhardt, Louis and Patricia, pleded to Weyehaeuser Mortgage		110-0-080-090		1.00
1185	Fox Canyon Farms, LLC		110-0-230-285	03N20W27N05	1.00
4239	Frank Keith McCallion and Janell Case		110-0-240-105		1.73
1182	Hagel, Timothy et al	Meadows of Moorpark	108-0-161-115	03N20W26C01 03N20W26D01	1.00
1074	Hypericum Land Company LLC; Hypericum Interests LLC (Domestic - Conditional)		See Exhibit G		24.00
1131	James A. Waters III, Trustee For The J&H Revocable Trust; James A. Waters III, Trustee For The Andrew Exempt Trust	Balcom Canyon Ranch	108-0-100-025	03N20W28J05	1.08
3706	John R. Mathes, Trustee of the Jhn R. Mathis Trust U/T/A Dated August 7, 1992	Lot 8	110-0-110-195		3.44
1183	Julie Rhoads		110-0-230-055	03N20W27M01m2	1.05
1184	Marlene Valter		110-0-230-045	03N20W27M01	1.00
4258	Michael A. Spahr and Jeanne M. Spahr, Trustees of the Spahr 2000 Family Trust Dated May 10, 2000		110-0-240-225		1.84
4267	Michael James Kytlica and Vladimir Ian Kytlica		110-0-240-485		1.36
1107	Mittag Ranches	RC - Domestic Well	109-0-061-260	02N21W16A01	1.00
3308	The Kirstin K. Doss Trust		110-0-071-175		2.69
1187	Waters Family Ranches Oasis - Caldwell Morris K Tr		110-0-060-465	03N20W27K02	1.00
	Total Domestic Allocations				**861.21**

Exhibit C: Groundwater Allocation Schedule

Mutual Water Company Allocations

WMID	Mutual Water Company	Wells	Mutual Water Company Allocation
3100	Arroyo Las Posas Mutual Water Company	02N20W16B03	0.00
3200	Balcom-Bixby Water Association Inc., a California corporation	03N20W27H01 03N20W27H03	27.02
3300	Berylwood Heights Mutual Water Company	02N20W02D02 02N20W03B01 02N20W03H01 03N20W34K01	46.43
3500	Del Norte Water Company	02N21W09D02 02N21W09N01 02N21W18H01 02N21W18H03 02N21W18H10 02N21W18H12 02N21W18H14	40.34
3600	Fuller Falls Mutual Water Company	03N20W35G01 03N20W35H03	0.00
3700	La Loma Ranch Mutual Water Company	03N21W35R01 03N21W35R02	0.00
3800	Las Lomas Mutual Water Company	03N20W33B01 03N20W33B02	0.00
3900	Rancho Canada Water Company LLC	02N20W05J01	0.00
4100	Thermic Mutual Water Company	03N19W29M02 03N19W29M03 03N19W30J01 03N19W30Q01	0.00
4200	Zone Mutual Water Company	02N20W04R03 02N20W07R02 02N20W07R03 02N20W08E01 02N20W08F01 02N20W08M01 02N20W08Q01 02N20W09F01 02N20W09Q04 02N20W09Q05 02N20W09Q07 02N20W09R01	103.84
	Total Mutual Water Company Allocations		**217.64**

Appendix F
Annual Allocations Calculation

LPV Agricultural Allocations Water Year 2023 (03/04/2024)

WMID	Landowner	Ranch / Property Name	Parcels	Allocation Basis (AF)	Base Agricultural Allocation (AF)	Supplemental Agricultural Allocation (AF)	Annual Supplemental Allocation (AF)	Annual Allocation (AF) Water Year 2023	Mutual Water Company Type	Mutual Water Company
1001	49 Acres Scholle Ranch LP		1100091010 1100091020 1100091030 1100120080 1100120160 1100120170	368.02	248.46	119.56	106.19	**354.65**	Hybrid	Del Norte
1002	Aggen Associates, LLC		1100141020 1100142010	164.71	158.61	6.10	5.42	**164.03**	N/A	N/A
1003	Aggen Partners, LP		1100142075 1100142140	219.09	148.03	71.05	63.10	**211.13**	Hybrid	Zone
1004	Samuel and Sylvia Alvarez Family Revocable Trust dated 02/20/1998, Samuel and Sylvia Alvarez, Trustees		1100200090	88.67	59.05	29.62	26.31	**85.36**	Exclusive	Zone
1005	Samuel and Sylvia Alvarez Family Revocable Trust dated 02/20/1998, Samuel and Sylvia Alvarez, Trustees		1100200080 1100200100	98.15	67.15	31.00	27.53	**94.68**	Exclusive	Zone
1006	Apricot Lane Farm Holdings, LLC	Main - Broadway	5030010025 5030010030 5030010040 5030010335 5030010395 5030020125 5030020260 5030020425	295.51	137.69	157.82	140.17	**277.86**	N/A	N/A
1007	Apricot Lane Farm Holdings, LLC	Stockton	1080170025 1080170035	67.72	57.57	10.15	9.01	**66.58**	N/A	N/A
1008	Bryce and Elaine Bannatyne Trust, Bryce Bannatyne, Trustee	Rancho Resplandor Sand Canyon	1100200240	27.43	27.31	0.12	0.11	**27.42**	N/A	N/A
1009	Bryce and Elaine Bannatyne Trust, Bryce Bannatyne, Trustee	Rancho Resplandor Moorpark	5020060010	219.05	92.96	126.09	111.99	**204.95**	N/A	N/A
1010	Bell Ranch Investors, LLC		1560180350 1560180360 1560180430	583.35	244.63	338.72	300.83	**545.46**	N/A	N/A
1011	John W. Borchard Ranches, Inc., a California corporation	Reiman Ranch	1100133230 1100133240	264.51	180.19	84.32	74.89	**255.08**	Exclusive	Zone
1012	John W. Borchard Ranches, Inc., a California corporation	Goodyear Ranch	1100133200 1100150115	67.49	45.98	21.52	19.11	**65.09**	Exclusive	Zone
1013	Berkshire Investments, LLC, a California limited liability company		5030050225 5030050245	81.00	47.86	33.13	29.42	**77.28**	N/A	N/A
1014	Berylwood Ranch, LLC, a California limited liability company		1100020090 1100020100	235.38	107.92	127.46	113.20	**221.12**	Exclusive	Zone
1015	Roberta Ann Bianchi Trust dated 04/25/1988, Roberta Ann Bianchi, Trustee		1100092170	43.28	43.28	0.00	0.00	**43.28**	Exclusive	Del Norte
1016	Roberta Ann Bianchi Trust dated 04/25/1988, Roberta Ann Bianchi, Trustee		1100092210	45.61	45.61	0.00	0.00	**45.61**	Exclusive	Del Norte
1017	William A. Miller, Trustee of the William A. Miller Living Trust dated August 6, 2003, et al.		5030010090 5030010145 5030010165 5030010310 5030010405	224.48	134.26	90.22	80.13	**214.39**	N/A	N/A

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1018	William A. Miller, Trustee of the William A. Miller Living Trust dated August 6, 2003, et al.		1080170090 5020020180 5030010325	41.51	18.47	23.04	20.46	**38.93**	N/A	N/A
1019	John W. Borchard, Jr., Trustee of the John W. Borchard, Jr. Trust dated May 12, 1971	Baptiste Ranch	1100170645	48.23	30.02	18.21	16.17	**46.19**	Exclusive	Zone
1020	Lauren A. Borchard, Trustee LAB Trust; Leslie K. Borchard	MCB Farms LLC, Greenhills Ranch	1090031185	89.95	52.65	37.30	33.13	**85.78**	Exclusive	Del Norte
1021	Lauren A. Borchard, Trustee for the LAB Trust; Leslie K. Borchard	MCB Farms LLC - Donlon 3 Ranch	1100420035	43.26	30.55	12.71	11.29	**41.84**	Exclusive	Rancho Canada
1022	Borchard, Patricia C. Trust, John Borchard Trustee		1090031175	99.92	62.29	37.62	33.41	**95.70**	Exclusive	Del Norte
1023	Broadway Road Moorpark, LLC, a Delaware limited liability company		5020020030	149.97	62.89	87.08	77.34	**140.23**	Exclusive	Thermic
1024	John S. Broome Trust dated June 1, 1967, John S. Broome, Jr., Trustee, et al.	Escabitas	1090050135 1090050205	214.57	149.58	64.99	57.72	**207.30**	N/A	N/A
1025	John S. Broome Trust dated June 1, 1967, John S. Broome, Jr., Trustee, et al.	Colina	1100200065	83.37	41.39	41.98	37.28	**78.67**	Hybrid	Zone
1026	Bruecker 2005 Revocable Family Trust, Kenneth A. and Juli A. Bruecker, Co-Trustees		5030060225 5030060235 5030060255 5030060325	87.15	68.42	18.73	16.63	**85.05**	N/A	N/A
1027	Burdullis Ranches LLC		1100420025	39.37	36.76	2.61	2.32	**39.08**	Exclusive	Rancho Canada
1028	Burdullis Ranches LLC		1100420045	37.22	30.79	6.43	5.71	**36.50**	Exclusive	Rancho Canada
1030	Green Hills Ranch, LLC	Green Hills Ranch	1090031065 1090031095 1090031125 1090031155	338.16	213.40	124.76	110.80	**324.20**	Exclusive	Del Norte
1031	Glen and Kim T. Carmichael, Co-Trustees of the Glen and Kim T. Carmichael Joint Living Trust and Carmichael Farms Trust		1070130195 1070130205 1070130255 1100100025	193.46	148.93	44.53	39.55	**188.48**	Hybrid	Del Norte
1032	John-Yon Chang		5030050320	230.66	100.48	130.17	115.61	**216.09**	N/A	N/A
1034	Ann Cooluris, Trustee of the Ann C. Cooluris Trust, et al.		1100150085	164.41	112.49	51.92	46.11	**158.60**	Exclusive	Zone
1035	Culbert Farms LLC; Cristina Marie Kildee; Delcia Ann Giacalone; Jennifer Elizabeth Kildee; Richard D. Culbert; Michael Kenneth Kildee; Kevin Bertis Kildee	Culbert 60 Ranch	1100142100	80.73	73.86	6.87	6.10	**79.96**	Exclusive	Zone
1036	D&D Coastal, LLC		1080180065	32.79	14.19	18.60	16.52	**30.71**	Hybrid	Balcom-Bixby
1037	DeBoni Corporation		1100141090	120.66	80.81	39.85	35.39	**116.20**	Hybrid	Zone
1038	DeBoni Corporation		1100092160 1100093010	116.22	105.01	11.21	9.96	**114.97**	Exclusive	Del Norte
1039	Dent Ranch, LP		5000210220	23.49	10.09	13.41	11.91	**22.00**	Exclusive	Thermic
1040	Leslie C. Dobson & Debra L. Dobson	Lot 3	1100230335	16.93	12.04	4.89	4.34	**16.38**	Hybrid	Las Lomas
1041	US Horticulture Farmland		5030040255 5030040265 5030040285 5030040295	402.14	275.86	126.28	112.15	**388.01**	Hybrid	Berylwood
1042	Zachary Rastegar Farms, LLC	Shiloh Ranch	1070110035 1070110050 1070130030 1070130070 1100110075	240.22	141.95	98.27	87.28	**229.23**	N/A	N/A

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1043	Isabella Rastegar Farms, LLC	Tara Ranch	1070120060 1070120215 1070120225 1070130145	181.17	107.06	74.12	65.83	**172.89**	Hybrid	Del Norte
1044	John Moffatt Grether, Trustee of the GST Exempt Exemption Trust and the Survivors Administrative Trust under the Grether Family Trust	Home 13	1090042130	15.39	15.39	0.00	0.00	**15.39**	Exclusive	Del Norte
1045	John W. Borchard, Jr and J. David Borchard, Co-Trustees of the Cecilia Borchard 1971 Trust for the benefit of John W. Borchard, Jr.	Perkins Ranch	1100120010	169.52	85.37	84.15	74.74	**160.11**	Exclusive	Zone
1046	Ernest Borchard Ranch Co., LLC, a California limited liability company	Thorpe Ranch	1100120060	200.41	148.36	52.05	46.23	**194.59**	Exclusive	Zone
1047	J. David Borchard and Michele A. Borchard, Co-Trustees of the J. David and Michele A. Borchard Family Trust dated September 25, 2014	DJB Ranch	1100160020	108.56	54.78	53.79	47.77	**102.55**	Exclusive	Zone
1048	John W. Borchard, Jr. and J. David Borchard, Co-Trustees of John's Exempt Residuary Trust, under the John W. Borchard 1986 Trust	Hawkins Ranch	1100131010	22.47	11.31	11.16	9.91	**21.22**	Exclusive	Zone
1049	John W. Borchard Jr. and Suzanne Borchard Kelly, Co-Trustees of the the Patricia C. Borchard Testamentary Trust for the benefit of John W. Borchard, Jr.	Knittles Ranch	1100133220 1100133250	96.58	65.44	31.15	27.67	**93.11**	Exclusive	Zone
1050	Dusty Lane LLC		1080100145	22.22	16.14	6.08	5.40	**21.54**	N/A	N/A
1051	Dusty Lane LLC		1100230255	25.47	18.50	6.97	6.19	**24.69**	Hybrid	Balcom-Bixby
1053	James D. Engel, Trustee for the James D. Engel and Kay A. Engel Trust Dated April 15, 1998	Quail Hill Enterprises, Inc.	5030020350	40.00	22.33	17.67	15.69	**38.02**	N/A	N/A
1054	Farmland Reserve, Inc.		5030060115 5030060155 5030060180	299.50	132.46	167.04	148.36	**280.82**	N/A	N/A
1055	Green Fuse Botanicals, LLC		5030040065	16.09	13.18	2.92	2.59	**15.77**	Exclusive	Berylwood
1056	Zachary Rastegar Farms, LLC		1070130080 1100110180	111.48	94.08	17.39	15.44	**109.52**	N/A	N/A
1058	Gwyn Goodman, Trustee for the Goodman Family Trust		1100071245 1100071255 1100072030	54.57	29.56	25.01	22.21	**51.77**	Exclusive	Berylwood
1059	James A. Waters, III, Trustee for The J&H Waters Revocable Trust Dated July 18, 2008 ; James A. Waters, III, Trustee for The Andrew Exempt Trust Dated June 29, 2012	Balcom Canyon Ranch	1080100025	134.58	97.74	36.84	32.72	**130.46**	Hybrid	Balcom-Bixby
1060	James A. Waters, III, Trustee for The J&H Waters Revocable Trust Dated July 18, 2008; James A. Waters, III, Trustee for The Andrew Exempt Trust Dated June 29, 2012	Hawley Ranch	1100080100	143.26	77.24	66.02	58.64	**135.88**	Exclusive	Berylwood
1061	James A. Waters, III, Trustee for The J&H Waters Revocable Trust Dated July 18, 2008	Bard Ranch	5030020370	35.00	20.10	14.90	13.23	**33.33**	N/A	N/A
1062	John Moffatt Grether, Trustee of the Helen B. Grether Trust, the GST Exempt Exemption Trust, and the Survivors Adminstrative Trust under the Grether Family Trust	Home Ranch	1090042120	105.74	102.65	3.08	2.74	**105.39**	Exclusive	Del Norte
1063	Elizabeth B. Grether Trust, Elizabeth B. Grether, Trustee		1550270255	150.40	119.05	31.36	27.85	**146.90**	Exclusive	Zone

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1064	April First Trust dated 01/15/2001, John M. Grether and Elizabeth B. Grether, Trustees	Russell	1100092260	56.22	56.22	0.00	0.00	**56.22**	Exclusive	Del Norte
1065	April First Trust dated 01/15/2001, John M. Grether and Elizabeth B. Grether, Trustees	Rita	1100133085	29.60	16.85	12.75	11.32	**28.17**	N/A	N/A
1066	April First Trust dated 01/15/2001, John M. Grether and Elizabeth B. Grether, Trustees	Selia	1100141125	53.46	49.44	4.02	3.57	**53.01**	Exclusive	Zone
1068	Jose de Jesus and Maria de la Cruz Gutierrez, Joint Tenants		1100420095	21.06	10.97	10.09	8.96	**19.93**	Exclusive	Rancho Canada
1069	Jose de Jesus and Maria de la Cruz Gutierrez, Joint Tenants		1100420105	15.30	15.30	0.00	0.00	**15.30**	Exclusive	Rancho Canada
1070	Hacobian, Edward/Kristine		1100230215	25.00	20.50	4.50	4.00	**24.50**	Hybrid	Balcom-Bixby
1071	Hagel, Timothy et al	Meadows of Moorpark	1080161115	8.82	8.82	0.00	0.00	**8.82**	Hybrid	Balcom-Bixby
1072	Harris Endeavors, LLC		1100230145	31.63	16.60	15.03	13.35	**29.95**	N/A	N/A
1073	Higgins, Sunny May Trust et al	Snyder Ranch	1100150020 1610030030	216.71	102.41	114.30	101.51	**203.92**	Hybrid	Zone
1075	Jefferson Farms, LP		1080110330 1080180135 1080180145 1080180155 1100430105 1100430065 1100430095	663.37	285.26	378.10	335.81	**621.07**	N/A	N/A
1076	Michael D. and Merrie Kelley, Trustee for the Michael and Merrie 2008 Revocable Family Trust, dba Triangle K. Farms		1100040410 1100160195 1100160215 1100160225 1100170300	143.95	70.69	73.25	65.06	**135.75**	N/A	N/A
1077	Kirschbaum, LLC	La Loma Main Ranch	1090031035	257.00	161.36	95.64	84.94	**246.30**	Hybrid	Del Norte
1078	Kirschbaum, LLC	Balcom Canyon Ranch	1100230125	65.17	34.62	30.55	27.13	**61.75**	Hybrid	Las Lomas
1079	Lamb Trust, John B Lamb Trustee		1100100215 1100100235 1100100265	13.58	8.22	5.36	4.76	**12.98**	Exclusive	Del Norte
1080	Graham Somis Ranch, LLC	McKee Ranch	1100142085 1100142095	200.28	144.64	55.63	49.41	**194.05**	Hybrid	Zone

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1081	JG Leavens LLC and Leavens Ranches LLC		5000150115 5000150135 5000150145 5020010105 5020010115 5020030040 5020031095 5020031105 5020032045 5020040025 5020040075 5020040085 5020040095 5020040105 5020040205 5020050025 5020050035 5020050045 5020050055 5020050075 5020060035 5020060045 5020070030 5020070075 5020070085 5020070105 5020070115	1,877.76	787.45	1,090.31	968.35	**1,755.80**	N/A	N/A
1082	Los Angeles Avenue Ranch LP et al.		1090061040 1090061180 1090061200	512.55	216.36	296.19	263.06	**479.42**	N/A	N/A
1083	Lowe Family Trust dated 07/28/1996, David Huei-Chung and Florence Ai-Lieng Lowe Trustees		1100420085	33.66	27.90	5.76	5.12	**33.02**	Exclusive	Rancho Canada
1084	Mahan Ranch, et al		1100060645 1100060695 1100071095 1100071115 1100071265	184.49	104.01	80.47	71.47	**175.48**	Hybrid	Berylwood
1085	Audelio Martinez and Renato Martinez	Escondido Ranch	1100040395 1100040405	245.52	122.76	122.76	109.03	**231.79**	N/A	N/A
1086	Audelio Martinez and Renato Martinez	GTO Ranch	1100150075	100.19	59.21	40.99	36.40	**95.61**	Hybrid	Zone
1087	Audelio Martinez and Renato Martinez	Inoberry Ranch	1100180360 1100180370	400.33	216.85	183.49	162.97	**379.82**	Hybrid	Zone
1088	Audelio Martinez and Renato Martinez	Luzmar Ranch	1100160245	50.39	36.71	13.68	12.15	**48.86**	Exclusive	Zone
1089	Audelio Martinez and Renato Martinez	Palace Ranch	1100170255	74.56	34.75	39.81	35.36	**70.11**	Exclusive	Zone
1090	Audelio Martinez and Renato Martinez	Patricia Ranch	1100120055	91.72	54.44	37.27	33.10	**87.54**	Exclusive	Zone
1091	Audelio Martinez	Sand Canyon - North	1100200220	23.80	23.80	0.00	0.00	**23.80**	Exclusive	Zone
1092	Audelio Martinez	Sand Canyon - North	1100200335	29.43	22.94	6.49	5.76	**28.70**	N/A	N/A
1093	Audelio Martinez and Renato Martinez	Santa Rosa Ranch	1100160100	146.82	86.76	60.06	53.34	**140.10**	Exclusive	Zone

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1094	Mastro Culbert Farms, LLC & Steven Mastro		5000130135 5000130155 5000130165 5000130175	232.40	109.86	122.54	108.83	**218.69**	N/A	N/A
1095	McGonigle Trust, John McGonigle		1090031025	130.05	78.65	51.41	45.66	**124.31**	Hybrid	Del Norte
1097	John R. Milligan Trust dated December 11, 1998, et al.		5040021260	344.67	144.54	200.13	177.74	**322.28**	N/A	N/A
1098	Mittag Farms	RC - Farms	1090050260 1090050370	307.89	307.89	0.00	0.00	**307.89**	N/A	N/A
1099	Mittag Farms	RMD - Farms	1100010010 1100010080 1100010145 1100132160 1100132240	1,089.46	904.97	184.49	163.85	**1,068.82**	Hybrid	Zone
1100	Mittag Ranches	Rancho Enrique	1090050330	226.22	196.55	29.67	26.35	**222.90**	N/A	N/A
1101	Mittag Ranches	RMD - Ranches	1100120130 1100120215 1100120220 1100132040 1100132150 1100132230 1100141130	613.66	576.75	36.91	32.78	**609.53**	Hybrid	Zone
1102	Mittag Ranches	RC - Ranches & Judith	1090061055 1090061135 1090061260	344.03	344.03	0.00	0.00	**344.03**	Hybrid	Zone
1103	Brian L. Moore Revocable Trust dated 10/30/2009, Brian L. Moore, Trustee		1100420075	33.84	33.84	0.00	0.00	**33.84**	Exclusive	Rancho Canada
1105	Benchmark Partners Ag, LLC		5030020245 5030030275	43.60	25.08	18.52	16.45	**41.53**	N/A	N/A
1106	Mueller Family Trust, Scott R. Mueller		1100420055	21.85	21.85	0.00	0.00	**21.85**	Exclusive	Rancho Canada
1108	Paul Naumes, Trustee for the Paul Naumes 2013 Living Trust, San Joaquin Door & Supply, Inc.		1080162125 1080162155 1080162175 1080162195 1080162205	82.14	42.71	39.43	35.02	**77.73**	N/A	N/A
1109	Charles R. and Kathleen M. Northcross Family Trust dated 05/27/2000, Charles and Kathleen Northcross, Trustees		1100420015	33.01	30.59	2.42	2.15	**32.74**	Exclusive	Rancho Canada
1110	Cohen Trust of 1990, dated 11/27/1990, and restated 08/05/2010, Marc S. Cohen and Lyn M. Cohen, Co-Trustees		1100010215	14.87	8.80	6.07	5.39	**14.19**	Exclusive	La Loma Ranch
1111	Oro Del Norte, LLC		1100092190	382.72	266.20	116.52	103.49	**369.69**	Exclusive	Del Norte
1112	Placco, LLC	PR1	1550270200 1550270275	272.58	168.20	104.38	92.70	**260.90**	Exclusive	Zone
1113	Placco, LLC	PR2	1100010155	58.54	44.34	14.20	12.61	**56.95**	Exclusive	La Loma Ranch

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1114	Placco, LLC	PR3	1630010270 1630010320 1630010330 1630010370 1630010420 1630010430 1630010440 1630010450 1630010460 1630010480	421.43	288.35	133.08	118.19	**406.54**	Hybrid	Arroyo Las Posas
1115	Placco, LLC	PR4	1550270215 1550270230 1550270280 1550270290 1550270305 1550270315 1550270325	518.58	330.45	188.13	167.09	**497.54**	Hybrid	Zone
1116	Quine Ranch LP		5000090185 1090032040	88.04	42.28	45.76	40.64	**82.92**	N/A	N/A
1117	Davidson Family Trust dated 09/23/1992, Jerry Davidson, Trustee		5030020225	42.40	24.52	17.87	15.87	**40.39**	N/A	N/A
1119	Mark Ratto, Trustee of the Mark Ratto Revocable Living Trust dated February 2, 2016		1100060635 1100200185	67.40	45.87	21.53	19.12	**64.99**	N/A	N/A
1120	RBV 2+5, LLC		1090032150 1090032160	56.38	48.82	7.55	6.71	**55.53**	Hybrid	Del Norte
1121	RBV-Vanoni, LLC		1090032170 1090042050 1090042100	189.55	167.74	21.81	19.37	**187.11**	Hybrid	Del Norte
1122	Frank Russell Ranch LP		1100092250 1100120250	135.70	81.29	54.40	48.31	**129.60**	Exclusive	Del Norte
1123	Santa Clara Avenue Oxnard, LP, a Delaware limited partnership		1090050240	298.41	180.36	118.05	104.85	**285.21**	N/A	N/A
1124	Santa Elena Farms, LLC, a California limited liability company		1090032135 1090032145	158.92	94.18	64.74	57.50	**151.68**	Exclusive	Del Norte
1125	Santa Paula Hay & Grain and Ranches, LLC	Waters Ranch	5030072055	64.69	27.13	37.56	33.36	**60.49**	Exclusive	Fuller Falls
1129	Santa Paula Hay & Grain and Ranches, LLC	Balcom Canyon (2018)	5030040120 5030040130 5030040140	237.02	162.17	74.85	66.48	**228.65**	Hybrid	Berylwood
1132	John W. Borchard, Jr., Trustee of the John W. Borchard, Jr. Trust dated May 12, 1971	Mulinix Ranch	1100020130 1100020140	132.96	92.66	40.30	35.79	**128.45**	Exclusive	Zone
1133	John W. Borchard, Jr., Trustee of the John W. Borchard, Jr. Trust dated May 12, 1971	Ford Ranch	1100131020	111.70	56.26	55.44	49.24	**105.50**	Exclusive	Zone
1134	Chris Marcussen		5030020400	48.80	25.85	22.96	20.39	**46.24**	N/A	N/A
1135	Newman Trust dated 01/27/2000, Ronald Newman, Trustee		5030020300	29.43	17.10	12.33	10.95	**28.05**	N/A	N/A
1136	James A. Fitzgerald Trust No. II, Brian Fitzgerald, Trustee	Fitzgerald Ranch	5030020135	29.83	17.08	12.75	11.32	**28.40**	N/A	N/A

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1138	Seacoast Farms, LLC		1090041160 1090041180	692.97	497.71	195.26	173.42	**671.13**	N/A	N/A
1139	Gayl Family 1992 Trust, Robert Gayl, Trustee	Gayl Ranch	5030020340	29.51	26.22	3.30	2.93	**29.15**	N/A	N/A
1140	Sharlee C. Carnes; Meredith C. Horton; Michael E. Culbert	Culbert Home Ranch	1550270070 1550270095	75.57	66.01	9.56	8.49	**74.50**	Exclusive	Zone
1142	Stagola, Inc.	Balcom Ranch Road	1100220010	458.11	192.11	266.00	236.25	**428.36**	N/A	N/A
1143	Thomas Staben	Lemon Ranch	1630010805 1630010825 1630020765 1630020795	59.79	41.08	18.71	16.62	**57.70**	Exclusive	Zone
1144	Stevens Trust, Kathleen/Leon Scott Stevens		1090050385 1090050395 1090050405 1090050185	224.79	173.83	50.96	45.26	**219.09**	N/A	N/A
1145	Lee Stoeckle Living Trust dated 10/19/2009, Leo Stoeckle, Trustee		5000150125	88.40	40.25	48.15	42.76	**83.01**	N/A	N/A
1146	Richard Sundberg and Odelia Sundberg		5030040055	50.41	24.59	25.82	22.93	**47.52**	Exclusive	Berylwood
1148	Sunshine Agriculture, Inc.	Main Ranch	1100050010 1100050030	2,029.99	1,015.00	1,015.00	901.46	**1,916.46**	N/A	N/A
1150	John Moffatt Grether, Trustee of the GST Exempt Exemption Trust and the Survivor's Administrative Trust under the Grether Family Trust, dated September 12, 1989	Roberto	1100091040 1100120230	85.69	73.51	12.19	10.83	**84.34**	Hybrid	Del Norte
1151	Dorcas H. Thille, Trustee of the Dorcas H. Thille Trust		1090061070 1090061080 1090061150	148.13	109.45	38.67	34.34	**143.79**	Exclusive	Zone
1152	Tschirhart Trust, Donald/Jean		1080140285 1100040105 1100040165 1100040425	206.35	193.14	13.21	11.73	**204.87**	N/A	N/A
1153	Urban-D Ranch Limited Partnership		1100220050	157.93	93.77	64.16	56.98	**150.75**	Hybrid	Zone
1154	VH Farms LP		1100210330	31.85	17.96	13.88	12.33	**30.29**	Exclusive	Berylwood
1155	Joshua L. Waters, Trustee for the the Joshua Exempt Trust, et al.		5000210085 5000210095	87.33	46.31	41.02	36.43	**82.74**	Exclusive	Thermic
1156	Waters Ranch, LP		5000130070 5000130110	292.55	122.68	169.87	150.87	**273.55**	N/A	N/A
1157	Waters Ranch, LP		5000200040 5000210110 5000210240	348.16	164.12	184.04	163.45	**327.57**	Exclusive	Thermic
1158	Waters & Sons Farms LP	Waters & Sons Farms LP	1080170115 5000090165	93.55	51.54	42.00	37.30	**88.84**	N/A	N/A
1159	Magana Ranch, LLC		1100060165 1100430025	145.38	68.59	76.79	68.20	**136.79**	N/A	N/A

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1160	James D. Hearn and Shira C. Hearn, husband and wife	Jacoca Ranch	5030020200	24.73	24.73	0.00	0.00	**24.73**	N/A	N/A
1161	CE + D Mabry Family LP	Mabry Ranch	5030020165 5030020410 5030030290	89.62	51.25	38.37	34.08	**85.33**	N/A	N/A
1162	Patsy D. Waters, Trustee for the 1994 Bypass Trust		5000210105	90.49	45.01	45.48	40.39	**85.40**	Exclusive	Thermic
1163	Ronald and Nickoletta Partain Family Trust, Ronald Partain, Trustee	Wild Swan Ranch	5030020145	30.83	16.70	14.13	12.55	**29.25**	N/A	N/A
1166	Wise Orchards at Somis LLC	Somis Orchards	1100060385	92.85	42.87	49.97	44.38	**87.25**	N/A	N/A
1167	Wise Orchards at Somis LLC	Wise Orchards I	5030040085	43.30	26.80	16.50	14.65	**41.45**	Exclusive	Berylwood
1169	Wonderful Citrus, LLC		1100010065	417.67	285.77	131.89	117.14	**402.91**	N/A	N/A
1170	Lemon 500, LLC		1120010025 1120010035 1120010045 1120010055 1120010065 1120010075 1120010085 1120010095 1120010105 1120010115 1120010125 1120010135 1120020025 1120020035 1120020045 1120020055 1120020065 1120020075 1120020085 1120020095 1120020105	1,126.03	770.44	355.59	315.81	**1,086.25**	N/A	N/A
1171	Yong, Jeffrey		1080162055 1080170015 5030010080 5030010415	117.26	99.47	17.79	15.80	**115.27**	N/A	N/A
1178	Audelio Martinez and Renato Martinez	Somis Ranch	1610060015	73.78	40.82	32.97	29.28	**70.10**	Exclusive	Zone
1179	Ali Seyedi Revocable Trust dated 12/30/2019, Ali Seyedi, Trustee		1100420065	38.71	20.14	18.57	16.49	**36.63**	Exclusive	Rancho Canada
1180	JJM Somis Ranch, LLC	JJM Somis	1100150105	78.32	70.22	8.10	7.19	**77.41**	Exclusive	Zone
1181	Charles and Mary Wehrheim, Co-Trustees of the Wehrheim Family Trust		5030050365 5030050390	79.91	47.61	32.30	28.69	**76.30**	N/A	N/A
1188	Larry Raymond, as Trustee of the Rayday Survivors' Trust		5030020320	35.02	23.01	12.01	10.67	**33.68**	N/A	N/A
1189	Timothy Hoke and Barbara Hoke		5030060145	46.55	21.77	24.78	22.01	**43.78**	N/A	N/A
1190	Gordon and Luanne Hilton		5030020330	36.88	21.52	15.37	13.65	**35.17**	N/A	N/A
1191	Brian A. Lee and Maria G. Lee as Trustees of the Lee Family Trust	Empty Saddle Ranch	5030020150	36.65	21.80	14.84	13.18	**34.98**	N/A	N/A
1192	JRRE Horizon LLC	Rancho Vista Allegre	1100230405	66.52	39.26	27.26	24.21	**63.47**	N/A	N/A
1193	Thomas A. Kestly, as Trustee for the Thomas A. Kestly Family Trust 2003	K-1 Ranch a.k.a. Kestly AG	5030030305	37.97	22.54	15.43	13.70	**36.24**	N/A	N/A

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1194	Alfonso Gonzalez, Trustee of the Alfonso Gonzalez 2013 Separate Property Trust	Rancho San Jan	5030060285	24.91	24.91	0.00	0.00	**24.91**	N/A	N/A
1195	Brian A. Lee and Maria G. Lee as Trustees of the Lee Family Trust	Rancho Maria	5030020360	25.43	23.45	1.99	1.77	**25.22**	N/A	N/A
1196	Lynch Land & Cattle, LLC, et al.	Lynch Ranch	1080110310 1080110320 1080110340	37.99	37.99	0.00	0.00	**37.99**	N/A	N/A
1197	Charles Blanc		5030020185	28.71	20.80	7.91	7.03	**27.83**	N/A	N/A
3101	Westfield Farms		1630020415	22.91	15.66	7.26	6.45	**22.11**	Exclusive	Arroyo Las Posas
3102	Spencer E. Love		1630010620	28.07	19.18	8.89	7.90	**27.08**	Exclusive	Arroyo Las Posas
3103	Spencer E. Love		1630020565	1.34	0.91	0.42	0.37	**1.28**	Exclusive	Arroyo Las Posas
3104	Roy T. Butera, Trustee of the Butera Family Trust dated March 9, 1998		1630020605	28.44	19.43	9.00	7.99	**27.42**	Exclusive	Arroyo Las Posas
3105	Kirpal Dhaliwal, et al.		1630020550	23.25	15.89	7.36	6.54	**22.43**	Exclusive	Arroyo Las Posas
3106	Keith and Laura Huss, Trustees of the Huss Family Trust dated October 22, 2013		1630010755	34.23	23.39	10.84	9.63	**33.02**	Exclusive	Arroyo Las Posas
3107	Joseph W. and Lisa Sutter, Trustees of the Sutter Family Trust u/d/t dated October 27, 2007		1630020250 1630020280 1630020290	12.17	8.32	3.85	3.42	**11.74**	Exclusive	Arroyo Las Posas
3110	Jesus Jr. and Maribel Aguilera, Trustees of Aguilera Family 2015 Revocable Trust dated February 11, 2015		1630020210	43.74	29.89	13.85	12.30	**42.19**	Exclusive	Arroyo Las Posas
3111	Glen R. Carmichael and Kimberly T. Carmichael, Trustees of the Glen Carmichael and Kimberly Carmichael Joint Living Trust		1630010290	42.88	29.30	13.58	12.06	**41.36**	Exclusive	Arroyo Las Posas
3112	Chirag and Khushbu Dalsania		1630020585	28.21	19.27	8.93	7.93	**27.20**	Exclusive	Arroyo Las Posas
3113	Benjamin and Leonila Vazquez		1630020200	33.01	22.56	10.45	9.28	**31.84**	Exclusive	Arroyo Las Posas
3114	Alan Clark Goddard and Deborah Lynne Goddard		1630020270	0.12	0.08	0.04	0.04	**0.12**	Exclusive	Arroyo Las Posas
3201	8201 Bixby Road LLC		1080180045 1080180085	55.12	36.44	18.68	16.59	**53.03**	Exclusive	Balcom-Bixby
3203	Tom & Ruth Millington		1080100155	4.72	2.44	2.29	2.03	**4.47**	Hybrid	Balcom-Bixby
3204	Patty Grubman (The City Farm)		1080180075 1080180095	20.83	16.84	3.99	3.54	**20.38**	Hybrid	Balcom-Bixby
3205	Waters Family Ranches Oasis - Caldwell Morris K Tr		1100060465	23.94	23.94	0.00	0.00	**23.94**	Hybrid	Balcom-Bixby
3206	John & Cynthia Schoustra		1100060455	28.12	28.12	0.00	0.00	**28.12**	Hybrid	Balcom-Bixby
3207	Marlene Valter		1100230045	0.89	0.89	0.00	0.00	**0.89**	Hybrid	Balcom-Bixby
3210	Mark Ellrott		1080161105	1.85	1.85	0.00	0.00	**1.85**	Hybrid	Balcom-Bixby
3301	Aceves, Jose L. and Donald M. Herman (Plants Plus)		1100071040	16.35	10.11	6.24	5.54	**15.65**	Exclusive	Berylwood
3302	Shen, Xiaoyang		1100072040	18.72	13.21	5.51	4.89	**18.10**	Exclusive	Berylwood
3304	Weider, Eric & Renee Lynn (6/28/21 VIK Holdings, LLC)		5030040175	70.62	41.31	29.32	26.04	**67.35**	Exclusive	Berylwood
3305	Ventura County Nursery		1100220075	16.74	8.02	8.72	7.74	**15.76**	Exclusive	Berylwood
3306	McMahon, Julian		1100210320	36.13	15.15	20.98	18.63	**33.78**	Exclusive	Berylwood
3307	Balcom Canyon Ranch, LLC c/o Matthew Lamishaw		1100210100	42.19	29.87	12.32	10.94	**40.81**	Exclusive	Berylwood
3309	Avalos, Heliodoro and Yadira Trustees (Laguna - Posita Ranch)		1100072050	28.17	11.81	16.36	14.53	**26.34**	Exclusive	Berylwood
3310	Berney, Charles and Carol		1100080015 1100080060	40.81	30.20	10.61	9.42	**39.62**	Exclusive	Berylwood
3312	Hameed, Rashid & Salmeen		1100071185	16.28	12.12	4.16	3.69	**15.81**	Exclusive	Berylwood
3313	Servin, Vincent W. Trust, pledged CCFLB		5030040045	58.38	34.10	24.28	21.56	**55.66**	Exclusive	Berylwood
3316	Maryann McCormick		1100072060 1100080080	65.37	34.58	30.79	27.35	**61.93**	Exclusive	Berylwood

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3319	Foulkrod, Marc J. & Jamie Foulkrod Trustees		1100080075	21.57	15.07	6.50	5.77	**20.84**	Exclusive	Berylwood
3321	Ivan and Jennifer Amodei Family Trust		1100210270	45.64	33.45	12.19	10.83	**44.28**	Exclusive	Berylwood
3323	Becerra Roberto and Maria Trustees, pledged to CCFLB		5030040225	48.96	24.27	24.69	21.93	**46.20**	Exclusive	Berylwood
3330	Lim, Basilio And Rosie Chu Lim Trustees, pledged to CCFLB		5030040180 5030040200	92.70	45.72	46.98	41.72	**87.44**	Exclusive	Berylwood
3331	Miguel Magdaleno, Trustee of the Miguel Magdaleno Living Trust Dated April 4, 2002		1630020745 1630020755 1630020775 1630020785 1630031365 1630031375	466.19	263.40	202.79	180.11	**443.51**	Hybrid	Berylwood
3333	Javier A. Rodriguez and Gabrielle R. Rodriguez, husband and wife as community property with right of survivorship		1100071155	7.55	4.35	3.20	2.84	**7.19**	Exclusive	Berylwood
3334	Kapigian, John and Linda, pledged to Ames & Marjorie Borrell		1100071205	4.82	3.76	1.06	0.94	**4.70**	Exclusive	Berylwood
3335	Baron, Richard A. & Sandra		5030040195 5030040215	38.50	28.62	9.88	8.77	**37.39**	Exclusive	Berylwood
3338	Valley Growers (Under Tash APN)		1100220085	27.36	15.32	12.05	10.70	**26.02**	Exclusive	Berylwood
3342	Gatling, Richard E. or Bonnie L. Gatling		1100072070	13.03	12.26	0.77	0.68	**12.94**	Exclusive	Berylwood
3343	Rosales, Rojalio		1100071050	17.90	10.17	7.73	6.87	**17.04**	Exclusive	Berylwood
3344	Sasaki and Suzuki, pledged to Equitable (Laguna Sasaki)		1100072020	31.49	13.20	18.28	16.24	**29.44**	Exclusive	Berylwood
3345	Tash Trust, George and Debra as Trustees		1100210290	51.61	21.64	29.97	26.62	**48.26**	Exclusive	Berylwood
3346	Lucas, Thomas and Kim Darlene Staats		5030040035	51.54	21.89	29.65	26.33	**48.22**	Exclusive	Berylwood
3501	Biocca, Siro		1090032120	41.07	41.07	0.00	0.00	**41.07**	Exclusive	Del Norte
3502	Bliss Trust		1100100155	21.00	21.00	0.00	0.00	**21.00**	Exclusive	Del Norte
3503	Brown, Nicholas		1100110150	3.86	1.62	2.24	1.99	**3.61**	Exclusive	Del Norte
3504	Friel Las Posas LLC		1100092155	58.45	49.55	8.90	7.90	**57.45**	Exclusive	Del Norte
3505	Lewis, James		1100100145 1100100160	25.49	18.46	7.03	6.24	**24.70**	Exclusive	Del Norte
3506	Milligan Ranch Partnership, LP		1100092140 1100092230	175.32	141.10	34.22	30.39	**171.49**	Exclusive	Del Norte
3507	Plum Vista		1090042065	227.27	227.27	0.00	0.00	**227.27**	Exclusive	Del Norte
3508	R Attilio/D Vanoni			109.83	78.98	30.85	27.40	**106.38**	Exclusive	Del Norte
3509	Thompson, Brian		1100110145	14.71	11.29	3.41	3.03	**14.32**	Exclusive	Del Norte
3510	Vorbeck, Alexandra		1100100225 1100100245 1100100255	17.98	13.13	4.85	4.31	**17.44**	Exclusive	Del Norte
3511	Wilhite, R.J.		1100092115 1100092135	35.50	25.02	10.48	9.31	**34.33**	Exclusive	Del Norte
3601	Bought The Farm, LLC	Lot 01	5030071035	30.40	12.75	17.65	15.68	**28.43**	Exclusive	Fuller Falls
3602	Katherine Cannon & Oliver Hutchinson	Lot 02	5030071025	29.10	19.46	9.64	8.56	**28.02**	Exclusive	Fuller Falls
3603	Rodney A. Spicer & Suzan R. Hall-Spicer	Lot 03	5030071015	1.45	1.02	0.43	0.38	**1.40**	Exclusive	Fuller Falls
3605	Guzman Investments and Loan Inc.	Lot 05	5030072135	33.36	21.76	11.60	10.30	**32.06**	Exclusive	Fuller Falls
3606	Jeffrey S. Yong & Margaret K. Yong	Lot 06	5030072145	86.91	52.31	34.60	30.73	**83.04**	Exclusive	Fuller Falls
3607	Luzyro, LLC	Lot 07	5030072075	45.29	29.88	15.41	13.69	**43.57**	Exclusive	Fuller Falls
3608	Mustang Creek Ranch, LLC	Lot 08	5030072155	70.83	29.84	40.99	36.40	**66.24**	Exclusive	Fuller Falls
3609	PenMeg LLC	Lot 09	5030072325	126.44	55.21	71.22	63.25	**118.46**	Exclusive	Fuller Falls
3610	Walter E. Johnson and Dawn-Marie Johnson, Trustees of the Johnson Family Trust	Lot 10	5030072285	53.93	25.12	28.81	25.59	**50.71**	Exclusive	Fuller Falls
3611	Vista 11, LLC	Lot 11	5030072305	64.42	37.03	27.40	24.34	**61.37**	Exclusive	Fuller Falls

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3612	Patrice McNicoll	Lot 12	5030072255 5030072265	73.43	39.75	33.68	29.91	**69.66**	Exclusive	Fuller Falls
3613	GFO, LLC	Lot 13	5030072195 5030072275	116.89	54.58	62.31	55.34	**109.92**	Exclusive	Fuller Falls
3614	Josep J. Bilic, Trustee of the Bilic Living Trust Dated April 10, 1984	Lot 14	5030072205	59.49	29.25	30.24	26.86	**56.11**	Exclusive	Fuller Falls
3615	Fremont HGS, LLC	Lot 15	5030072215	61.95	27.05	34.90	31.00	**58.05**	Exclusive	Fuller Falls
3616	Moshe Ben-Dayan & Stephanie McColgan	Lot 16	5030072225	56.34	23.63	32.72	29.06	**52.69**	Exclusive	Fuller Falls
3617	Geraldine P. Berns, Trustee of the Geraldine P. Berns Family Trust No. One Established April 17, 1987	Lot 17	5030072035	64.88	27.21	37.67	33.46	**60.67**	Exclusive	Fuller Falls
3618	PenMeg, LLC	Lot 18	5030072095	56.88	29.98	26.91	23.90	**53.88**	Exclusive	Fuller Falls
3619	Mark A. Mallas and Dawn-Marie Johnson, Trustees of the Mallas Family Trust Dated 7-9-1991, and Mark A. Mallas	Lot 19	5030072105	54.19	29.29	24.90	22.11	**51.40**	Exclusive	Fuller Falls
3620	GFO, LLC	Lot 20	5030072235	119.18	51.74	67.44	59.90	**111.64**	Exclusive	Fuller Falls
3702	Steve George and Michele R. George, Trustees of the George Family Revocable Trust, dated January 25, 2005		1100010175	21.97	21.66	0.31	0.28	**21.94**	Exclusive	La Loma Ranch
3703	Ronald V. Boch and Lois R. Boch, Trustees of the Boch Family Revocable Trust dated November 4, 1998		1100010185	48.14	25.44	22.70	20.16	**45.60**	Exclusive	La Loma Ranch
3704	Steve George and Michele R. George, Trustees of the George Family Revocable Trust, dated January 25, 2006		1100010195	24.96	24.96	0.00	0.00	**24.96**	Exclusive	La Loma Ranch
3705	Bruce Bennett and Patricia Conway Bennett, Trustees of the Bruce Bennett and Patricia Conway Bennett Trust established January 7, 2007		1100010205	12.57	12.57	0.00	0.00	**12.57**	Exclusive	La Loma Ranch
3801	Timothy W. Huddleston and Lisa M. Huddleston	Lot 1	1100230315	11.61	11.61	0.00	0.00	**11.61**	Exclusive	Las Lomas
3802	Claude R. Goodman & Loraine S. Goodman, Trustees of The Claude R. Goodman and Loraine S. Goodman Family Trust, dated September 25, 2003	Lot 2	1100230325	1.09	1.01	0.08	0.07	**1.08**	Exclusive	Las Lomas
3804	Charles R. Knowles Jr. and Marie L. Knowles, Trustees, or their successors in trust of the Knowles Family Trust D.T.D. 3/9/93	Lot 4	1100230305	30.06	21.88	8.17	7.26	**29.14**	Exclusive	Las Lomas
3807	Paul R. Jacques	Lot 7	1100230365	0.59	0.55	0.04	0.04	**0.59**	Exclusive	Las Lomas
3808	Kathleen Reinhard, Trustee of the Bruder-Reinhard Family Trust-Survivor's "A" Trust	Lot 8	1100230375	13.22	12.00	1.22	1.08	**13.08**	Exclusive	Las Lomas
3901	James E. Pierce	Somis Nursery	1100420115	16.71	7.01	9.70	8.61	**15.62**	Exclusive	Rancho Canada
4101	Miguel Magdaleno, Jr., Trustee of the Magdaleno Living Trust dated April 4, 2002		5000140065	17.16	10.12	7.04	6.25	**16.37**	Exclusive	Thermic
4102	Louis McCutcheon and Anne McCutcheon		5000140095	56.57	29.15	27.42	24.35	**53.50**	Exclusive	Thermic
4103	Romas		5000140015	306.21	128.41	177.80	157.91	**286.32**	Exclusive	Thermic
4201	AMS Craig LLC, a Delaware limited liability company		1100210120	23.11	18.64	4.46	3.96	**22.60**	Hybrid	Zone
4202	Marshall T. Allen and Concepcion V. Allen, as co-trustees of the Marshall T. Allen and Concepcion V. Allen 1990 Revocable Inter Vivos Trust u/d/t dated December 5, 1990		1100170375 1100170385	12.38	12.26	0.12	0.11	**12.37**	Exclusive	Zone
4203	Benjamin C. Vasquez and Leonila C. Vasquez, Trustees of the Vazquez Trust dated July 7, 2021, as community property		1100150040	28.55	15.29	13.26	11.78	**27.07**	Exclusive	Zone

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4205	Mariette L. Menne, Trustee of The Patricia A. Menne Survivor's Trust, created for the benefit of the surviving spouse, under the terms of The David and Patricia Menne Family Trust Dated August 23, 1999, as Amended		1550270035	87.07	87.07	0.00	0.00	**87.07**	Exclusive	Zone
4208	Ehud Ariav Enterprises, Inc.		1100170565	22.00	22.00	0.00	0.00	**22.00**	Exclusive	Zone
4209	Agoure Ranch, LLC		1100200215	64.00	64.00	0.00	0.00	**64.00**	Exclusive	Zone
4210	Fred A Sharl, Ernest R Nichols, Arthur L Nichols, Vincent E Gisler		1100120180	154.98	106.68	48.30	42.90	**149.58**	Exclusive	Zone
4211	Helen Elaine Cavaletto, Trustee of the Cavaletto Survivor's Trust dated December 29, 2013, 403 shares; Richard Cavaletto and Melanie Cavaletto, Trustees of the Cavaletto Trust dated December 29, 2014, 57 shares; Gregory C. Hanger and Christina M. Hanger, Trustees of the Hanger Trust dated March 19, 2009, 57 shares		1100120035	93.15	64.09	29.06	25.81	**89.90**	Exclusive	Zone
4213	Soon Ja Lee, as Trustee of The Lee Family Trust, dated March 19, 1988		1100150065	54.44	35.77	18.67	16.58	**52.35**	Exclusive	Zone
4214	Karen P. Green, a married woman as her sole and separate property, and Cynthia A. Burdullis, an unmarried woman, each as to an undivided 50% interest as tenants-in-common		1100141065 1100141075	76.88	37.31	39.57	35.14	**72.45**	Exclusive	Zone
4215	Marilyn E. Smith, Trustee, Marilyn E. Smith 1997 Revocable Trust dated May 14, 1997		1100141080	18.77	11.74	7.03	6.24	**17.98**	Exclusive	Zone
4216	Price Road Ranch Partners, LLC		1100141100 1100141140	105.97	81.68	24.30	21.58	**103.26**	Exclusive	Zone
4217	Rancho Limonada LLC		1100170330 1100170340 1100170350 1100170405 1100170445 1100170505 1100170525 1100170545	211.86	137.47	74.39	66.07	**203.54**	Exclusive	Zone
4220	Elizabeth Pajka		1100160185 1100160205	14.63	6.13	8.49	7.54	**13.67**	Exclusive	Zone
4221	Urban-D Ranch Limited Partnership		1610050030	23.57	9.89	13.69	12.16	**22.05**	Exclusive	Zone
4225	Terry Noriega, as Trustee of the Noriega Family Trust dated January 26, 1996		1610010180	42.21	32.41	9.80	8.70	**41.11**	Exclusive	Zone
4226	Terry Noriega, as Trustee of the Noriega Family Trust dated January 26, 1996		1610010170	47.76	33.03	14.73	13.08	**46.11**	Exclusive	Zone
4228	AMS Craig LLC, a Delaware limited liability company		1100200255	22.79	21.56	1.23	1.09	**22.65**	Exclusive	Zone
4232	The Lim Family Trust U/D/T 02-01-90, Basilio Y. Lim, Trustee and Rosie C. Lim, Trustee		1100200195	40.05	20.42	19.63	17.43	**37.85**	Exclusive	Zone
4233	Donal N. Ziemer and Ann L. Ziemer, Trustees of the Ziemer Family Trust established November 14, 1980		1560121050	20.02	9.65	10.37	9.21	**18.86**	Exclusive	Zone
4237	DFK Corporation, a California Corporation		1100141045 1100141110	100.82	100.82	0.00	0.00	**100.82**	Exclusive	Zone
4242	George Tash and Debra B. Tash, Trustees of the Community Trust created under the George Tash and Debra B. Tash Intervivos Trust Agreement dated Nov. 25, 1985, fully reinstated May 19, 1999		1100170585	46.57	30.54	16.03	14.24	**44.78**	Exclusive	Zone

LPV Agricultural Allocations Water Year 2023 (03/04/2024)

WMID	Landowner	Ranch / Property Name	Parcels	Allocation Basis (AF)	Base Agricultural Allocation (AF)	Supplemental Agricultural Allocation (AF)	Annual Supplemental Allocation (AF)	Annual Allocation (AF) Water Year 2023	Mutual Water Company Type	Mutual Water Company
4244	Highwood Farms LLC		1100352020	32.57	20.37	12.20	10.84	**31.21**	Exclusive	Zone
4245	James E. Pierce and Janice Pierce, Trustees of the James E. Pierce and Janice Pierce Revocable Trust, established August 15, 2003		1100390045	19.24	19.24	0.00	0.00	**19.24**	Exclusive	Zone
4247	Somis Farm, LLC		1100150050	78.30	45.52	32.79	29.12	**74.64**	Exclusive	Zone
4253	Little Bison Farm LLC		1100170180	90.51	44.09	46.43	41.24	**85.33**	Exclusive	Zone
4257	Eppy Ranch, LLC		1550270055	29.17	23.43	5.74	5.10	**28.53**	Exclusive	Zone
4259	Nancy D. O'Reilly		1100200305	0.99	0.99	0.00	0.00	**0.99**	Exclusive	Zone
4260	Nicandro Luna and Ernestina Luna, husband and wife, as joint tenants		1100240115	1.83	0.92	0.91	0.81	**1.73**	Exclusive	Zone
4261	Paul D. Burns and Lisa A. Burns, Co-trustees of the Paul and Lisa Burns Family Trust		1630010495 1630010815 1630010835	16.46	6.90	9.56	8.49	**15.39**	Exclusive	Zone
4262	Rancho Largo, LLC		1100120155	28.62	28.62	0.00	0.00	**28.62**	Exclusive	Zone
4263	Benjamin Vasquez and Leonila C. Vasquez, husband and wife as joint tenants		1100220040	104.35	66.68	37.67	33.46	**100.14**	Hybrid	Zone
4264	James R. Thiessen, an unmarried man; James R. Thissen, Trustee of the James R. Thiessen Trust dated November 30, 2012		1100180145 1100180165	17.93	16.28	1.64	1.46	**17.74**	Exclusive	Zone
	Total Agricultural Allocations			34,332.69	21,400.98	12,931.69	11,485.17	**32,886.15**		

LPV Domestic Allocations Water Year 2023 (03/04/2024)

WMID	Landowner	Ranch / Property Name	Parcels	Allocation Basis (AF)	Annual Allocation (AF) Water Year 2023	Mutual Water Company Type	Mutual Water Company
4229	Arnold and Sandra Peterson, husband and wife as joint tenants		1100382215	2.03	**1.94**	Exclusive	Zone
1186	Bill Poole		1100230235	1.00	**0.96**	Hybrid	Balcom-Bixby
1177	Butler Ranch Mutual Water Company (Domestic - Conditional)		Exhibit G	24.00	**0.00**	N/A	N/A
3400	Crestview Mutual Water Company (Domestic)		Exhibit E	717.00	**686.48**	N/A	N/A
3536	Del Norte Water Company (Domestic - Conditional)		Exhibit H	25.00	**0.00**	Exclusive	Del Norte
3535	Del Norte Water Company (Domestic)		Exhibit F	48.99	**46.90**	Exclusive	Del Norte
3332	Ehrhardt, Louis and Patricia, pleded to Weyehaeuser Mortgage		1100080090	1.00	**0.96**	Exclusive	Berylwood
1185	Fox Canyon Farms, LLC		1100230285	1.00	**0.96**	N/A	N/A
4239	Frank Keith McCallion and Janell Case		1100240105	1.73	**1.66**	Exclusive	Zone
1182	Hagel, Timothy et al	Meadows of Moorpark	1080161115	1.00	**0.96**	N/A	N/A
1074	Hypericum Land Company LLC; Hypericum Interests LLC (Domestic - Conditional)		Exhibit G	24.00	**0.00**	N/A	N/A
1131	James A. Waters III, Trustee For The J&H Revocable Trust; James A. Waters III, Trustee For The Andrew Exempt Trust	Balcom Canyon Ranch	1080100025	1.08	**1.03**	N/A	N/A
3706	John R. Mathes, Trustee of the Jhn R. Mathis Trust U/T/A Dated August 7, 1992	Lot 8	1100110195	3.44	**3.29**	Exclusive	La Loma Ranch
1183	Julie Rhoads		1100230055	1.05	**1.01**	N/A	N/A
1184	Marlene Valter		1100230045	1.00	**0.96**	N/A	N/A
4258	Michael A. Spahr and Jeanne M. Spahr, Trustees of the Spahr 2000 Family Trust Dated May 10, 2000		1100240225	1.84	**1.76**	Exclusive	Zone
4267	Michael James Kytlica and Vladimir Ian Kytlica		1100240485	1.36	**1.30**	Exclusive	Zone
1107	Mittag Ranches	RC - Domestic Well	1090061260	1.00	**0.96**	N/A	N/A
3308	The Kirstin K. Doss Trust		1100071175	2.69	**2.58**	Exclusive	Berylwood
1187	Waters Family Ranches Oasis - Caldwell Morris K Tr		1100060465	1.00	**0.96**	N/A	N/A
	Total Domestic Allocations			788.21	**754.65**		

Note:

Domestic - Conditional: Conditions set forth in the Judgment for conditional allocation not met, thus conditional allocation not accrued for WY2023

788.21* - Allocation Basis total excludes conditional allocations for WY2023

LPV Commercial Allocations Water Year 2023 (03/04/2024)

WMID	Landowner	Ranch / Property Name	Parcels	Mutual Water Company Shareholder	Mutual Water Company Type	Allocation Basis (AF)	Annual Allocation (AF) Water Year 2023	Mutual Water Company Type	Mutual Water Company
3208	Anderson Trust		1080110120	Yes	Exclusive	5.44	**5.21**	Exclusive	Balcom-Bixby
3805	Catherine Hill, Trustee of the Hill Trust # 2 U/A Dated March 28, 1998	Lot 5	1100230345	Yes	Exclusive	2.79	**2.67**	Exclusive	Las Lomas
1104	City of Moorpark		5060010280 5060010640	No	N/A	96.76	**92.64**	N/A	N/A
1200	City of San Buenaventura			No	N/A	57.86	**55.40**	N/A	N/A
1033	Claridge, Gail, Claridge Family Trust		1100210030 5030030155 5030073025	Yes	Exclusive	13.52	**12.94**	Exclusive	Berylwood
1141	Fox Canyon Farms, LLC		1100230285	Yes	Hybrid	17.84	**17.08**	Hybrid	Balcom-Bixby
3701	George Steve T		1100010165	Yes	Exclusive	5.91	**5.66**	Exclusive	La Loma Ranch
3329	Gerardi, Danny		1100210280	Yes	Exclusive	9.27	**8.88**	Exclusive	Berylwood
1057	Golf Realty Fund, LP	Spanish Hills Country Club	1520242275 1520242305 1520251365 1520252015 1520261035 1520261075 1520261095 1520261105 1520261115 1520261125 1520261135 1520261145 1520261155 1520262075 1520281165 1520283065	No	N/A	201.23	**192.66**	N/A	N/A
3202	Julie Rhoads		1100230055	Yes	Hybrid	10.55	**10.10**	Hybrid	Balcom-Bixby
3325	Marschewski, Thomas A. and Alison Rae Choate Marschewski		1100071145	Yes	Exclusive	7.02	**6.72**	Exclusive	Berylwood
3318	Maskrey, Francis and Joan		1100210240	Yes	Exclusive	25.24	**24.17**	Exclusive	Berylwood
1096	Mesa Union School District		1090050320 1090050340 1090050350 1090050360	Yes	Hybrid	17.00	**16.28**	Hybrid	Del Norte
1130	Saticoy Partners, LLC	Saticoy CC Golf	1090020150 1090020170 1090020285 1090020290 1090311080 1090340040	No	N/A	304.66	**291.69**	N/A	N/A
1137	Saticoy Properties LLC/Grimes Rock Inc * Transfer of this Allocation Basis is limited to 50% of the total.		5000050135 5000090055 5000090260 5000090270 5000090280 5000090290 5000090325 5000090355 5000090365	No	N/A	180.00	**172.34**	N/A	N/A
1147	Sunshine Agriculture, Inc.	Stines Property	1100230355	Yes	Exclusive	1.53	**1.46**	Exclusive	Las Lomas

LPV Commercial Allocations Water Year 2023 (03/04/2024)

WMID	Landowner	Ranch / Property Name	Parcels	Mutual Water Company Shareholder	Mutual Water Company Type	Allocation Basis (AF)	Annual Allocation (AF) Water Year 2023	Mutual Water Company Type	Mutual Water Company
3340	The Azmoun Family Trust 2003		1100071275	Yes	Exclusive	4.96	**4.75**	Exclusive	Berylwood
2011	Ventura County Waterworks District No. 1 - ELPMA		N/A	N/A	N/A	2,661.76	**2,548.44**	N/A	N/A
2191	Ventura County Waterworks District No. 19 - ELPMA		N/A	N/A	N/A	499.71	**478.44**	N/A	N/A
2192	Ventura County Waterworks District No. 19 - WLPMA		N/A	N/A	N/A	1,990.46	**1,905.72**	N/A	N/A
1172	ZIP TWO, LLC		1110010025 1110010035 1110010065 1110010075 1110010095 1110010115 1110010125	No	N/A	326.52	**312.62**	N/A	N/A
	Total Commercial Allocations					6,440.03	**6,165.87**		

LPV Mutual Water Company Allocations (03/04/2024)

WMID	Mutual Water Company	Mutual Water Company Allocation	Annual Allocation (AF) Water Year 2023
3100	Arroyo Las Posas Mutual Water Company	0.00	**0.00**
3200	Balcom-Bixby Water Association Inc., a California corporation	27.02	**24.00**
3300	Berylwood Heights Mutual Water Company	46.43	**41.24**
3500	Del Norte Water Company	40.34	**35.83**
3600	Fuller Falls Mutual Water Company	0.00	**0.00**
3700	La Loma Ranch Mutual Water Company	0.00	**0.00**
3800	Las Lomas Mutual Water Company	0.00	**0.00**
3900	Rancho Canada Water Company LLC	0.00	**0.00**
4100	Thermic Mutual Water Company	0.00	**0.00**
4200	Zone Mutual Water Company	103.84	**92.22**
	Total Mutual Water Company Allocations	217.64	**193.29**

Appendix G
List of Delinquent Assessments

WY2023-1 Basin Assessment Delinquency List, as of 1/15/2025

Row	WMID	Invoice #	Landowner	Amount Due	Basin Interest Charge	Amount Paid	Balance Due
1	1008	LPV-2023-1-000008	Bryce and Elaine Bannatyne Trust, Bryce Bannatyne, Trustee	$ 877.44	$ 87.74	$ -	$ 965.18
2	1009	LPV-2023-1-000009	Bryce and Elaine Bannatyne Trust, Bryce Bannatyne, Trustee	$ 6,558.40	$ 655.84	$ -	$ 7,214.24
3	1094	LPV-2023-1-000088	Mastro Culbert Farms, LLC & Steven Mastro	$ 6,998.08	$ 699.81	$ 6,998.08	$ 699.81
4	1105	LPV-2023-1-000097	Benchmark Partners Ag, LLC	$ 1,328.96	$ 132.90	$ -	$ 1,461.86
5	1119	LPV-2023-1-000109	Mark Ratto, Trustee of the Mark Ratto Revocable Living Trust dated February 2, 2016	$ 2,079.68	$ 207.97	$ -	$ 2,287.65
6	1130	LPV-2023-1-000317	Saticoy Partners, LLC	$ 9,334.08	$ 933.41		$ 10,267.49
7	1182	LPV-2023-1-000293	Hagel, Timothy et al	$ 30.72	$ 3.07	$ -	$ 33.79
8	1184	LPV-2023-1-000298	Marlene Valter	$ 30.72	$ 3.07	$ -	$ 33.79
9	1196	LPV-2023-1-000162	Lynch Land & Cattle, LLC et al.	$ 1,215.68	$ 121.57	$ 1,215.68	$ 121.57
10	3203	LPV-2023-1-000177	Tom & Ruth Millington	$ 143.04	$ 14.30		$ 157.34
			Totals	**$ 28,596.80**	**$ 2,859.68**	**$ 8,213.76**	**$ 23,242.72**

Attachment 5

TAC Member Comments – Draft Basin Optimization Plan

Specific Comments from the Las Posas Valley Basin Technical Advisory Committee
Draft Initial Las Posas Valley Basin Optimization Plan

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment
BB-1	Bryan Bondy	Technical	Overarching Comment	N/A	N/A	N/A	While the BOP appears to meet the letter of the Judgment it does not appear to meet the spirit of the Judgment to "optimize" the basin by seeking to augment the Basin Optimization Yield, and ultimately the Sustainable Yield, to be no less than 40,000 AFY" (Judgment §4.9.1.2) by including "Basin Optimization Projects that are likely to be practical, reasonable, and cost-effective to implement prior to 2040 to maintain the Operating Yield at 40,000 AFY or as close thereto as achievable" (Judgment §5.3.2.1). Given that the Basin Optimization Yield and the Sustainable Yield are controlled by avoiding undesirable results, optimizing the yield would be accomplished by prioritizing the projects that have the greatest likelihood of avoiding undesirable results with the least cost. This means focusing on the two areas of the Basin where modeling has shown that undesirable results are likely under baseline conditions (i.e., eastern WLPMA and northern ELPMA). Prioritization of projects in those areas is necessary to optimize the Basin yield, but is not discussed in the BOP nor is it a consideration in the project scoring methodology. Item 14 of the project scoring methodology could be reworked to instead award more points for projects that address areas where modeling shows that undesirable results are likely under baseline conditions. Alternatively, a 15th criterion could be added. In either case, enough points should be awarded to prioritize projects that address areas where modeling shows that undesirable results are likely under baseline conditions. As an alternative to modifying or adding criteria, the projects could be divided into and presented in two groups within the BOP: (1) projects that address areas where modeling shows that undesirable results are likely under baseline conditions and (2) projects that may increase water supply, but not in areas where modeling shows that undesirable results are likely under baseline conditions (i.e. projects that add water in areas that would not increase the sustainable yield absent another project to move water or pumping).
BB-2	Bryan Bondy	Technical	Clarification	2	1.2, second bullet	*"Improve water quality management of the LPV;"*	This bullet should be preceded by "and/or" because not every project improves water quality management of LPV.
BB-3	Bryan Bondy	Technical	Project No. 1 Water Supply / Yield Augmentation Benefit	Various	Table 1; 2.2.1, 2.2.2.1, 2.2.1.2, 2.2.1.4	*Table 1: Water Supply / Yield Augmentation Up to 2,680 AFY ; Section 2.2.1: "If all of the Arundo within the 324-acre area is removed, this project could result in up to an additional 2,680 AFY of recharge to the ELPMA (VCWSD 2015). This project is anticipated to increase groundwater recharge to the ELPMA and improve the health of riparian habitat along Arroyo Simi-Las Posas." Section 2.2.1.1: "Implementation of this project could increase recharge to the ELPMA by as much as 2,680 AFY (VCWSD 2015)." Section 2.2.1.2: "While this project is not dependent on other unbuilt projects, the full benefits of this project may require implementation of other projects." Section 2.2.1.4: "The increased recharge will directly impact the water levels and groundwater in storage to provide increased flexibility in basin management to maintain groundwater levels above minimum thresholds and at the measurable objectives."*	The First Periodic Evaluation of the LPVB GSP concluded that increased flows in Arroyo-Simi Las Posas above recent (2016-2023 average rates) does not significantly increase the volume of recharge to ELPMA. Therefore, at present, the water supply / yield augmentation benefit of Project No. 1 should be expected to be insignificant if implemented as a standalone project. Achieving the stated water supply / yield augmentation benefit would be fully dependent on implementation of another project(s), such as the Moorpark Desalter. Even then, this project would not address the two areas where modeling shows that undesirable results are likely under baseline conditions (i.e., eastern WLPMA and northern ELPMA) unless coupled with another project to offset pumping in those areas. The cited text, per AF cost, schedule, and project scoring should be revised accordingly.
BB-4	Bryan Bondy	Technical	Project No. 2 Water Supply / Yield Augmentation Benefit	Various	Table 1; 2.2.2.1	*Table 1: Water Supply / Yield Augmentation 1,760 AFY ; Section 2.2.2.1: "In 2019, it was estimated that 1,762 AFY of CMWD water would be available for purchase and delivery to Zone MWC and VCWWD-19.."*	The water supply / yield augmentation value for this project should be based on the amount of in-lieu deliveries necessary to stabilize groundwater levels in eastern WLPMA, which may be less than the 1,760 AFY of available water assumed during GSP development. The minimum amount of in-lieu necessary to avoid minimum threshold exceedances in the WLPMA pumping depression should be estimated via analysis of the relationship between groundwater levels and groundwater extraction rates. The cited text, per AF cost, and project scoring should be revised accordingly based on this initial in-lieu estimate. The in-lieu estimate should then be confirmed with modeling during BOYS development.

Specific Comments from the Las Posas Valley Basin Technical Advisory Committee
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Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment
BB-5	Bryan Bondy	Technical	Project No. 3 Water Supply / Yield Augmentation Benefit	Various	Table 1;2.2.3.2; 2.2.3.4	*"Water Supply / Yield Augmentation Up to 2,000 AFY"; Section 2.2.3.2 "Additionally, while this project is not dependent on other unbuilt projects, the full benefits of this project may require implementation of other project"; Section 2.2.3.4 "Providing additional recharge to the ELPMA will directly impact groundwater levels, which are used to characterize the potential onset of undesirable results associated with the four sustainability indicators applicable to the LPV, by providing additional water supplies to the LPV. The implementation of this project would aid in maintaining groundwater elevations above the minimum thresholds throughout the ELPMA."*	The project location is immediately adjacent to Arroyo Las Posas. Groundwater levels at the project location are the same as the Arroyo Las Posas streambed, indicating there is little, if any, available storage space for the percolated stormwater. Much of the percolated stormwater is anticipated to mound and flow back into the arroyo. Therefore, at present, the water supply / yield augmentation benefit of Project No. 3 is anticipated to be considerably less than 2,000 AFY if implemented as a standalone project. The actual water supply / yield augmentation benefit of Project No. 3 should be estimated via modeling. Achieving the stated benefit is dependent on implementation of other projects, not "may" as indicated in the text. Achieving the stated water supply / yield augmentation benefit would be fully dependent on implementation of another project(s), such as the Moorpark Desalter. Even then, this project would not address the two areas where modeling shows that undesirable results are likely under baseline conditions (i.e., eastern WLPMA and northern ELPMA) unless coupled with another project to offset pumping in those areas. The cited text, per AF cost, schedule, and project scoring should be revised accordingly.
BB-6	Bryan Bondy	Technical	Project No. 4 Water Supply / Yield Augmentation Benefit	Various	Table 1; Section 2.2.4.1	*Table 1: Water Supply / Yield Augmentation Up to 2,200 AFY; Section 2.2.4.1: "Their groundwater flow modeling study suggests that pumping 6,270 AFY for the desalter project would result in an additional 2,200 AFY of recharge to the ELPMA. Based on this, it is estimated that this project would increase the sustainable yield of the ELPMA by 2,200 AFY."*	The water supply / yield augmentation benefit of Project No. 4 is incorrect. Assuming the values of pumping and additional recharge presented in the text are correct, the actual water supply / yield augmentation benefit of Project No. 4 is the difference between project pumping and increased recharge, which is -4,070 AFY (note: the negative sign indicates that, as a standalone project, it would simply increase ELPMA groundwater pumping by 4,070 AFY without an offsetting increase in recharge). However, the 2,200 AFY of increased recharge is based on old information about Simi inflows to the ELPMA, which have declined significantly since. Because Simi inflows have decreased, the amount of increased recharge induced by the project is likely less than 2,200 AFY under present and anticipated future conditions. Thus, the unmitigated groundwater pumping increase would likely be more than 4,070 AFY. While it may be possible to increase pumping by some amount in this part of the Basin without triggering additional undesirable results (that should be quantified with modeling), doing so would not address the two areas of the Basin where modeling shows that undesirable results are likely under baseline conditions (i.e., eastern WLPMA and northern ELPMA) unless coupled with another project to offset pumping in those areas. The cited text, project costs, and project scoring should be revised accordingly.
BB-7	Bryan Bondy	Technical	Project No. 4 Water Supply / Yield Augmentation Benefit	11	Section 2.2.4.4	*"Implementation of this project is anticipated to improve groundwater quality by removing constituents of concern from the southern portion of the ELPMA, which has been impacted by degraded water quality resulting from surface water recharge originating from outside the LPV boundaries. The project aims to achieve these goals by pumping and treating high-TDS groundwater from southern portion of the ELPMA. In doing this, the project would: (1) reduce the dependence on imported water in the LPV by providing new local potable supplies, (2) improve groundwater quality in the southern portion of the ELPMA, and (3) create additional underground storage within the ELPMA"*	It is unclear how the project will improve insitu groundwater quality if the source of poor quality water (recharge of inflows from Simi Valley and percolated treated wastewater at the Moorpark Water Reclamation Facility) continues. The water quality benefits should be clarified and/or caveated.
BB-8	Bryan Bondy	Editorial	Clarification	11	Section 2.2.4.4	*"Providing additional recharge to the ELPMA will directly impact groundwater levels..."*	This text is misleading as it implies the project will improve groundwater levels. As discussed in comment BB-6, the net effect of Project No. 4 will be a minimum 4,070 AFY increase in unmitigated pumping demand on the ELPMA, which will cause groundwater level declines. The text should be revised.

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Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment
BB-9	Bryan Bondy	Clarification	Project No. 5 Water Supply / Yield Augmentation Benefit	Various	Table 1; Section 2.2.5.1	*Table 1: "Water Supply / Yield Augmentation Up to 4,700 AFY"; Section 2.2.5.1 "this project could increase the sustainable yield of the ELPMA by as much as 2,000 AFY"*	Conflicting values of water supply / yield augmentation are provided in the cited portions of the document. These should be reconciled.
BB-10	Bryan Bondy	Technical	Project No. 5 Water Supply / Yield Augmentation Benefit	Various	Table 1; Section 2.2.5; and Section 2.2.5.1	*Section 2.2.5.1 "this project could increase the sustainable yield of the ELPMA by as much as 2,000 AFY"*	Project No. 5 will not increase the sustainable yield of ELPMA. Rather, Project No. 5 will maintain existing recharge sources that are already accounted for in the sustainable yield. This should be made clear in the document.
BB-11	Bryan Bondy	Technical	Project No. 5 Water Supply / Yield Augmentation Benefit	12	Section 2.2.5.2	*Additionally, the full benefits of this project may require implementation of other projects, like the Moorpark Desalter (Project No. 4), which lowers groundwater elevations in the Shallow Alluvial Aquifer, and the Arundo Removal Project (Project No. 1), which reduces evapotranspiration losses upstream of the LPV.*	As mentioned in Comment No. BB-3, the First Periodic Evaluation of the LPVB GSP concluded that increased flows in Arroyo-Simi Las Posas above recent (2016-2023 average rates) does not significantly increase the volume of recharge to ELPMA. Therefore, even if Project No. 5 is coupled another project that lowers groundwater elevations in the Shallow Alluvial Aquifer, there is no additional discharge volume from Simi Valley to recharge in ELPMA (i.e., all of the available discharge is already percolating into the basin).
BB-12	Bryan Bondy	Technical	Project No. 5 Other Benefits	13	Section 2.2.5.4	*"Additionally, this project would maintain native habitat and provide flood control benefit."*	The habitat along the Arroyo Las Posas is not native. The habitat was recruited by and is maintained by discharges of non-native water (i.e., wastewater plants and dewatering wells). Air photos show that the "native habitat" before discharges on non-native water was a dry, sandy wash. It is unclear how maintaining flows in the arroyo provides a flood control benefit.
BB-13	Bryan Bondy	Technical	Project No. 5 Other Benefits	13	Section 2.2.5.4	*"Consequently, the water quality of the surface water flows will have to be investigated further and addressed through project implementation."*	It is unclear what is meant here. Please elaborate and consider tying in with the Salts TMDL.
BB-14	Bryan Bondy	Technical	Project No. 6 Water Supply / Yield Augmentation Benefit	Various	Table 1; Section 2.2.6.1	*Table 1: "Water Supply / Yield Augmentation Up to 3,000 AFY"; Section 2.2.6.1 "In 2017, the City indicated that approximately 3,000 AFY of recycled water would be available for delivery to Berylwood Heights MWC and Zone MWC."*	The water supply / yield augmentation benefit of Project No. 6 is incorrect because diverting 3,000 AFY of recycled water from Simi Valley for pipeline delivery would reduce the amount water that percolates into ELPMA along the arroyo. The actual water supply benefit of Project No. 6 is equal to the amount of avoided evapotranspiration losses along the arroyo. The sustainable yield increase would depend on where the water is delivered, with maximal benefit for delivery to one or both areas of the Basin where modeling shows that undesirable results are likely under baseline conditions (i.e., eastern WLPMA and northern ELPMA) and minimal benefit elsewhere. The cited text, per AF costs, and project scoring should be revised accordingly.
BB-15	Bryan Bondy	Technical	Project No. 6 Cost per AF	15	Section 2.2.6.4	*"This does not include the cost to purchase and/or lease water from the City."*	It is unclear why the purchase cost is omitted. An estimate could easily be obtained by asking Simi Valley for the current recycled water purchase agreement.
BB-16	Bryan Bondy	Technical	Project No. 7	15-16	Section 2.7	Entire section	It is unclear why a feasibility study is needed. This project is the same as Project No. 2, just in a different part of Basin. Existing infrastructure is capable of delivering imported water from Calleguas in-lieu to offset VCWWD-1 groundwater pumping and/or agricultural pumpers who have an agricultural meter through VCWWD-1. In-lieu delivery of water has been performed previously in this area under FCGMA rules, so it is known to be feasible. This section should be converted from a feasibility study to a project. The water supply / yield augmentation value for this project should be based on the minimum amount of in-lieu deliveries necessary to stabilize groundwater levels in northern ELPMA, which should be estimated via analysis of the relationship between historical groundwater levels and groundwater extraction and injection rates in the area. This would allow for a per AF cost and updated project scoring . The in-lieu estimate should then be confirmed with modeling during BOYS development.
BB-17	Bryan Bondy	Technical	Project No. 10 Costs	21	2.2.10.3	*"The cost is anticipated to be approximately $140,000 for eleven well locations"*	The project cost is likely underestimated. Installation of sounding tubes in just a few wells that require pump removal and reinstallation could easily cost more than $140,000.
BB-18	Bryan Bondy	Technical	Project Prioritization	22-23	2.3	N/A	Please revise based on earlier comments.

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BB-19	Bryan Bondy	Technical	Project Prioritization - Project No. 7	22-23	2.3	N/A	Per comment BB-16, this project should be moved from Section 2.3.2 and Table 3 to Section 2.3.1 and Table 2.
BB-20	Bryan Bondy	Consistency with Judgment	Applicability of Data Gap Projects to BOP	2	1.2, third bullet	*"Address data gaps identified in the GSP and 2025 Periodic Evaluation of the LPV GSP."*	Should projects to address data gaps be included in the BOP? Projects to address data gaps are not projects that "are likely to be practical, reasonable, and cost-effective to implement prior to 2040 to maintain the Operating Yield at 40,000 AFY or as close thereto as achievable" (Judgment §5.3.2.2).
BB-21	Bryan Bondy	Editorial	Clarification	1	1.1, footnote no. 1		Because footnote no. 1 is the Judgement definition of the term Operating Yield (Judgment Section 1.73), greater clarity could be achieved by placing the footnote immediately following "Operating Yield" instead of the end of the sentence. Doing so would clarify that the footnote applies to the term "Operating Yield" not the quantity 40,000 AFY.
BB-22	Bryan Bondy	Editorial	Judgment Reference	1	1.1, bullet list		Regarding the bullet list, it would be helpful to reference the source Judgment section following each bullet (e.g., add "(Judgment §5.3.2.1)" after the first bullet, etc.).
BB-23	Bryan Bondy	Editorial	Project No. 1 Costs	6	2.2.1.3	*"...capital cost estimate for Phase II of $9,100,00"*	A zero is missing.
BB-24	Bryan Bondy	Editorial	Incomplete Sentence	11	Section 2.2.4.4	*"Depending on the operational conditions and distribution of desalted water, this project."*	Incomplete sentence.
BB-25	Bryan Bondy	Editorial	Pagination	N/A	N/A	N/A	Page numbers reset to 1 after page 2.
BB-26	Bryan Bondy	Clarification	Project Schedules	N/A	Appendix C	N/A	Consider a fourth color to more clearly distinguish between feasibility studies and project implementation or construction.
BB-27		Clarification	Project Schedules	N/A	Appendix C	N/A	Some projects show no operation and maintenance phase after construction. Is that an error?
BB-28	Bryan Bondy	Clarification	Project Schedules	N/A	Appendix C	N/A	Project No. 4 schedule seems aggressive.
BB-29	Bryan Bondy	Clarification	Project Schedules	N/A	Appendix C	N/A	Project No. 7 has no "Agency Activities" phase and would only be operated for one year (2027). This seems incorrect.
BB-30	Bryan Bondy	Editorial	Spelling	N/A	Appendix C & D	*"Phase II: Well Construction"*	Spelling "Construction"
BB-31	Bryan Bondy	Editorial	Executive Summary	N/A	N/A	N/A	Consider adding an executive summary.
BB-32	Bryan Bondy	Editorial	Project Dependencies Graphic	N/A	N/A	N/A	Consider adding a graphic that visually communicates project interdependencies.

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BA-1	Bob Abrams	Editorial		3	2.1	*e.g., 2.1.2 'Timing and feasibility e.g., "4. Project complexity (maximum of 5 points)" ""*	Although the scoring is self-explanatory in most cases, in the interests of clarity, the scoring could be made clearer in this summary for all numbered components. Or make the point in each subsection 2.1.1, 2.1.2, etc., that scoring is explained in detail in Appendix A. Reader hasn't read Appendix A by this stage.
BA-2	Bob Abrams	Technical		5	2.2.1.2	*"While this project is not dependent on other unbuilt projects, the full benefits of this project may require implementation of other projects, like the Moorpark Desalter (Project No. 4), that lower groundwater elevations in the Shallow Alluvial Aquifer to increase available storage in the ELPMA and limit discharge of the increased arroyo flows downstream into the Pleasant Valley Basin."*	This is one of the three projects recommended for inclusion in the BOYS. If its full benefits may not be realized without implementing Project 4, then Project 4 should elevated to a higher priority and included in the BOYS. Otherwise, it will not be known how much water this project might provide, which could lead to issues maintaining the 2040 the Operating Yield.
BA-3	Bob Abrams	Editorial		6	2.2.1.3	*"capital cost estimate for Phase II of $9,100,00"*	Commas in wrong place or missing a zero
BA-4	Bob Abrams	Technical		9	2.2.3.2	*"Additionally, while this project is not dependent on other unbuilt projects, the full benefits of this project may require implementation of other projects, like the Moorpark Desalter (Project No. 4), that lower groundwater elevations in the Shallow Alluvial Aquifer to provide adequate available storage to realize the full benefits of recharge to the ELPMA."*	While not one of the projects recommended for inclusion in the BOYS, its full benefits may not be realized without implementing Project 4. Thus, Project 4 should elevated to a higher priority and included in the BOYS. Otherwise, it will not be known how much water this project might provide, which could lead to issues maintaining the 2040 the Operating Yield.
BA-5	Bob Abrams	Editorial		11	2.2.4.4	*"(2) improve groundwater quality in the southern portion of the ELPMA, and (3) create additional underground storage within the ELPMA"*	Missing a period at the end of the sentence.
BA-6	Bob Abrams	Editorial		11	2.2.4.4	*"Depending on the operational conditions and distribution of desalted water, this project."*	Should there be some text that follows the last word of the sentence?
BA-7	Bob Abrams	General Technical		11	2.2.4.4	*"Additional Project Considerations"*	As noted for Projects 1, 3, and 5, The Moorpark Desalter may be a critical project for the success of other project. Thus, it should be given a higher priority and included in the BOYS.
BA-8	Bob Abrams	Editorial		12	2.2.5.1	*"The 2025 Periodic Evaluation of the GSP evaluated the benefits of maintaining SVWQCP discharges"*	2025?
BA-9	Bob Abrams	Technical		12	2.2.5.2	*"Additionally, the full benefits of this project may require implementation of other projects, like the Moorpark Desalter (Project No. 4), which lowers groundwater elevations in the Shallow Alluvial Aquifer, and the Arundo Removal Project (Project No. 1), which reduces evapotranspiration losses upstream of the LPV.*	This is one of the three projects recommended for inclusion in the BOYS. If its full benefits may not be realized without implementing Project 4, then Project 4 should elevated to a higher priority and included in the BOYS. Otherwise, it will not be known how much water this project might provide, which could lead to issues maintaining the 2040 the Operating Yield.
BA-10	Bob Abrams	General Technical		17	2.2.7.4		No text associated with this sub-heading? This sub-heading not included in previous or future sections? Describe Benefits of In Lieu Deliveries to Northern East Las Posas? Or delete? Benefits are described in the "Additional Project Considerations" subheading in previous and future Sections. But Tables 2 and 4 then have heading "Benefits relative to SGM". No preference, but need to be clear and consistent.
BA-11	Bob Abrams	Technical		17	2.2.8.1	*"The study will not provide a new water supply or directly increase the yield of the LPV."*	If rights are purchased/surrendered then there will be reduced groundwater production, so more water will remain in the ground? Or am I missing something?
BA-12	Bob Abrams	General Technical		18	2.2.8.4		No text associated with this sub-heading? Describe Benefits of eveloping a Least Cost Acquisition Program? Or delete?
BA-13	Bob Abrams	Technical		19	2.2.9	*"In addition, the GSP notes that there are limited dedicated monitoring wells screened in the Grimes Canyon aquifer in the ELPMA"*	Not just ELPMA. WLPMA too? Data are particularly sparse in WLPMA - e.g., wells not screened in GCA (or not monitored)

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BA-14	Bob Abrams	Technical		20	2.2.9.3	*"Because this project will not increase water supplies within the LPV, FCGMA has assigned the total water costs to implement this project a value of ">$3,000 per AF"."*	The costs to LPVB could be much higher if there are insufficient data in certain areas and aquifers and permanent undesirable results occur without anyone's knowledge. Suggest this analysis is reconsidered.
BA-15	Bob Abrams	Technical		22	Table 2	*Projects that are "Recommended for Inclusion in the BOY"*	Given BA-2, BA-4, BA-7, and BA-9, the Moorpark Desalter (Project 4) should be included in the BOYS.
BA-16	Bob Abrams			23	Table 3	*Scores for Project 4*	Given BA-2, BA-4, BA-7, and BA-9, the Moorpark Desalter (Project 4) should be included in the BOYS.
BA-17	Bob Abrams	Technical		23	Table 3	*Scores for Project 8*	See BA-7. Suggest either "Water Supply Benefit" (reduction in demand?) or "Benefits relative to SGM" (benefit to 3 or more indicators?) scores revisited. Depending on lifetime of acquisition I would like to see this project in the BOY
BA-18	Bob Abrams	Technical		23	Table 3	*Scores for Project 9*	Cost score 3? See above BA-10 - Monitoring wells are relatively cheap and the costs to LPVB could be much higher if there are insufficient data in certain areas and aquifers that leads to permanent undesirable results occur without anyone's knowledge. Suggest this score is reconsidered (undesirable result costs avoided?). "Benefits relative to SGM" score 5 for groundwater monitoring well data. Without data, SGM cannot be demonstrated? Suggest this score is reconsidered (benefit to 3 or more indicators?). I would like to see this project in the BOY
BA-19	Bob Abrams	Technical		B-1	Project 8	*Reduced Demand <500 AFY*	Is this realistic? Could it be a lot more? What is it based on?
BA-20	Bob Abrams	Technical		B-2	Project 8	*Project Lifespan <5 years*	Surely if the water right has been purchased, that is in perpetuity? >20 years?
BA-21	Bob Abrams	Technical		B-2	Project 9	*Development Phase Conceptual - no feasibility or design, project not well defined*	The approximate location and depth for new wells already known? Well specification easily defined.
BA-22	Bob Abrams	Technical		B-3	Project 8	*Impacts on Sustainability Indicators 10*	Could be 20 if demand reduced?
BA-23	Bob Abrams	Technical		B-3	Project 9	*Water cost >$3000/AF*	I suggest the cost of damage avoided or avoiding water resource potentially lost offsets this, so the data are more valuable <$500/AF?
BA-24	Bob Abrams	Technical		B-3	Project 9	*Impacts on Sustainability Indicators 10*	Could be 20 if it demonstrates SGM?
BA-25	Bob Abrams	Technical		B-11	Project 8	*Project Lifespan <5 years*	Surely if the water right has been purchased, that is in perpetuity? >20 years?
BA-26	Bob Abrams	Technical		B-11	Project 8	*Additional benefits, Indicators' - mitigate one*	Could be 20 if demand reduced?
BA-27	Bob Abrams	Technical		B-12	Project 9	*Conceptual' - no feasibility or design, project not well defined*	The approximate location and depth for new wells already known? Well specification easily defined.
BA-28	Bob Abrams	Technical		B-12	Project 9	*Water Cost,' >$3000/AF*	I suggest the cost of damage avoided or avoiding water potentially lost offsets this, so the data are more valuable <$500/AF?
BA-29	Bob Abrams	Technical			Appendix C		This assumes all projects will be done. This will need sufficient resourcing – does FCGMA have this ready? Is it a schedule that just shows it could be done, or is it a proposed schedule that FCGMA would follow?
BA-30	Bob Abrams	Technical			Appendix C		Why does Phase I: Work Plan Development for Project 1 Arundo removal take 23 months?
BA-31	Bob Abrams	Technical			Appendix C		Why is Project 7 In Lieu Deliveries to Northern ELPMA not looked at until 2027?
BA-32	Bob Abrams	Technical		D-2 and D-3	Project 9		Is the cost $550,000 for six quarters correct - $3.3M? So six new wells? Not explicit in Section 2.2.9. Seems expensive
BA-33	Bob Abrams	Technical					I note for the record that only two of the nine proposed projects discuss the West Las Posas Management Area (WLPMA).

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TM-1	TMorgan	General Editorial	plan scope	NA	NA	*NA*	The document reads like a list of projects rather than a plan. Document does not say WHAT is going to be done. What modeling will be done? Have scenarios been developed to model? How will out-of-basin impacts be addressed? Can a project flow chart be included to show the sequencing of steps envisioned for the plan? Which projects will be modeled? If the goal is get Operational Yield to 40,000 AFY, what quantity of water is needed to be developed via new sources, demand reduction, new projects, or ??
TM-2	TMorgan	General Editorial	plan scope	NA	NA	*NA*	How do the prioritized projects address the GW problems in each basin? Same for the "Feasibilty Study" group of projects. The link between solving basin issues and these projects is not clearly laid out. Maybe a matrix showing which projects address each problem would focus this discussion.
TM-3	TMorgan	General Technical	plan scope	NA	NA	*NA*	Expected to see a discussion of how this plan would go about identifying possible funding mechanisms for all of the projects. Reader is left wondering how these projects would be paid for. Who would be responsible for the study and implementation costs.
TM-4	TMorgan	Technical	project benefits	NA	NA	*NA*	Are the projects dependent on the Moorpark Desalter to create more storage space in the shallow aquifer actually competing for the same storage space? Until the desalter project is modeled and the amount of storage space is reasonably estimated, we don't know if multiple projects with the same benefit (i.e., creation of surface water flows that can be captured by the storage space) are actually viable.
TM-5	TMorgan	Editorial	language clarification	2	2.1.2	*...uncertainty of the project...*	Clarify what uncertainty is being referenced. Is it project feasibility, benefit(s) to basin, or ? Feels like words are missing from sentence.
TM-6	TMorgan	Editorial	language clarification	3	2.1.3	*9. Funding match for project construction...*	A more precise wording would be "Is the project proponent willing to provide a funding match". This change makes the language more consistent with Appendix A Ranking Sheets.
TM-7	TMorgan	Editorial	language clarification	3	2.1.3	*10. Funding match for O&M*	A more precise wording would be "Is there a source other than FCGMA for ongoing operations and maintenance cost". Why not match the ranking sheet language? .
TM-8	TMorgan	Technical	language clarification	5	2.2.1.2	*...the full benefits of this project may require implementation of other projects, like the Moorpark Desalter (Project No. 4), that lower groundwater elevations in the Shallow Alluvial Aquifer to increase available storage in the ELPMA and limit discharge of the increased arroyo flows downstream...*	The interdependencies between projects are not emphaszed adequately in the document. The benefits of this project are not fully realized unless the Moorpark Desalter project is implemented, but the desalter project is not among the prioritized projects and is not proposed for inclusion in the BOYS (Table 3). Does this mean that Arundo removal should be contingent on the desalter project? How would the modeling be performed to show the benefits of the Arundo removal without also including the desalter project?
TM-9	TMorgan	Technical	project costs	5	2.2.1.3	*...an O&M cost of $250 per acre-foot (AF) of water. ...the total cost to implement this project is estimated to be approximately $390 per AF.*	Based on the values presented in this section and Appendix D, Phase I Planning cost is $400,000, Phase II Arundo removal (CAPEX) is $9,100,000 with Phase III (?) (OPEX) at $670,000/qtr ($2,680,000/yr). Total project cost is $400K+$9,100K+(25yrs at $2,680K/yr)=$76,500K or ~$1,142/AF ($76,500K/(25yrs*2,680AF/yr)) as a long-term 25 yr average).
TM-10	TMorgan	Technical	project costs	5	2.2.1.3	*...an O&M cost of $250 per acre-foot (AF) of water.*	This value presumably comes from 2,680AFY*$250/AF=$670,000/yr. Appendix D indicates that the O&M costs are $670,000/qtr (which is $2,680,000/yr) or $1,000/AF.
TM-11	TMorgan	Technical	language clarification	6	2.2.1.4	*...increased flexibility in basin management to maintain groundwater levels above minimum thresholds and at the measurable objectives.*	This sentence implies that GW levels are currently above the MTs and are actually at the MOs without the project. Is this project needed to achieve MTs and MOs in ELPMA?
TM-12	TMorgan	Technical	project description	20	2.2.10	*...installation of transducers in representative monitoring points, or key wells,...*	How does this project fit into the optimization goal of achieving and maintaining the Operational Yield at 40,000 AFY? The project obviously has benefits to refining our understanding of the basin hydrogeology, but this plan is focussed on the 40,000 AFY Operational Yield. What is the connection between more WL data and achieving and maintaining the desired yield?

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TM-13	TMorgan	Technical	project costs	21	2.2.10.3	*…cost is anticipated to be approximately $140,000 for eleven well locations…*	The $140K cost is just the CAPEX. Transducer networks require ongoing maintenance, field verification, instrumental drift evaluations, periodic equipment replacement, and analyses of the newly acquired data. These OPEX expenses should be a part of the cost evaluation.
TM-14	TMorgan	Technical	project costs	7	2.2.2.3	*…by funding the difference between the cost of CMWD and the cost of pumping.*	Is part of the incentivization program to allow Zone MWC and VCWWD-19 to carry over their unused GW allocation? OR is that allocation forfeited ? This section does not discuss how the project would be funded except in general terms (i.e., incentivization). Expected this section to indicate that an "incentivization plan" would be developed by end of 2025 (for example).
TM-15	TMorgan	Technical	project costs	7	2.2.2.3	*…CMWD's 2024 Tier 1 water rate is $1,730 per AF.*	It would be appropriate to include a brief acknowledgement that the Tier 1 rates are expected to increase in the future. Consequently, the per AF costs for this project will increase by a yet to be determined amount in the future.
TM-16	TMorgan	Editorial	recognition of stakeholder input	8	2.2.2.4	*…coordination between FCGMA, CMWD, VCWWD-19, and Zone MWC.*	add "and basin stakeholders" to this list.
TM-17	TMorgan	Technical	Undesirable Results	8	2.2.2.4	*Implementation of this project is not anticipated to cause Undesirable Results…*	The project is not expected to cause Undesirable Results, but is it expected to mitigate a Significant and Unreasonable Impact(s)?
TM-18	TMorgan	Technical	downstream impacts	8	2.2.3.1	*…this project could provide up to 2,000 AFY of diversions to their percolation ponds…*	Has the impact of the loss of 2,000 AFY of water to the Pleasant Valley basin been evaluated? How will this be handled during the modeling effort since use of the OPV model is not a part of this study plan?
TM-19	TMorgan	General Editorial	project timing	8	2.2.3.2	*…construction of the diversion facilities could be completed in a single phase by June 30, 2027.*	This is a very aggressive project schedule considering permitting and CEQA/NEPA has not yet been started. Appendix D shows construction extending through Q3 2027.
TM-20	TMorgan	Technical	language clarification	9	2.2.3.2	*…the full benefits of this project may require implementation of other projects, like the Moorpark Desalter (Project No. 4), that lower groundwater elevations in the Shallow Alluvial Aquifer to provide adequate available storage to realize the full benefits of recharge to the ELPMA.*	The interdependencies between projects are not emphaszed adequately in the document. The benefits of this project are not fully realized unless the Moorpark Desalter project is implemented, but the desalter project is not among the prioritized projects and is not proposed for inclusion in the BOYS (Table 3). Does this mean that stormwater capture should be contingent on the desalter project? How would the modeling be performed to show the benefits of the stormwater capture without also including the desalter project?
TM-21	TMorgan	Technical	project costs	9	2.2.3.3	*No outside sources of funding to construct this project have been identified.*	Is the implication that VCWWD-1 will bear the full costs of this $4,000,000 (CAPEX) project? The funding element is not discussed. Will pumpers in the basin be expected to cover the CAPEX and OPEX costs since no outside funding sources have been identified?
TM-22	TMorgan	Technical	collaboration required	9	2.2.3.4	*…this project will require coordination between FCGMA and VCWWD-1.*	Coordination/collaboration needed from CDFW, RWQCB, and ACOE. Suggest adding these agencies to the sentence.
TM-23	TMorgan	Technical	possible interbasin impacts	9	2.2.3.4	*Implementation of this project is not anticipated to cause Undesirable Results…*	What is the impact to Pleasant Valley basin? Might this loss of water be perceived as a triggering event for Undesirable Result(s)? How will this be evaluated in the BOYS?
TM-24	TMorgan	Technical	language clarification	9	2.2.3.4	*…this project would aid in maintaining groundwater elevations above the minimum thresholds throughout the ELPMA.*	This sentence implies that GW levels are currently above the MTs without the project. Is this project needed to achieve MTs in ELPMA?
TM-25	TMorgan	Technical	project water balance	10	2.2.4	*…groundwater flow modeling study suggests that pumping 6,270 AFY for the desalter project would result in an additional 2,200 AFY of recharge to the ELPMA.*	2,200AFY of enhanced surface water recharge is partiallly offset by the exported brine ~1,568AFY (assumed 25% of 6,270AFY) = 632AFY. The net benefit appears to be much less that 2,200 AFY of additional recharge.
TM-26	TMorgan	Technical	project benefits	10	2.2.4.1	*… it is estimated that this project would increase the sustainable yield of the ELPMA by 2,200 AFY.*	This is not clear to the reader. Pumping 6,270 AFY equates to an increase in the sustainable yield by 2,200 AFY?
TM-27	TMorgan	Technical	project assumption	10	2.2.4.2	*"This project is not dependent on other unbuilt projects or projects that are currently under construction."*	The SMP does not extend to desalter location. This project is dependent on an SMP extension to the desalter location (or some other brine disposal option).
TM-28	TMorgan	Technical	project assumption	10	2.2.4.2	*VCWWD-1 has not completed a feasibility study for this project.*	This language is not consistent with 2.2.4 and 2.2.4.1 that references preliminary GW modeling and preliminary analyses…have been completed…

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TM-29	TMorgan	Technical	project costs	11	2.2.4.3	*No outside sources of funding to construct this project have been identified.*	Is the project proponent suggesting it bear the full costs of this $40,000,000 (CAPEX) project? The funding element is not discussed. Will pumpers in the basin be expected to cover the CAPEX and OPEX costs since no outside funding sources have been identified?
TM-30	TMorgan	General Editorial	incomplete sentence	11	2.2.4.4	*...distribution of desalted water, this project.*	incompete sentence...missing words after "...this project."
TM-31	TMorgan	Technical	project benefits	12	2.2.5.1	*...implementation of this project could increase the sustainable yield of the ELPMA by as much as 2,000 AFY.*	How does securing this water flow into the future increase the sustainable yield? This flow is happening now, so this input was used to calculate the current sustainable yield. Isn't the idea behind this project to secure this water source into the future?
TM-32	TMorgan	Technical	project premise	13	2.2.5.4	*...perennial surface water flow in Arroyo Simi-Las Posas is also thought to be the primary source of high TDS concentrations observed in the groundwater in the southern ELPMA (FCGMA 2019). Consequently, the water quality of the surface water flows will have to be investigated further and addressed through project implementation.*	This statement says that we don't know if the water quality of the surface water flows would actually support the project contentions that high TDS GW originated from the surface water AND it is "unknown" if the future water quality would be sufficiently better that the GW quality would improve enough to justify the project costs. Feels like the basic premise of the project is suspect if the water quality must be studied further and possibly addressed by adaptive management.
TM-33	TMorgan	Technical	project benefits	13	2.2.5.4	*...and provide flood control benefit.*	This is the first mention of flood control benefits. How does this benefit fit into the optimization goal of achieving and maintaining the Operational Yield at 40,000 AFY?
TM-34	TMorgan	Technical	project impacts	14	2.2.6.1	*...the City indicated that approximately 3,000 AFY of recycled water would be available...*	What is the impact to the Simi Valley basin of exporting 3,000 AFY of recycled water? How will this plan evaluate this potential impact? This is an in-lieu project...substituting imported recycled water for GW extractions.
TM-35	TMorgan	Technical	project impacts	14	2.2.6.2	*Project benefits.*	Suggest saying "Project benefits and impacts"
TM-36	TMorgan	Technical	project costs	15	2.2.6.3	*...does not include any costs required to construct, operate, and maintain local desalters to treat the recycled water...*	Suggest adding text to acknowledge that these costs do not include the costs of brine disposal from the desalters which could include a brine pumping station and conveyance pipeline. Is the brine envisioned to be disposed of in the SMP? If the SMP is the disposal mechanism, then the costs do not include the connection fees (and construction costs to make the connection) or the ongoing unit disposal costs. The costs for this project are much greater than $700/AF.
TM-37	TMorgan	General Technical	agency collaboration	15	2.2.6.4	*...will require coordination between FCGMA, the City, and Las Posas Valley Users*	Suggest adding RWQCB to the list.
TM-38	TMorgan	Technical	project impacts	15	2.2.6.4	*...water level recovery benefits would be quantified through numerical modeling conducted in the Phase I Feasibility Study.*	Section 2.2.6.2 does not include GW modeling in the Phase I Feasibility activities. What GW model would be used to assess the impact to Simi Valley basin of this water export to the LPV basin?
TM-39	TMorgan	Technical	project description	15	2.2.7	*...evaluate the feasibility of providing supplemental water supplies...*	It would be helpful to the reader to know the potential source(s) of supplemental water that are proposed to be evaluated. This information could also be included in Section 2.2.7.1.
TM-40	TMorgan	Editorial	grammar / editorial	16	2.2.7.1	*...willing to use...*	willingness to use
TM-41	TMorgan	Technical	project concept	16	2.2.7.1	*...will not provide a new source of water supply to the LPV...*	Reader is left wondering what this project does... if it doesn't supply new water to the area, is it a demand reduction project? Section 2.2.7 indicated "Supplemental water supplies to this area will reduce groundwater demand in this part of the ELPMA."
TM-42	TMorgan	Editorial	document organization	17	2.2.7.4		No text is provided under this heading. If there are no benefits, suggest making that statement.
TM-43	TMorgan	Technical	project description	17	2.2.7.5	*...identify entities that are able to receive and deliver supplemental water...*	Suggest including the potential supplies of the supplemental water in this sentence. ...identify entities that are able supply or receive and deliver supplemental water...
TM-44	TMorgan	Editorial	document organization	18	2.2.8.4		No text is provided under this heading. If there are no benefits, suggest making that statement.
TM-45	TMorgan	Technical	entity collaboration	18	2.2.8.5	*...will require coordination between FCGMA and the PAC and TAC...*	Add "basin stakeholders" to this sentence.
TM-46	TMorgan	Technical	project costs	22	2.3.1	*...sufficiently defined to implement without additional feasibility studies to define project scopes, costs, and benefits.*	Many of the projects do not have defined costs for both CAPEX and OPEX. OPEX, for several projects, is poorly assessed or not assessed at all. The interdependencies of some projects with others (to achieve the stated anticipated benefits) means that the actual costs for some projects are not stand alone values and should be viewed in conjunction with the interdependent project costs.

Specific Comments from the Las Posas Valley Basin Technical Advisory Committee
Draft Initial Las Posas Valley Basin Optimization Plan

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment
TM-47	TMorgan	Technical	project costs	24	4	*...the total estimated project cost...*	The total estimated project costs have yet to be determined, in particular the OPEX costs. It would be more accurate to identify the project costs as partial, interim cost estimates.
TM-48	TMorgan	Editorial	document organization	B-2	Appendix B	*NA*	The Timing/Feasibility matrix has many cells where the words are cutoff (the text is not scaled to the cell size).
TM-49	TMorgan	Editorial	document organization	B-3	Appendix B	*NA*	As mentioned previously, the Water Cost values (under Cost & Funding) are likely underestimated. The uncertainty of these costs is not discussed in the ranking scheme section. The uncertainty (and TBD costs) could impact the ranking of some of the projects. How can this uncertainty be addressed in the plan?
TM-50	TMorgan	Editorial	document organization	D-1	Appendix D	*Phase II: Well Construstion*	typo under Project 9 - Construction. This continues across each matrix in this Appendix.
TM-51	TMorgan	Editorial	document organization	D-1	Appendix D	*NA*	the Notes have odd fonts - readable, but odd
TM-52	TMorgan	Editorial	document organization	D-2 through D-6	Appendix D	*NA*	the Notes text is truncated
TM-53	TMorgan	Technical	document organization	D-6	Appendix D	*NA*	It would be more helpful to the reader if the Total Project Costs column supplemented with CAPEX, OPEX, and WM administrative cost columns. For many projects, the OPEX is not known and having a "TBD" shown in the table makes it clear to the stakeholders that these project costs should be considered minimums. The WM administrative costs could be estimated as a generic 20% of the CAPEX (e.g., with an upper limit of ~$200K) plus 20% of the OPEX costs. It is understood that these are placeholder costs, but is a more complete representation of the types (and general orders of magnitude) of the overall project costs.

Specific Comments from the Las Posas Valley Basin Technical Advisory Committee
Draft Initial Las Posas Valley Basin Optimization Plan

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment
CT-1	Chad Taylor	General Technical	Add cost per unit water to each text Cost and Funding subsection	NA	NA	*NA*	Consider presenting costs per acre-foot of water supply for each project in the text for comparison to the project ranking sheets in Appendix B.
CT-2	Chad Taylor	General Editorial	Adjust cell sizes in Appendix B tables so all text is visible	B-2 & B-7	Appendix B	*NA*	The text in some Appendix B tables is not visible in the pdf that was provided because the cell sizes in the table are too small to show all of the text. Please adjust so all text is visible and legible.
CT-3	Chad Taylor	Editorial	Project 1 Phase II cost value appears to be missing a 0	6	2.2.1.3, second paragraph	*Adjusting The Nature Conservancy's cost estimates by the increase in Consumer Price Index (CPI) between 2020 and 2024 leads to a capital cost estimate for Phase II of $9,100,00 and an O&M cost of $250 per acre-foot (AF) of water.*	The referenced cost of $9,100,00 is either missing a zero or the commas are misplaced. Based on the stated unit price of water supply it appears that a zero is missing.
CT-4	Chad Taylor	Editorial	Check date ranges in Project 2	7 & 8	2.2.2.2 & 2.2.2.4	*NA*	In the first paragraph of section 2.2.2.2 the historical program is referenced to have been active between 1995 and 2008, then in the third paragraph the range is 1998 to 2005 and the first paragraph of 2.2.2.4 references 1995 to 2008 again.
CT-5	Chad Taylor	Editorial	Explain costs for Project 2	7	2.2.2.3	*The cost to implement this project is driven by CMWD's water rates. CMWD's 2024 Tier 1 water rate is $1,730 per AF. This cost includes O&M to maintain CMWD's conveyance infrastructure. The project is envisioned to incentivize VCWWD-19 and Zone MWC by funding the difference between the cost of CMWD and the cost of pumping.*	Please provide an estimate of what the incentive cost offset might be.
CT-6	Chad Taylor	Technical / Editorial	Explain rationale for water supply estimte for Project 4	10	2.2.4.1	*VCWWD-1 has conducted preliminary numerical groundwater flow modeling to evaluate project feasibility. Their groundwater flow modeling study suggests that pumping 6,270 AFY for the desalter project would result in an additional 2,200 AFY of recharge to the ELPMA. Based on this, it is estimated that this project would increase the sustainable yield of the ELPMA by 2,200 AFY. Additional modeling is required to evaluate the effects of the proposed desalter under scenarios that are consistent with those evaluated in the GSP and Basin Optimization Yield study.*	Please explain how pumping 6,720 AFY of water to effect 2,200 AFY of recharge results in a sustainable yeild increase of 2,200 AFY. Does this mean that total recharge would equal 8,920 AFY because the 2,200 AFY is truly additional recharge? Readers are likely to see an extraction of 6,720 AFY less recharge of 2,200 AFY and assume that sums to a loss of 4,520 AFY.
CT-7	Chad Taylor	Editorial	Missing text	11	2.2.4.4, end of second paragraph	*Depending on the operational conditions and distribution of desalted water, this project.*	This sentence appears to be missing text
CT-8	Chad Taylor	Technical	Water quality impacts from Project 5	13	2.2.5.4	*While implementation of this project is anticipated to support groundwater level and storage management within the ELPMA, perennial surface water flow in Arroyo Simi-Las Posas is also thought to be the primary source of high TDS concentrations observed in the groundwater in the southern ELPMA (FCGMA 2019). Consequently, the water quality of the surface water flows will have to be investigated further and addressed through project implementation.*	The potential for water quality impacts to groundwater resulting from this project are concerning, especially as Project 4 is intended to address a similar existing issue stemming from the same water source as the one identified for Project 5.
CT-9	Chad Taylor	Technical	Recycled water desalter costs for individual recipients	14 - 15	2.2.6.2 & 2.2.6.3	*Additionally, recipients of the recycled water may be required to construct, operate, and maintain desalter facilities to reduce constituent concentrations to levels suitable for irrigation and to ensure that long-term use of this water does not result in a significant and unreasonable degradation of water quality in the LPV.*	Does the cost estimate in section 2.2.6.3 include the costs to individual recycled water recipients for construction, operation, and maintenance of desalter facilities to use recycled water? If not, what are those estimated costs and who would bear them?

Specific Comments from the Las Posas Valley Basin Technical Advisory Committee
Draft Initial Las Posas Valley Basin Optimization Plan

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment
CT-10	Chad Taylor	Editorial	Section title and and content disagreement	20-Jan	2.2.10.1	*NA*	The title of this section is "Water Supply" but the text referes to timing and appears to be misplaced as nearly identical text is in the next section.
CT-11	Chad Taylor	Editorial	Time agreement	20 & 21	2.2.10.1 & 2.2.10.2	*NA*	In section 2.2.10.1 a 1 year period is referenced for transducer installation and in 2.2.10.2 it is a 2 year period. Assume section 2.2.10.1 text is all misplaced, but if not please make this consistent or explain why it is not

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MEMORANDUM

To: Chad Taylor, PG, CHg, Todd Groundwater
From: Robert H. Abrams, PhD, PG, CHg., aquilogic, Inc.
Date: January 17, 2025

Subject: **Draft Comments on Draft Initial Las Posas Valley Basin (LPVB) Optimization Plan (BOP), Basin Optimization Yield Study (BOY) Schedule, and Modeling Scenarios for the BOY**
Project No.: 091-01

This memorandum is an update and replaces the memorandum I previously prepared on this subject and submitted to the Technical Advisory Committee (TAC) Administrator on January 15, 2025. Herein, the memorandum presents an overview of my comments on the BOP, BOY, and BOY schedule. Specific comments on the text of the BOP are included in the accompanying table. I understand that developing the BOP, ranking scheme, and choosing projects to include in the BOY is a complex task with many unknowns. Further, I understand the time constraints imposed on Watermaster. However, I think additional effort by Watermaster would provide more direction regarding project selection, project implementation, and a more concrete plan of action through 2040 to maximize the LPVB Operating Yield.

For project selection, I note that Item 8 under Timing/Feasibility includes a score for a project's dependency on other projects, as approved by the TAC. However, after reviewing the BOP, it seems apparent that an additional category should be included in the scoring: the dependency of other projects on the project being evaluated. For example, the Moorpark Desalter (Project 4) is a critical project because the full benefits of three other projects (1, 3, and 5) depend on lowering groundwater levels in the Shallow Aquifer around the Arroyo Simi-Las Posas. The Moorpark Desalter extraction wells will accomplish this reduction of groundwater levels, which will provide space in the Shallow Aquifer for additional groundwater recharge. Consequently, Project 4 should be included in the BOY. These dependencies on Project 4 do not appear to have been made explicit in previous documents provided to the TAC.

The current and future BOYs will set the Operating Yield and Rampdown Rate through 2039. Waiting for future BOYs to realize the maximum benefits of other projects will cause delays in maximizing the Operating Yield. Modeling of Project 4 should be conducted in conjunction with the projects that depend on it as soon as possible—2040 is fast approaching. The modeling is essential at this early stage of project implementation because the BOP states that the full effectiveness of three other projects will likely not occur without the Desalter in operation. Prior to such modeling, the TAC should be provided with supporting information that

demonstrates the East Las Posas Management Area (ELPMA) model is sufficiently calibrated and robust to evaluate water level changes associated with the Moorpark Desalter extraction wells, if such information does not already exist.

Furthermore, the BOP schedule should be revised to extend beyond 2029. The schedule should represent the game plan for implementing projects that will enable the LPVB to maximize the Operating Yield. Even if some of the schedule is speculative, doing so will demonstrate to stakeholders the BOYs are focused on the end goal.

I note for the record that only two of the ten proposed projects discuss the West Las Posas Management Area (WLPMA). Further, I am advocating for changes to the scoring of the following three projects:

- Three other projects apparently depend on **Project 4** to realize full benefits. Thus, Project 4 should be included in the BOY.
- **Project 8** seems like low-hanging fruit if demand can be reduced. It could potentially lower the Operating Yield requirement. If I understand the project correctly, it depends on whether water rights can be purchased/surrendered permanently rather than being an ongoing cost.
- I view **Project 9**, new monitoring wells, as a mechanism to avoid undesirable results. Without data there could be permanent undesirable results that go unnoticed.

The BOP overall would benefit if these three projects were scored higher. For example, the low score for Project 9 seems to contradict Watermaster's response, dated December 2, 2024, to Recommendation 1 of the *TAC Consultation Recommendation Report, Draft First Periodic Evaluation, Groundwater Sustainability Plan for the Las Posas Valley Basin*, dated October 10, 2024. In their response, Watermaster agrees that monitoring is a priority, i.e., Watermaster states: "*The Watermaster agrees that the monitoring in LPVB can be improved*." Nevertheless, Project 9 has a relatively low score. In addition, the fact that three other projects depend on Project 4 to realize full benefits indicates that Project 4 should be scored higher.

Watermaster also requested specific commentary on:

- **Schedule** The schedule as presented assumes all projects will be implemented. This will require sufficient resourcing, which does not appear to be finalized. Is it a schedule that shows what could be done, or is it a proposed schedule that Watermaster would follow? The schedule should extend beyond 2029 to show stakeholders and the public which projects will be implemented and when.
- **Projected costs** I'm not really qualified to comment, but costs given in the Appendices generally agree with the text. However, for Project 9, $550,000 per well may be high.
- **Scoring**

  - The scoring mechanism would benefit from including a category that indicates the importance of a project relative to other projects that are dependent on it to realize their full benefit (see comments BA-2, BA-4, BA-7, and BA-9).
  - See also detailed comments in the accompanying table on Projects 8 and 9.
- Regarding feasibility studies, if I understand Watermaster's specific question correctly, then yes, pulling out feasibility studies as separate Phases within a given project seems appropriate. However, doing so should not cause further delays in project implementation (i.e., Phase II of relevant projects).

Overall, it is not clear from the Schedule and Costs which projects will be implemented, because Appendices C and D include all of them. Perhaps clarity could be gained If Watermaster provided a proposed schedule and cost estimate that extends beyond 2029, for the projects Watermaster would like to include and commit to implementing. Doing so may provide a more realistic understanding of how much work Watermaster is actually planning to do.

Specific comments on the BOP text are provided in the accompanying table. I have not prepared comment tables for the other two items because my comments are covered here and/or the BOY and BOY schedule may need to be reconsidered if the recommendations herein are followed.

Lastly, if the United Water Conservation District's Coastal Plain model is not available for the BOY, Option 1 seems like the reasonable choice. However, there is not enough information provided to fully evaluate Option 2.

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MEMORANDUM

To: Chad Taylor, PG, CHg, Todd Groundwater
From: Robert H. Abrams, PhD, PG, CHg., aquilogic, Inc.
Date: January 15, 2025

Subject: Draft Comments on Draft Initial Las Posas Valley Basin (LPVB) Optimization Plan (BOP), Modeling Scenarios, and Basin Optimization Yield Study Schedule (BOYS)
Project No.: 091-01

The Moorpark Desalter (Project 4) appears to be a critical project because the full benefits of three other projects (1, 3, and 5) depend on lowering groundwater levels in the Shallow Aquifer around the Arroyo Simi-Las Posas. The Moorpark Desalter extraction wells will accomplish this reduction of groundwater levels, which will provide space in the Shallow Aquifer for additional groundwater recharge. Consequently, Project 4 should be included in the BOYS.

The BOYS will set Operating Yield and Rampdown Rate through 2039. Modeling of Project 4 should be conducted in conjunction with the projects that depend on it as soon as possible—2040 is fast approaching. The modeling is essential at this early stage of project implementation because the full effectiveness of three other projects will likely not occur without the Desalter in operation. Prior to such modeling, the Technical Advisory Committee (TAC) should be provided with supporting information that demonstrates the East Las Posas Management Area (ELPMA) model is sufficiently calibrated and robust to evaluate water level changes associated with the Moorpark Desalter extraction wells, if such information does not already exist.

Furthermore, the schedule should be revised to extend beyond 2029. The schedule should represent the game plan for implementing projects that will enable the LPVB to maintain the Operating Yield.

I note for the record that only two of the ten proposed projects discuss the West Las Posas Management Area (WLPMA). Further, I am advocating for changes to the scoring of the following three projects:

- Three other projects apparently depend on **Project 4** to realize full benefits. Thus, Project 4 should be included in the BOYS.
- **Project 8** seems like low-hanging fruit if demand can be reduced. It could potentially lower the Operating Yield requirement. If I understand the project correctly, it depends on

LAS POSAS VALLEY WATERMASTER RESPONSE REPORT

Date: December 02, 2024

To: Las Posas Valley Watermaster Board of Directors

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

Re: Response Report to TAC 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 Technical Advisory Committee (TAC) on the Draft First Periodic Evaluation, Groundwater Sustainability Plan for the Las Posas Valley Basin dated August 2024. Watermaster's request was in an August 26, 2024, memorandum to the TAC. The TAC discussed and developed its recommendation report at the September 17, 2024, October 2, 2024, and October 15, 2024, TAC meetings.

TAC's October 10, 2024, recommendation report included five comments / recommendations and an attachment with 179 comments by each of the TAC members on specific sections of the draft Periodic Evaluation. The five comments / recommendations are listed below, followed by Watermaster staff's responses. Watermaster staff's responses to the 179 specific recommendations are attached.

Comment / Recommendation 1: Inconsistent Groundwater Monitoring
TAC members all noted and commented on the inconsistency of groundwater elevation and water quality monitoring in the LPVB. Specifically, expected and necessary groundwater elevation and water quality measurement events have been routinely missed since adoption of the GSP. It is critical that these basic data be collected frequently and consistently as without them it is not possible to evaluate conditions in the Basin relative to sustainable management criteria with certainty. The TAC recognizes that the Watermaster relies on partner agencies for groundwater monitoring in many cases and cannot control the data collection programs of those agencies. However, the inconsistent data collection that has occurred as a result of this approach thus far presents a problem that is too large for the Watermaster not to address as quickly and effectively as possible. The TAC is concerned that important interpretations and statements regarding groundwater sustainability presented in the Draft GSP Evaluation are based on limited data (in some cases as little as one or two data points). These interpretations include evaluations of basin-wide, aquifer specific, and management area groundwater conditions, comparisons to minimum thresholds for groundwater sustainability, and conclusions regarding the effectiveness of groundwater management in the LPVB. The TAC questions whether the interpretations can be relied upon given that they are based on such limited and inconsistent data.

To address this inconsistent groundwater monitoring problem the TAC recommends the following:

1. Appropriately caveat interpretations, comparisons, and conclusions that rely on limited and inconsistently collected data (see detailed comments in the attached table for references to specific text passages).

2. Either establish agreements with partner agencies to consistently, correctly, and routinely collect the groundwater elevation and water quality data required to adequately assess groundwater conditions and progress towards sustainability or begin performing these monitoring responsibilities using Watermaster staff.
3. Fast track the projects in the GSP and Draft GSP Evaluation that include construction of monitoring wells and instrumentation of those and other monitoring wells with transducers (Projects 7 and 8, respectively). The Draft GSP Evaluation alluded to delays in implementation of these projects occurred because the Watermaster did not receive requested grant funds. The TAC recommends identifying alternative funding sources for this critical component of successful sustainable groundwater management. If alternative funding sources cannot be secured, consider requesting Technical Support Services (TSS) from DWR. The DWR TSS program was designed to provide field activity support, including monitoring well installation, groundwater level monitoring training, and other relevant assistance.
4. Expand the existing monitoring network by including private wells when and where necessary. While private, active, pumping wells are not perfect for groundwater elevation and water quality monitoring, they are a reasonable means of expanding monitoring networks into areas where dedicated monitoring wells don't exist and providing redundancy for existing monitored wells.

Response to Comment / Recommendation 1:
The Watermaster agrees that the monitoring in LPVB can be improved. The Watermaster will work with partner agencies to formalize agreements to monitor critical wells and will continue to pursue funding mechanisms to fill data gaps and install additional dedicated monitoring wells, if possible.

1. The GSP Evaluation text has been revised where appropriate to reflect limited and inconsistent monitoring data. Revisions to specific text passages in response to TAC's detailed comments are documented in the attached table.
2. The Watermaster will work with partner agencies to establish agreements to ensure appropriate 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.
3. Watermaster notes TAC's recommendation to fast-track the monitoring-well and instrumentation projects 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. 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 if alternative funding sources cannot be secured.
4. The overall monitoring network includes all wells that are screened in individual aquifers, in conformance with SGMA. This includes private production wells. As discussed in response to recommendation 2, Watermaster will take steps to improve routine groundwater monitoring.

Comment / Recommendation 2: Boundary Condition Differences in West and East Management Area Models

The Draft GSP Evaluation indicates that the model used to simulate conditions in the West Las Posas Management Area (WLPMA), the Coastal Plain Model, developed, maintained, and employed by United Water Conservation District (UWCD) was recently modified. The extent and nature of these modifications was not described in detail in the Draft GSP Evaluation, but TAC review did note that a potentially significant change was made to the boundary condition used to represent the Somis Fault, which separates the WLPMA from the East Las Posas Management Area (ELPMA). This component of the Coastal Plain Model that is important to the representation of groundwater flow in the LPVB was changed from a no-flow boundary condition to a partial general head boundary condition. This change means the Coastal Plain Model used for the Draft GSP Evaluation allowed flow from the WLPMA to the ELPMA.

The Draft GSP Evaluation indicates that the limited groundwater elevation information in this area of the LPVB implies limited groundwater flow across the Somis Fault and that gradients suggest that if flow occurs it is from ELPMA to WLPMA. Unfortunately, further exploration of the effects of the change to the Coastal Plain Model are not included in the document.

The ELPMA model used to simulate conditions in the ELPMA maintains a no-flow boundary along the Somis Fault, which the TAC assumes results in potentially significant differences in simulated groundwater flow across the WLPMA/ELPMA boundary in the two models. However, the differences between the flow conditions and water budgets in the two models is not described in the Draft GSP Evaluation. The TAC is concerned that the difference in the representation of this boundary between the two LPVB management areas signifies a problematic discrepancy in simulated groundwater flow and budgets within the LPVB.

The Draft GSP Evaluation does indicate that the Watermaster plans to coordinate with UWCD and the TAC to better align the representation of this boundary condition in advance of the Basin Optimization Yield Study. However, the Draft GSP Evaluation relies on simulations using these two models to assess the adequacy of the GSP to meet the sustainability goal of the LPVB, including the effect of projects and management actions and estimating historical changes in groundwater storage, effects of reductions in groundwater production, and sustainable yield for each management area.

The TAC also notes that the Draft GSP Evaluation includes references to multiple documents that include additional information regarding the changes to the Coastal Plain Model. However, these references are either not yet available for review or the information included in them is not included in the Draft GSP Evaluation.

The TAC recommends the following regarding this model discrepancy:

1. Add detailed information relating to the changes to the Coastal Plain Model. This should include maps showing the area of changed Somis Fault boundary conditions, volumes of flow between the two management areas, comparison to the version of the model used in the original GSP, etc. This additional detail should be aimed at providing information to alleviate concerns regarding the apparent inconsistency between the two models.

2. Include relevant information on the changes to the Coastal Plain Model in the Draft GSP Evaluation, not simply as references to other documents. Stakeholders and interested parties should not have to read reports for other basins to access information related to important components of the LPVB GSP Evaluation.
3. Assess and document the differences in simulated flow and water budgets across the Somis Fault between the two models and include this information in the GSP Evaluation.
4. Advance the coordination with UWCD and the TAC to develop agreement on the representation of this boundary in the two models. The coordination of this boundary between the two models should not wait until after the GSP is amended. The analyses in the amended GSP should be consistent with the Basin Optimization Yield Study.

Response to Comment / Recommendation 2:
Watermaster notes TAC's comments on the change in the boundary condition along the Somis Fault in the WLPMA portion of the Coastal Plain Model. UWCD developed and maintains the Coastal Plan Model and made this change, as was identified in the draft GSP Evaluation. UWCD is currently working on the supplemental documentation to cover the changes made since the GSP version of the model. As of the time this response report was prepared, UWCD had not yet finalized this supplemental documentation.

Water budgets are provided for each management area in the draft GSP Evaluation. These budgets are similar to those presented in the GSP, and changes to the Coastal Plain Model do not manifest in large changes to the sustainable yield estimate of the WLPMA. Watermaster will continue to work with the TAC to improve the understanding of the potential impact of management actions and projects in the LPVB.

The current models used for the WLPMA and ELPMA are the best available tools for assessing the impacts of projects and management actions. The TAC rightly points to areas where these models can be improved for future use.

1. Watermaster has forwarded TAC's recommendation to UWCD. UWCD is currently working on the supplemental documentation to cover the changes made since the GSP. As of the time this response report was prepared, UWCD had not yet provided a date when the supplemental documentation will be made available.
2. Please see response above.
3. Water budgets are provided for each management area. These budgets are similar to those presented in the GSP, and changes to the Coastal Plain Model do not manifest in large changes to the sustainable yield estimate of the WLPMA. Watermaster will continue to work with the TAC to improve the understanding of the potential impact of management actions and projects in the LPVB.
4. Watermaster notes and thanks TAC for its comment.

Comment / Recommendation 3: Relationship Between Oxnard Subbasin and Sustainability in the WLPMA
The TAC is concerned that the methods used to date to assess the effects of pumping in the WLPMA on seawater intrusion conditions in the Oxnard Subbasin lack scientific rigor. The Draft GSP Evaluation presented model scenarios that included simultaneous changes in pumping volumes in the WLPMA, both Oxnard aquifers, and the Pleasant Valley Basin. The results of these simulations

were then compared to a baseline scenario and the changes to simulated seawater intrusion in the Oxnard Subbasin were used to evaluate effects on sustainable yield in the WLPMA. However, the changes to pumping volumes in the scenarios appeared to be relatively arbitrary and the TAC is concerned that the resulting sustainable yield estimates for the WLPMA are similarly arbitrary.

The TAC recommends developing model scenarios that limit changes to single variables to assess the impacts of those variables on sustainability. This could include scenarios where pumping in the Oxnard Subbasin and Pleasant Valley Subbasin are held constant while pumping in WLPMA is varied. Comparison of the results of such simulations could then be compared to the baseline to evaluate changes in seawater intrusion in the Oxnard Subbasin, thereby developing a relationship between pumping volume in WLPMA and seawater intrusion. Similar scenarios with reductions in pumping in only the Oxnard Subbasin and only the Pleasant Valley Basin could also be conducted to isolate the effects of changes in pumping in those basins on seawater intrusion. Estimates of the effects of pumping reductions in each individual basin could then be used to more precisely identify the sustainable yield in each basin.

Response to Comment / Recommendation 3:
The connection between the WLPMA and the Oxnard Subbasin was established with rigorous scientific evaluation and review through the Technical Advisory Group prior to SGMA. The evaluation does not seek to quantify the impact of pumping in one basin on another. Rather, it follows SGMA and the GSP by acknowledging the interconnectedness of the Oxnard Subbasin and the WLPMA. The WLPMA sustainability yield was estimated with appropriate scientific rigor through numerical flow modeling.

Watermaster agrees that TAC provides good recommendations for modeling scenarios that could be conducted in the future.

Comment / Recommendation 4: Respond Completely to all Elements of the DWR Recommended Corrective Actions

The DWR recommended corrective actions (RCAs) all include multiple requests for additional information, and the responses did not always provide all the requested information. For instance, the RCA 2 requests discussion of the potential effects of the minimum thresholds and measurable objectives on beneficial uses and users of groundwater. However, the sections of the Draft GSP Evaluation intended to respond to this RCA may not adequately respond to this request. The discussion that is included is somewhat vague about the beneficial uses and users and includes errors, as detailed in the specific comments in the attached table. This is true for other RCA responses as well, as documented in the attached table.

The TAC recommends carefully reviewing the entirety of each RCA and identifying each component of DWR's request and including responses. The TAC believes that it is better to acknowledge each element of the RCA, even if there is insufficient information to completely address the request. In such cases it would be appropriate to indicate how the Watermaster plans to address the RCA in the future.

Response to Comment / Recommendation 4:
Watermaster agrees with TAC's comment / recommendation. The GSP Evaluation text has been clarified and revised, where appropriate, to further explain the responses to DWR's recommended corrective actions. The revised text is responsive to DWR's recommended corrective actions.

Comment / Recommendation 5: Check Entire Document for Consistency of Language and Content
The TAC noted variability in the Draft GSP Evaluation relating to use of language when presenting important conclusions and between tables and text. The TAC review specifically noted sections of text that presented the same information but used different language that was sometimes less certain and/or impactful. Instances of passive and uncertain terminology in important conclusions were also observed.

The TAC recommends the authors review the detailed comments in the attached table and perform a thorough review of the document to maintain consistent content and impact throughout.

Response to Comment / Recommendation 5:
The draft GSP Evaluation text was reviewed and revised where appropriate in response to TAC's comment / recommendation. The text and tables of the GSP evaluation have been revised, where appropriate, in response to TAC comments provided in the table attached to the recommendation report. The detailed responses to the comments are listed in the attached table.

Specific Comments from the Las Posas Valley Basin Technical Advisory Committee
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Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment	Watermaster Response
BB-TC-1	Bryan Bondy	General Technical	Interpretations Made Based on Limited Data	--	--	--	Interpretations presented in the document that are based on limited data (in some cases as little as one or two data points), should be appropriately caveated and, as discussed in other comments, steps should be taken to better coordinate with monitoring partners to reduce the frequency of missing data.	Noted. The text and tables of the GSP evaluation have been revised, where appropriate, in response to TAC comments provided in the table attached to the recommendation report. The detailed responses to the comments in the table are listed below.
BB-TC-2	Bryan Bondy	General Technical	Missing Monitoring Data	--	--	--	There are a notable number of unavailable groundwater level and quality measurements during period since GSP adoption. It is critical that data be collected to evaluate status relative to the sustainable management criteria and more generally understand groundwater conditions. It is noted that FCGMA does not collect data itself and, instead, relies on other entities monitoring programs for data. To date, it does not appear that FCGMA has formalized arrangements with the monitoring entities. It is recommended that FCGMA coordinate with the monitoring entities communicate FCGMA's data needs and formalize agreements. In cases where the monitoring entities cannot commit to providing certain data or if monitoring locations are no longer available or accessible, FCGMA should take steps to address those gaps.	The Watermaster agrees that the monitoring in LPVB can be improved. The Watermaster will work with partner agencies to formalize an agreement to monitor critical wells and will continue to pursue funding mechanisms to install additional dedicated monitoring wells and fill data gaps, if possible.
BB-TC-3a	Bryan Bondy	Technical	--	ES-2	3rd paragraph	*In the western part of the WLPMA groundwater elevations in the FCA were higher in water year 2024 than they were in water year 2015.*	Based on Figure 2-4, there does not appear to be any 2024 groundwater level measurements in the western half of the WLPMA. Therefore, it is unclear what data the quoted sentence is based upon.	Figure 2-4 only shows the water level changes in the key wells relative to groundwater elevations in 2015, the minimum thresholds, and measurable objectives. Groundwater elevations are measured in wells throughout the monitoring network. The quoted sentence is based on figures 2-7 and 2-8
BB-TC-3b	Bryan Bondy	Technical	--	ES-2	3rd paragraph	*In contrast, groundwater elevations in the eastern part of the WLPMA were lower in water year 2024 than they were in water year 2015.*	Based on Figure 2-4, there is one well indicating a higher groundwater level in 2024 and one indicating a lower groundwater level in the eastern half of the WLPMA. Therefore, it is unclear what data this statement is based upon.	See above response.
BB-TC-3c	Bryan Bondy	Technical	--	ES-2	3rd paragraph		Consider instead distinguishing between changes in the pumping depression in the southeastern corner of the WLPMA versus the remainder of the management area, with groundwater levels appearing to be lower in former and higher in the latter.	Text has been revised.
BB-TC-4	Bryan Bondy	Technical	Representative Monitoring Points		Figure 2-2 Table 2-2	--	Consideration should be given to enhancing the RMP network (per review of Figure 2-2): • Western WLPMA – there is no RMP for the Fox Canyon Aquifer • WLPMA and ELPMA – both areas lack GCA RMPs (potential candidate RPM well is 03N19W30E07-D) • Epworth Gravels – only one RPM (potential candidate for additional RMPs include 03N19W30M02 and 03N19W30E07-S)	Noted. These areas are identified in the GSP. FCGMA will investigate the inclusion of the recommended wells as RMPs.
BB-TC-5	Bryan Bondy	Technical	Zone Mutual Water Company Infrastructure Improvement Project		Table 1-1, 4th row; Section 3.2.1; Section 5.2.2.1.5	--	While Zone Mutual Water Company (Zone) is moving forward with the infrastructure improvements described in the evaluation report, Zone has indicated there are potential legal issues that may prohibit or limit Zone's ability to wheel water to non-shareholders. These issues need to be studied along with other opportunities for moving water between WLPMA and ELPMA. Regarding the 500 AFY of water savings associated with converting from scheduled deliveries to on-demand deliveries, this benefit should not be included in the future water supplies for the Projects Scenario because that water savings will be retained as carryover or leased to other water right holders for the benefit of Zone shareholders unless Watermaster creates a financial mechanism to make Zone whole.	Noted. The project description was solicited as part of the FCGMA Board project prioritization process that commenced prior to formation of the TAC. The project description provided by the project proponent was used to incorporate the project into the model for the GSP evaluation. Revisions to the project description are planned for the Basin Optimization Plan.
BB-TC-6	Bryan Bondy	Technical	Analysis of Effects of MTs on Beneficial Users in ELPMA	7-8	Section 2.2.1.2; Table 2-1	*The depth and groundwater production rates from the wells in this area indicate that they are agricultural wells…*	This statement is incorrect. 10 of the 22 wells are Calleguas ASR wells.	Text has been revised
BB-TC-7	Bryan Bondy	Technical	Analysis of Effects of MTs on Beneficial Users in ELPMA	7-8	Section 2.2.1.2; Table 2-1	--	The reviewer checked the top perforation elevation of 13 of the 22 wells in Table 2-1 for which data was readily available and found 12/13 to be incorrect, with errors averaging 48 feet ranging from 10 to 364 feet. Using the correct elevations for the twelve wells reviewed would add three wells to the number of wells with a projected groundwater elevation below the top of the screen. Based on these findings, a full QC of this table is warranted.	Table values were revised.
BB-TC-8	Bryan Bondy	Technical	Analysis of Effects of MTs on Beneficial Users in ELPMA	7-8	Section 2.2.1.2; Table 2-1	--	The analysis implies that significant effects will not manifest until the static groundwater level drops below the top of the screen in a well. The analysis also implicitly assumes that pumping can be sustained with pump placements in the screen interval. These assumptions are inconsistent with the generally accepted well design principle of pump placement above the top of screen to avoid pump bowl or screen abrasion, sand production, cascading water, and accelerated fouling (Glotfelty, 2019 - Art of Water Wells). Wells with partially desaturated screens commonly experience increased fouling rates (sometimes very rapid), which causes significant loss of production, premature well rehabilitation, and premature well replacement. Text should be added to explain why these effects are not considered in the analysis.	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 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."
BB-TC-9	Bryan Bondy	Technical	Analysis of Effects of MTs on Beneficial Users in ELPMA	7-8	Section 2.2.1.2; Table 2-1	--	Given that 10 of the 22 wells identified in Table 2-1 are Calleguas ASR wells, the analysis should address potential effects on storage and recovery operations of the Calleguas ASR well fields.	The Watermaster is a member of the Calleguas ASR Study Group that will develop a Calleguas ASR Project Operations Plan. Future evaluations will include information from this effort.
BB-TC-10	Bryan Bondy	Technical	GDEs	34	Section 2.7.2	*The areas where satellite imagery indicates declining plant cover may be related to shifting flow patterns within the arroyo, with decreasing greenness on the banks of the arroyo and decreasing greenness in the downstream portion of the arroyo, adjacent to the PVB.*	Another potential explanation for decrease greenness could be vegetation removal during high flow events during the 2023 and 2023 wet seasons. Air photos could be reviewed to assess this.	Text has been added to note this.

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BB-TC-11	Bryan Bondy	Technical	Arroyo Simi-Las Posas Water Acquisition Project	40	Section 3.1.2.3.2 and Table 3-1	*Text states the project "will make additional water available to recharge" and table states the project benefit will be "increase in sustainable yield."*	These statements are incorrect. The project would ensure that existing inflows continue, which maintains status quo, as opposed to adding water to the ELPMA water balance.	Revised.
BB-TC-12	Bryan Bondy	Technical	--	43	Section 3.2.2	*Text states the project would "reduce the dependence on imported water in the LPVB by providing new local potable supplies" and later states the project will "reduce groundwater demands in the LPVB."*	These statements appear to be in conflict. Please provide information about anticipated reductions in groundwater demand vs. reduction in imported water purchases. In other words, what is the anticipated net benefit to the ELPMA water balance?	Text has been revised to remove the reference to reducing groundwater demands.
BB-TC-13	Bryan Bondy	Technical	New Data for ELPMA	51	Section 4.1.1.1	*No new information is available that would improve or update the understanding of the hydrogeologic conceptual model of the ELPMA and Epworth Gravels Management Area.*	Calleguas has constructed three multi-level groundwater monitoring wells, which provides new stratigraphic data for the hydrostratigraphic model. In particular, 03N19W30E07 is a nested monitoring well that provides data to better characterize the Epworth, FCA, and GCA in northern ELPMA and 02N20W11B01-3 is a clustered monitoring well that provides data better characterize the Upper San Pedro Formation and FCA south of the Moorpark Anticline in the ELPMA. In addition, groundwater level data collected from these wells can be used to characterize vertical gradients. These data should be incorporated into the Hydrogeologic Conceptual Model.	Text has been added to the hydrogeologic conceptual model section noting the construction of these wells.
BB-TC-14	Bryan Bondy	Technical	Data Gaps in the HCM	52	Section 4.2; Table 4-1	--	Text states that no additional information has been collected to address data gaps. Please see prior comment. New data from Calleguas' multi-level groundwater monitoring wells helps address the data gaps listed in Table 4-1.	Text has been revised.
BB-TC-15	Bryan Bondy	Technical	WLPMA Model Update		Section 5.1.1, Table 2-4b	--	Review of the modeling for the WLPMA cannot not be completed at this time because documentation of the Coastal Plan model is not yet available. Based on review of the GSP evaluation, there are several issues with the Coastal Plain model that appear worthy of further review in consultation with the TAC. Additional items worthy of further review may be identified after documentation review. The issues identified based on the GSP evaluation review include (1) conversion of the WLPMA-ELPMA model boundary from no-flow to general head, (2) inconsistency between the model LAS water balance (Table 2-4b), which indicates little to no underflow from the Oxnard Subbasin into WLPMA in contrast with spring groundwater elevation contours in the annual reports that suggest there is underflow from the Oxnard Subbasin into WLPMA; (3) groundwater exchange between Pleasant Valley Basin and WLPMA; and (4) groundwater exchange between ELPMA and WLPMA.	Noted. Thank you for your comment.
BB-TC-16	Bryan Bondy	Technical	WLPMA Modeling and Sustainable Yield Estimate for WLPMA		Section 5.2.2.1 and Section 5.2.3.1	--	While assessment of impacts on adjacent basins is clearly required under SGMA, the framing and analysis of WLPMA impact on Oxnard Basin and the approach to estimating WLPMA sustainable yield seem problematic for multiple reasons. First the analysis has not isolated the impact of WLPMA pumping on seawater intrusion for technical evaluation and consideration in policy making. Second, the analysis of the interaction between WLPMA and the Oxnard Subbasin appears to ignore the fact that numerous WLPMA groundwater pumpers pay pump fees to UWCD. This is evident in the discussion of the underflows from Oxnard Subbasin into WLPMA, which are characterized as a "losses of underflow recharge" to the Oxnard Subbasin. The implication is that WLPMA is taking water away from the Oxnard Subbasin, when, in fact, many pumpers have paid for the benefit of underflow from UCWD's recharge operations. Consideration should be given to reframing analysis of WLPMA impacts on seawater intrusion and WLPMA sustainable yield to account for underflow that is paid for by WLPMA extraction fees paid to UWCD and additional analysis that isolates the actual influence of WLPMA pumping on seawater intrusion.	The term "loss" has been replaced in this section by the term "difference" to remove an unintended value judgement in the draft.
BB-TC-17	Bryan Bondy	Technical	Future Baseline with EBB Results	85	Section 5.2.2.1.6	--	Regarding the Future Baseline with EBB scenario, the text states "These results indicate that groundwater production at the average 2016 to 2022 rates in the Oxnard Subbasin, PVB, and WLPMA may be sustainable if UWCD's EBB project is implemented at a 10,000 AFY production scale." It is unclear how this scenario can be considered sustainable for the WLPMA because Figures 5-23a and b show minimum threshold exceedances for this scenario.	Noted. The text has been revised to include this observation. The minimum threshold may need to be shifted in WLPMA, as well as at the coast, if EBB is implemented.
BB-TC-18	Bryan Bondy	Technical	ELPMA Future Baseline Scenario		Section 5.2.2.2.1	--	Please incorporate the table produced for TAC titled "Summary of Annual Discharges Simulated in the East Las Posas Model (2040-2069 Average" into the evaluation report in this section as it provides important context for technical evaluation of the scenarios.	Table was added.
BB-TC-19	Bryan Bondy	Technical	--	91	Section 5.2.3.2	--	Average ELPMA pumping 2021-2022 value of 23,800 incorrectly includes Epworth Gravels pumping and should be reduced to 23,400 (see Table 4-4). After making that correction, the amount of extraction in excess of the upper estimate of sustainable yield becomes 1,900 AFY and should be updated.	Text has been revised.
BB-TC-20	Bryan Bondy	Technical	--	92	Section 5.2.3.3	--	The 2021-2022 average annual extractions from the Epworth Gravels is incorrectly reported as approximately 900 AFY and being approximately 450 AFY lower than the estimated upper end of the sustainable yield. Per Table 4-4, the 2021-2022 average annual extractions should be approximately 460 AFY, which is approximately 890 AFY lower than the estimated upper end of the sustainable yield.	Text has been revised.
BB-TC-21	Bryan Bondy	Technical	Monitoring Network		Section 6	--	Consideration should be given to incorporating the three multi-level monitoring wells constructed by Calleguas in the ELPMA into the monitoring network. These monitoring well nests/clusters provide valuable aquifer specific data, including much needed data for the Grimes Canyon Aquifer at one location. Data from these wells are already provided to FCGMA by Calleguas MWD on a regular basis.	Text has been revised.

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Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment	Watermaster Response
BB-TC-22	Bryan Bondy	Technical	Revisions to CMWD Monitoring Network	95	Section 6.1; Table 6-2	*Four of the wells have been removed from the monitoring network because they were either destroyed or CMWD had recurring access issues.*	Calleguas has not had access issues. The following are clarifications concerning the wells listed in Table 6-2: • Well 03N20W32H02S has been dry for numerous years. Calleguas continues to check the well for water and will reinstall a transducer if water returns. Consider retaining in monitoring network pending increasing groundwater levels. • Well 02N20W02D02S was destroyed by the owner. • Well 03N20W36P01S has a transducer stuck in the sounding tube. The transducer will be reinstalled the next time the well pump is removed. • Well 03N20W35J01S is continuing to be monitored with a transducer. However, the groundwater levels are considered anomalous. It is recommended that this well be removed from the monitoring network due to anomalous data. • Well 02N20W01B02 is noted as being added to the monitoring network in Table 6-2. This is not correct. This well was already included in the monitoring network in the GSP. Table 6-2 says no water quality sampling. This is not correct. Water quality samples are collected according to satisfy Division of Drinking Water requirements and are available from Calleguas or from the SWRCB website. Calleguas has added its three multilevel groundwater monitoring wells to its monitoring network.	These suggestions have been incorporated into the text
BB-TC-23	Bryan Bondy	Technical	Change in CMWD Monitoring Schedule	96	Table 6-3	--	Table 6-3 indicates that several wells are “no longer monitored” for water quality. It is noted that Calleguas has never sampled these wells (except once for monitoring wells immediately following construction). FCGMA incorrectly assumed that Calleguas was sampling these wells. Well 02N19W06F01S is an agricultural well, not a monitoring well. Well 02N20W09Q08S is a monitoring well, not a municipal well.	Table has been changed and text has been revised.
BB-TC-24	Bryan Bondy	Technical	Water Level Measurements: Temporal Data Gap, p. 98	98	Section 6.2.2.2	*Currently, groundwater elevation measurements are not scheduled according to these criteria because FCGMA relies on monitoring by several other agencies. To minimize the effects of this type of temporal data gap in the future, it would be necessary to coordinate the collection of groundwater elevation data, so it occurs within a 2-week window during the key reporting periods of mid-March and mid-October. The recommended collection windows are October 9–22 in the fall and March 9–22 in the spring.*	Calleguas and VCWWD have transducers installed in all the wells in their monitoring network. The only reason data may be missing for these wells during the fall and spring two-week windows is if a transducer has failed and is pending reinstallation. FCGMA is encouraged to coordinate with Calleguas and VCWWD to facilitate determine an approach for collection of manual groundwater level measurements to address the fall and spring window data needs.	Text has been revised to recognize where transducers are already installed.
BB-TC-25	Bryan Bondy	Technical	Water Level Measurements: Temporal Data Gap, p. 98	98	Section 6.2.2.2	*Additionally, as funding becomes available, pressure transducers should be added to wells in the groundwater monitoring network.*	It is noted that Calleguas and VCWWD already have transducers installed in all the wells in their monitoring network.	Text has been revised to recognize where transducers are already installed.
BB-TC-26	Bryan Bondy	Technical	Water Level Measurements: Temporal Data Gap, p. 98	98	Section 6.2.2.2	*Since adoption of the GSP, 13 wells that were to be monitored for groundwater quality are no longer monitored for groundwater quality. The majority these wells, 11 of the 13 wells, are representative monitoring wells located in the ELPMA.requirements.*	As noted in comment BB-TC-23, Calleguas never committed to sample the wells in its monitoring network, other than ASR wells, which are sampled to comply with Division of Drinking Water requirements.	Table has been changed and text has been revised.
BB-TC-27	Bryan Bondy	Technical	Data Gaps	97	Section 6.2	--	Consideration should be given to reevaluating data gaps in consultation with TAC after FCGMA staff have met and conferred with the monitoring entities.	Noted. This suggestion has been added to the list of coordination activities to be performed in the upcoming years.
BB-TC-28a	Bryan Bondy	General Technical	Potential Additional Report Elements	--	--	--	1.Consideration should be given to including groundwater level contour maps. Perhaps the annual report figures could becompiled into an appendix.	Noted. The focus of this evaluation is on the progress toward implementation. Contour maps are generated annually and included in the annual reports, which are available online at the FCGMA and DWR websites.
BB-TC-28b	Bryan Bondy	General Technical	Potential Additional Report Elements	--	--	--	2.Consideration should be given to including discussion concerning whether there were any notable changes in the spatialdistribution of pumping in the management areas.	Noted. This is a good suggestion for incorporation into the annual reports.
BB-EC-1	Bryan Bondy	General Editorial	Figure References	--	--	--	The reviewer noticed a number of incorrect figure and table number references in the text. Consider QC'ing.	Text, figures, and tables have been QC'd.
BB-EC-2	Bryan Bondy	Editorial	--	120	Figure 2-2	--	Wells 18H12 and 17L01 (WLPMA) and 01Q02 (ELPMA) are depicted as RMP/Key Wells but are not identified as such in the GSP and are not listed in Table 2-2.	Figure has been revised
BB-EC-3	Bryan Bondy	Editorial	--	120	Figure 2-2	--	RMP/Key Well 35R02 is missing on Figure 2-2.	Figure has been revised
BB-EC-4	Bryan Bondy	Editorial	--	ES-3	2nd full paragraph	*...14 key wells in the ELPMA...*	per Table 2-2 and the GSP, there are 15 (13 FCA and 2 Shallow Aquifer).	Revised.

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BB-EC-5	Bryan Bondy	Editorial	--	122 and 124	Figures 2-3 and 2-4	--	These figures are a clever approach to communicating status relative to the SMCs. However, while the graphics in the lower half of the figures are intuitive, they are misleading because the scale for each well is different. This is most evident in the fact that the distance between the MO and MT lines are same for each well when the actual distance between MO and MT ranges from 20 to 100 feet. Additionally, wells appear closer or further from their respective MO / MT relative to other wells than they actually are. For example, the Spring 2024 groundwater levels for 26R03 and 01B02 on Figure 2-4 visually appear to be very different heights above their respective MOs but are actually about the same (24 and 23 feet, respectively). At a minimum, the bottom graphics should be noted as being not to scale and that the graphics for the various wells are not comparable. Preferable, the graphics would be adjusted to that all wells are at the same scale and the actual distances between MO and MT for each well are depicted.	Noted. The intent of these figures is to summarize the status relative to the SMCs. The graphics are scaled to the difference between the MT and MO. This information has been added to the figures. Absolute change in groundwater level relative to the MT and MO is displayed in the hydrographs.
BB-EC-6	Bryan Bondy	Editorial	--	ES-4	1st paragraph	--	The values in this paragraph are incorrect: • Average WLPMA pumping 2021-2022 was 4,000 AFY more than the upper estimate of sustainable yield, not 3,100 AFY (see value reported on p. 90). • Average ELPMA pumping 2021-2022 was 1,900 AFY more than the upper estimate of sustainable yield, not 2,300 AFY (note: although 2,300 is reported on p. 91, the pumping used for the calculation incorrectly includes Epworth Gravels pumping).	WLPMA reference has been updated to 4,000 AFY more than the upper estimate of the sustainable yield. The ELPMA reference was not updated. The 2021-2022 extraction of 23,800 AFY is 2,300 AFY higher than the upper end estimate of the sustainable yield for the ELPMA (21,500 AFY, inclusive of pumping within the Epworth Gravels). Consistent with the GSP, the sustainable yield includes the Epworth Gravels. Page 91 has been updated to note this.
BB-EC-7	Bryan Bondy	Editorial	--	1	Table 1-1, 2nd row	--	Consider also mentioning Simi Valley dewatering wells here, i.e., the City of Simi Valley is no longer planning to divert dewatering well discharges to a desalter for potable use.	Added
BB-EC-8	Bryan Bondy	Editorial	--	6	Section 2.2 second paragraph	--	Per Figure 2-4, groundwater elevations were measured in 16 of the 21 key wells, not 15 as indicated in the text.	Revised.
BB-EC-9	Bryan Bondy	Editorial	--	24	Table 2-5	--	WLPMA – LAS estimated 2016-2024 change in storage value is incorrect. S/B -32,970	Revised.
BB-EC-10	Bryan Bondy	Editorial	--	52	Section 4.1.3.1	--	It is unclear what new information has been incorporated into understanding of recharge areas.	Noted. This is correcting an omission in the GSP.
BB-EC-11	Bryan Bondy	Editorial	--	55	Section 4.3.2.1	--	Text states “Available data characterizing groundwater extractions in water years 2021 and 2022 indicate that groundwater extractions from the LPVB averaged approximately 42,400 AFY (Tables 4-3 and 4-4).” Per the referenced tables, the value cited in the text should be 40,400 AFY.	Revised.
BB-EC-12	Bryan Bondy	Editorial	--	Table 4-4		--	WY 2022 Epworth Gravels Aquifer extraction value appears anomalously low. Consider investigating and/or footnoting.	This is the correct value, although the reported extraction value had to be estimated from the AMI data and may be lower than the actual volume produced.
BB-EC-13	Bryan Bondy	Editorial	--	Table 4-4		--	Please footnote table to clarify whether values include Calleguas MWD extractions.	This table does not include the CMWD extractions. A footnote has been added to the table.
BB-EC-14	Bryan Bondy	Editorial	--	68-69		--	Something is wrong with the transition from p. 68 to p. 69.	Noted. Thank you for your comment.
BB-EC-15	Bryan Bondy	Editorial	--	86	Section 5.2.2.2.1	--	Second bullet – the wrong model is referenced.	Revised.
BB-EC-16	Bryan Bondy	Editorial	--	Table 6-1		--	Explanation for footnote “a” is missing.	Footnote designation was added in error. Table has been revised.
BB-EC-17	Bryan Bondy	Editorial	--	98		--	“CGMA” s/b “FCGMA”	Revised.
BA-1	Bob Abrams	General Technical	Groundwater Monitoring	--	--	--	Overall, monitoring in the LPVB could be improved. Many key wells have not been monitored and no reasons for this are provided. For example, key well 02N20W06R01S, which has been below the water-level minimum threshold, was not monitored in 2024. The lack of monitoring seems particularly true in the West Las Posas Management Area (WLPMA), where there are five key wells but only two or three are ever monitored. The lack of explanation could be interpreted to mean that the Fox Canyon Groundwater Management Agency (FCGMA) is trying to downplay this issue.	The Watermaster relies on other agencies for monitoring data and agrees that the monitoring in LPVB can be improved. All available data collected during the March and October have been included in the evaluation. The Watermaster will work with partner agencies to formalize an agreement to monitor critical wells and will continue to pursue funding mechanisms to install additional dedicated monitoring wells, if possible.
BA-2	Bob Abrams	General Technical	Projects and Management Actions	--	--	--	In terms of projects benefitting the LPVB, the evaluation appears to indicate that action is being delayed because of the Judgment and Basin Optimization Plan. For example, it appears that FCGMA has spent most their time on the Oxnard Basin model, work that was done by United Water Conservation District (UWCD). This seems to be the only substantive management action that has moved forward in LPVB.	The introductory text to the projects and management actions section of the GSP Evaluation provides context for the reader on the additional work that has been done since the GSP was adopted as well as the work that is mandated by the Judgment. FCGMA continued to work on the projects identified in the GSP, and solicited additional projects after the GSP was adopted. FCGMA also provides a detailed list of the actions taken by the agency since the GSP adoption in section 7 of the GSP periodic evaluation. The statement that UWCD's updates to the Coastal Plain model are "the only substantive management action that had moved forward in the LPVB" is a mischaracterization of the extensive work that is documented in the periodic evaluation. Furthermore, the improvements to the Coastal Plain model represent a technical improvement, but are not a management action.

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BA-3	Bob Abrams	General Technical	Grimes Canyon Aquifer	--	--	--	The Grimes Canyon Aquifer (GCA) seems to be mentioned then ignored. In WLPMA, where data are particularly sparse, it just gets lumped into the Lower Aquifer System (LAS).	There are no monitoring wells screened solely in the GCA. This is a data gap that FCGMA has sought to fill by pursuing SGM grant funding for monitoring wells in the LPVB. 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. Watermaster staff continues to work to secure funding that can be used to install dedicated monitoring wells and fill data gaps, including in the GCA.
BA-4	Bob Abrams	General Technical	Recharge Figures	--	--	--	Figure 4-1 that shows recharge areas for Fox Canyon Aquifer (FCA). Why no equivalent figure for the GCA recharge area?	The recharge area consists of undifferentiated outcrops of FCA and GCA. The text and figure have been revised accordingly.
BA-5	Bob Abrams	General Technical	Water Quality	--	--	--	There are indications of deteriorating groundwater quality in localized areas. The Evaluations states that this is not related to pumping, but no explanation is given for why for the local concentration increases. Is water from the Upper San Pedro possibly being pulled down by pumping?	Groundwater from the Upper San Pedro is being pulled down by groundwater production in the Fox Canyon aquifer. The Upper San Pedro is a principal source of recharge to the underlying aquifers. There are not enough data to suggest that groundwater quality changes are related to groundwater production, or that the groundwater quality in the Upper San Pedro is worse than the groundwater quality in the underlying FCA (see figures 2-19 through 2-23).
BA-6	Bob Abrams	General Technical	Groundwater Monitoring	--	--	--	FCGMA appears to source most or all of the necessary monitoring data from other agencies. Thus, there is no apparent direct culpability if data are not collected.	FCGMA relies on other agencies with jurisdiction to monitor their respective wells and monitoring points. The agencies coordinate with each other, and FCGMA appreciates the professionals that collect the data from each agency and understands that each agency acts in good faith to access a monitoring point and collect data. As discussed above, The Watermaster will work with partner agencies to formalize an agreement to monitor critical wells
BA-7	Bob Abrams	General Technical	Groundwater Modeling	--	--	--	A large amount of new modeling work for the Oxnard Basin is presented. This work is only slightly relevant to the WLPMA of LPVB, but much attention is devoted to describing this work in the Evaluation. The many particle tracking figures presented do not appear to be relevant to the Evaluation.	The particle tracks are presented to show the modeled influence of each scenario on seawater intrusion. These are relevant to the WLPMA, which is included within the model domain because it is hydrogeologically connected to the adjacent Oxnard Subbasin.
BA-8	Bob Abrams	Editorial	--	ES-1	Footnote 1	--	Not sure what this is referring to?	Typo has been corrected
BA-9	Bob Abrams	Editorial	--	ES-1	Footnote 2	*Under the Judgment adopted in the LPVB adjudication (Las Posas Valley Water Rights Coalition, et al. v. Fox Canyon Groundwater Management Agency, Santa Barbara Sup. Ct. Case No. VENC100509700) water year 2024 begins on October 1, 2024 and will end on September 30, 2025.*	Need to explain how this apparent mismatch will be managed in the document and in future. Water Year and Court Water Year (when required)?	Clarification added to footnote.
BA-10	Bob Abrams	Editorial	--	ES-2	--	*Because the Judgment is still being implemented and subject to appellate court review, its effect on FCGMA's implementation of the LPVB GSP and sustainable management of the LPVB is uncertain.*	Not clear what this sentence achieves? Suggest re-wording or deleting.	This sentence is to advise DWR that there may be impacts to the implementation of the LPVB GSP that are not currently understood. Future GSP evaluations may need to explain how implementation has differed from what is presented here, and the reasons why.
BA-11	Bob Abrams	Technical	--	ES-2	--	--	Groundwater elevations in the GCA in WLPMA are not mentioned? This is inconsistent, as it is mentioned for ELPMA Need to mention that there are few wells in the GCA in WLPMA and this is an area of uncertainty? Or is it the intention to call the FCA/GCA the LAS in WLPMA as per Table 2.2 and brush over the lack of aquifer specific wells?	The lack of aquifer specific wells was discussed thoroughly in the GSP and is presented clearly in the GSP evaluation. The Watermaster will develop estimated costs and a spending plan, with committee consultation, to include in Watermaster's annual budget for funding through basin assessments to provide funding to install additional dedicated monitoring wells and transducers. There are no monitoring wells screened solely in the GCA in the WLPMA and only one in the ELPMA. This is a data gap that FCGMA has sought to fill by pursuing SGM grant funding for monitoring wells in the LPVB.
BA-12	Bob Abrams	Editorial	--	ES-2	--	*Groundwater elevations central ELPMA near the CMWD ASR well field*	Suggested addition in red text: Groundwater elevations in central ELPMA near the CMWD ASR well field	Revised
BA-13	Bob Abrams	Editorial	--	ES-4	--	*groundwater levels in the WLPMA should be maintained at elevations that are high enough to not inhibit the ability of the Oxnard Subbasin to prevent net landward migration of the saline water impact front*	Can this be re-written? This is expressed more clearly on page 17 as "…groundwater levels, significant and unreasonable loss of groundwater in storage, and, in the WLPMA, will not prevent the Oxnard Subbasin from achieving its sustainability goal"	This is a quote from the GSP and cannot be revised.
BA-14	Bob Abrams	Editorial and Technical	--	ES-4	--	*The largest administrative uncertainty is related to how the LPVB Judgment will impact FCGMA's ability to implement the GSP and sustainably manage the LPVB,*	This is a subjective comment and could be deleted. Or the red text could be added. Suggest this document should focus on technical uncertainties rather than administrative. "The largest administrative uncertainty is related to how the LPVB Judgment will impact FCGMA's ability to implement the GSP and sustainably manage the LPVB,"	This evaluation is required, under SGMA, to cover both the technical and administrative implementation components as both impact the ability of an agency to successfully implement the GSP. "Administrative" has been added to the sentence as suggested.
BA-15	Bob Abrams	Technical	--	10	--	*Groundwater elevation was not measured in well 02N20W12MMW1 in water year 2024*	Is it worth noting the reason why the elevation was not measured in this key well? Leaving it as unexplained reduces the robustness of data reporting.	Noted. FCGMA will work to include field notes, as appropriate, in the future.

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BA-16	Bob Abrams	Technical	--	11	Table 2.2		The Table would be stronger if there was a column or note explaining why key wells were not measured, otherwise it looks like poor groundwater management – there are lots of '-' cells indicating data not collected, which is obviously disappointing.	Same as above.
BA-17	Bob Abrams	Editorial	--	13	FCA third paragraph	*Fall groundwater elevations decreased ~~from~~ by less than a foot to 48 feet*	To avoid confusion - the 'from' in the sentence could be read as ft msl, when the intention is to show the change in elevations. Previous paras and next sentence are clearer.	Revised
BA-18	Bob Abrams	Technical	--	13	GCA	*Sufficient measurements were not collected by the monitoring agency to evaluate the change in groundwater elevation for fall 2015 to fall 2023 and spring 2015 to spring 2024.*	Explain the reasons and note that it remains an area of uncertainty? Otherwise, it looks like it is being glossed over.	The text has been revised to not that this remains an area of uncertainty.
BA-19	Bob Abrams	Editorial	--	15	--	*Fall 2023 groundwater elevations were below the 2025 interim milestones in ~~the~~ two of the key wells in the WLPMA*	typo	Revised
BA-20	Bob Abrams	Technical	--	19	1st paragraph	*The lack of measurements at these two wells creates data gaps in the characterization of groundwater conditions within the LPVB.*	Is there any proposal to replace these two key wells with new or other wells? It would counterbalance the negative.	Yes. FCGMA is investigating whether these wells can still be used or need to be replaced.
BA-21	Bob Abrams	Editorial and Technical	--	22	Table 2-4b	--	Title of last "Outflow" column is "Subsurface flow to the ELPMAa" Footnote "a" states, "Represents simulated underflows from the East Las Posas Management Area" Do these contradict? Footnote should say "to"? With respect to flow from WLPMA to ELPMA, reference Section 5.1.1 because new finding and still being evaluated.	Table header has changed and clarification has been added to the footnote.
BA-22	Bob Abrams	Editorial	--	23	Table 2-4c	--	First column of "Outflow" is "Outflow to PV1" Should that be PVB?	Revised
BA-23	Bob Abrams	Technical	--	26	Table 2-6	--	Column labeled "Aquifer" has many instances of "Unknown" Can the aquifer be ascertained by well depth, well completion data, local stratigraphy, well chemistry etc? Collecting data from wells without knowing the aquifer diminishes the value of that data. Doing statistics on data of unknown provenance is questionable/not robust	Table has been corrected to reflect the designations in the GSP.
BA-24	Bob Abrams	Technical	--	28	4th paragraph ELPMA groundwater quality	*While recent data doesn't suggest a link between groundwater quality degradation and groundwater production during the evaluation period*	Increasing trends are noted in a number of wells. While the conclusion is that there is no link between increasing trends and GW production, there is a notable absence of explanations for the increasing trends. If not GW production, then what local conceptual site model is postulated to cause the increases?	There are natural variations in water quality that can occur without being influenced by groundwater production. The key to determining whether groundwater production is causing, or exacerbating, degradation of groundwater quality is to look for both spatial and temporal trends in water quality samples. There are no consistent spatial and temporal trends that suggest water quality degradation is occurring as a result of groundwater production in the LPVB.
BA-25	Bob Abrams	Technical	--	28	2.5.2.1 WLPMA	*TDS concentration data do not indicate that groundwater production since 2015 has caused degradation of groundwater quality*	The previous sentence suggests increases are occurring in wells completed in the USP, but not in the FCA/GCA. Would a hypothetical conceptual model be that groundwater production is pulling higher TDS water down from the USP and that there is a link? What is the TDS of USP groundwater?	The previous sentence was deleted from the text. There are not enough wells screened in the USP to generalize the trends. The TDS concentrations are presented in Figure 2-19.
BA-26	Bob Abrams	Editorial	--	40	3.1.2.3.2 last sentence	*A formal agreement to ensure future maintenance of these non-native flows will be evaluated ~~as~~ through the Basin Optimization Plan.*	typo	Revised
BA-27	Bob Abrams	Technical	--	41	Table 3-1	*Estimated Accrued Benefits at Completion: Recovery of groundwater levels that have contributed to seawater intrusion in the Oxnard Subbasin.*	Is not the biggest benefit of reduced groundwater production the reduced possibility of adverse effects, rather than a specific effect in Oxnard Subbasin?	Agreed. Revised.
BA-28	Bob Abrams	Technical	--	51	4.1.1.1.	*Projects have been identified to install additional monitoring wells and transducers in existing wells that would address data gaps in the ELPMA*	Why none in the WLPMA?	Monitoring wells were also proposed for the WLPMA (See Section 3.2.4 and 3.2.5). Typo in the text has been revised from "ELPMA" to "LPVB."
BA-29	Bob Abrams	Editorial	--	64	4.3.2.3	*Between 2003 and 2022, recycled water in the ELPMA was used exclusively for municipal and industrial uses.*	Missing word?	Revised
BA-30	Bob Abrams	Editorial	--	70	5.2.1.3	*climate change factors ~~.~~, with the noted exception that*	typo	Revised
BA-31	Bob Abrams	Editorial	--	73	5.2.2	*...model runs that resulted in: (1) no net flux of seawater into either the UAS or LAS of the Oxnard Subbasin, ~~;~~*	typo	Revised
BA-32	Bob Abrams	Technical	--	226 and 228	Figures 5-23a, b	--	Why are the simulated hydrographs shifted by -60 and +70 feet?	The starting elevations of the model simulations differed from the observed elevations. Therefore the simulations were shifted to match the observed data.
BA-33	Bob Abrams	Technical	--	73	5.2.2	*Due to the connection between the WLPMA and Oxnard Subbasin, the sustainable yield was evaluated using the model runs that resulted in: (1) no net flux of seawater into either the UAS or LAS of the Oxnard Subbasin,, (2) no landward migration of the saline water impact front in the Oxnard Subbasin, and (3) no chronic lowering of groundwater levels in WLPMA.*	Understood that the subbasins are connected, but shouldn't the focus of sustainability be on the LPVB? The numerous particle tracking figures don't even show the LPVB. What is a LPVB stakeholder supposed to think about this?	This is the same approach that was used in the GSP. The particle tracks are presented to show the modeled influence of each scenario on seawater intrusion. These are relevant to the WLPMA, which is included within the model domain because it is hydrogeologically connected to the adjacent Oxnard Subbasin.
BA-34	Bob Abrams	Editorial	--	89	--	*No New Projects Scenario Model Results*	Should this be 'Arundo Removal Scenario Model results'?	Text has been revised to "Projects Scenario"

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BA-35	Bob Abrams	Technical	--	97	6.2.2.	*the existing monitoring network in the LPVB is sufficient to document groundwater and can be used to document progress toward the sustainability goals for the LPVB.*	The loss of key well monitoring wells has not really been addressed – either the GSP had too many key wells, or this statement isn't really true?	The GSP identified an appropriate number of key wells. However, as discussed above, additional wells with known screen intervals would improve the monitoring network. This is a data gap that FCGMA has sought to fill by pursuing SGM grant funding for monitoring wells in the LPVB. Additionally, 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 that could be used to install additional dedicated monitoring wells and transducers.
BA-36	Bob Abrams	Editorial and Technical	--	98	6.2.2.1	*The removal of 02N21W16J03S limits characterization of groundwater conditions in the eastern part of WLPMA, where groundwater elevations are influenced by operations in the Oxnard Subbasin*	Typo. Also, are GW elevations in the eastern part of WLPMA influenced by Oxnard? More likely wells in western part of WLPMA?	Revised. Well is in the western WLPMA, not the eastern WLPMA.
BA-37	Bob Abrams	Technical	--	98	6.2.2.1	*As noted above, FCGMA anticipates evaluating projects that help to fill these critical data gaps as part of the Basin Optimization Plan*	Insufficient urgency demonstrated? Only one new well installed since 2019.	Text has been revised and a sentence added to discuss seeking funding.
BA-38	Bob Abrams	Editorial	--	107	8.3	*with FCGMA holding regular meetings ~~with~~ to coordinate on projects*	typo	Revised
BA-39	Bob Abrams	Editorial	--	110	9.3	*Because the Judgment is still being implemented and subject to appellate court review, the effect of the Judgment on FCGMA's implementation of the LPV GSP and sustainable management of the LPV Basin is uncertain at this time.*	Not clear what this sentence achieves? Suggest rewording or deleting (ame as p ES-2, above)	This sentence is to advise DWR that there may be impacts to the implementation of the LPVB GSP that are not currently understood. Future GSP evaluations may need to explain how implementation has differed from what is presented here, and the reasons why.
BA-40	Bob Abrams	Editorial	--	112	10	*~~Revisions~~ Reductions to the monitoring network, including the key well network*	The word "reduction" is a more accurate representation of facts	"Revisions" is the term used in DWR's guidance document.
TM-1	Tony Morgan	Editorial	--	ES-1	Table ES-1, 4th row, last column	--	subsidence is not discussed in Section 7.2	Revised
TM-2	Tony Morgan	Technical	--	7	2.2.1.1	*prevent chronic lowering of groundwater levels*	is chronic lowering of water levels currently a WLPMA condition? That message doesn't seem to be a prevalent message throughout the document.	As stated in the evaluation, the primary sustainability goal identified in the GSP for the LPVB is to "maintain a sufficient volume of groundwater in storage in each management area so that there is no significant and unreasonable net decline in groundwater or storage over wet and dry climatic cycles." Additionally, the GSP states that "the criterion used to define undesirable results for chronic lowering of groundwater levels in the eastern part of the WLPMA is groundwater levels that indicate a long-term decline over periods of drought and recovery." This has been added to the discussion of the sustainability goal in section 2.1
TM-3	Tony Morgan	Technical	--	7	2.2.1.2, first paragraph	*to limit the area of the FCA that would convert from confined to unconfined conditions with declining water levels,*	the undesirable condition is a conversion of the aquifer from confined to unconfined. The following paragraph moves from a discussion of the aquifer transitioning from confined to unconfined, to an individual well?	The second paragraph of section 2.2.1.2 and Table 2-1 identify wells located within areas of the WLPMA subject to aquifer conversion to evaluate potential impacts to well operators.
TM-4	Tony Morgan	Technical	--	7	2.2.1.2, second paragraph	*would result in projected groundwater elevations that are below the top of the well screen in nine wells*	declines in water levels to below the top of screen does not necessarily equate to the dewatering of the aquifer. Not clear how this analysis helps assess the potential for CONF-UNCONF conversion. A more powerful analysis would be to determine the tops of the confined aquifer and then compare to a declining water level.	The purpose of this review was to look at impacts to stakeholders within the area that was already designated as prone to conversion in the GSP.
TM-5	Tony Morgan	Editorial	--	24	2.3.2.1, Lower Aquifer System	*approximately 32,970 AF since 2015 (Table 2-5)*	value doesn't match Table 2-5	Revised
TM-6	Tony Morgan	Editorial	--	24	Table 2-5., West Las Posas / LAS row	--	-34,780+1,810 = -32,970	Corrected.
TM-7	Tony Morgan	Technical	--	26	2.5.1	*describe efforts to evaluate the connection between groundwater production and groundwater quality*	Was this accomplished in the document?	This effort is described in Section 2.5.1 and its subsections. The text has been expanded to better characterize the work done to address DWR's recommended corrective action.
TM-8	Tony Morgan	Technical	--	26	2.5.1	*progress made toward evaluation of the causal relationship referenced in the GSP.*	Where is this addressed in the document?	This effort is described in Section 2.5.1 and its subsections. The text has been expanded to better characterize the work done to address DWR's recommended corrective action.
TM-9	Tony Morgan	Technical	--	28	2.5.1.2, last paragraph	*While recent data doesn't suggest a link between groundwater quality degradation and groundwater production during the evaluation period,*	Where are these data presented?	These data are presented in Section 2.5.1 and its subsections. The text has been expanded to better characterize the work done to address DWR's recommended corrective action.
TM-10	Tony Morgan	Technical	--	32	2.6.2	*critical infrastructure*	What are the criticial infrastructure? Their location(s) are not shown on Fig 2-29.	Text has been revised to note that no critical infrastructure has been identified in the LPVB that could be impacted by land subsidence related to groundwater pumping.

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TM-11	Tony Morgan	Editorial	--	35	3	*Both the Basin Optimization Plan and Basin Optimization Yield Study are developed by FCGMA, as Watermaster for the LPVB, with consultation, review, and recommendation from the LPVB PAC and TAC.*	Change to: "Both the Basin Optimization Plan and Basin Optimization Yield Study are planned to be developed by FCGMA, as Watermaster for the LPVB, with consultation, review, and recommendation from the LPVB PAC and TAC."	Revised to "are being"
TM-12	Tony Morgan	Technical	--	37	3.1.1.1.3, Impacts to beneficial uses and users	*potential groundwater-surface water connections.*	these connections are not highlighted/identified in this document. Why mention them here?	Deleted.
TM-13	Tony Morgan	Technical	--	39	3.1.2.1.2, Expected Benefits	*prevent declines in groundwater elevation, loss of storage, and land subsidence by*	These benefits are logical, but are they actually needed to lessen declines in groundwater elevations, loss of storage, or land subsidence. Other sections in this document do not identify undesirable results associated with them (e.g., subsidence).	Revised to "undesirable results"
TM-14	Tony Morgan	Technical	--	39	3.1.2.1.2, Impacts to beneficial uses and users	*chronic lowering of groundwater levels,*	is chronic lowering of groundwater a risk in the WLPMA?	Chronic lowering of groundwater levels is a risk in the WLPMA.
TM-15	Tony Morgan	Editorial	--	40	3.1.2.3.2, Realized Benefits, second paragraph	*A formal agreement to ensure future maintenance of these non-native flows will be evaluated ~~as~~ through the Basin Optimization Plan.*	typo	Revised.
TM-16	Tony Morgan	Editorial	--	41	Table 3-1, first row, second column	*Reduce Groundwater production by monitoring and imposing quantitative limits on pumpers; with governing authority from the FCGMA Board as the Watermaster .*	recommend adding red text	Added.
TM-17	Tony Morgan	Editorial	--	42	3.2.1.1	*decrease groundwater demand in the LPVB by 2,300 AFY.*	section below says groundwater demand would be decreased by 500 AFY	The text and tables have been revised.
TM-18	Tony Morgan	Editorial	--	42	3.2.1.2, Expected Benefits	*It is estimated that implementation of this project would decrease groundwater demand in the LPVB by approximately 500 AFY.*	paragraph above says groundwater demand would be decreased by 2,300 AFY	The text and tables have been revised.
TM-19	Tony Morgan	Technical	--	43	3.2.1.2, Expected Benefits	*which directly addresses undesirable results associated with degraded water quality,*	what degraded water quality impacts are attributable to the GSP's management of the basin?	Text has been revised to note the origin of the water quality degradation.
TM-20	Tony Morgan	Technical	--	43	3.2.1.2, Expected Benefits	*reducing groundwater demands in the LPVB.*	how does the pumping of groundwater to supply the desalter achieve a reduction in groundwater demands?	Deleted.
TM-21	Tony Morgan	Technical	--	43	3.2.1.2, Impacts to beneficial uses and users	*helping to prevent groundwater elevation declines*	the desalter needs a source of water to treat - groundwater. Not clear how this project reduces groundwater demand and therefore prevents groundwater elevation decline.	Deleted.
TM-22	Tony Morgan	Technical	--	44	3.2.3.1	*would provide up to 2,000 AFY of recharge.*	how much of the 2,000 AFY of recharge would have normally been recharged downstream of the percolation ponds or in the PVB? Is this expected to be 2,000 AFY net of the "normal" recharge?	The initial benefit analysis was provided by VCWWD-1, the project proponent. The answers to your question should be explored in more detail when conducting further feasibility analysis of this specific project, which is outside the scope of the GSP evaluation.
TM-23	Tony Morgan	Technical	--	45	3.2.4.1	*would provide data on whether the vegetation in the riparian corridor relies on groundwater or soil moisture from infiltrating surface water.*	other sections stated that vegetation is not dependent on groundwater. This seems to be backtracking on the conclusions offered elsewhere.	Revised
TM-24	Tony Morgan	Editorial	--	54	4.3.2.1	*approximately 35,100 AFY of groundwater*	Recommend changing to "...an average of approximately 35,100 AFY of groundwater..."	Revised
TM-25	Tony Morgan	Technical	--	77	Table 5-2, first column, second row	*Seawater Flux into the Oxnard Subbasin* [b]	it is a little misleading to show the SWI values as a single number when in reality the modeling results have an error bar associated with them (e.g., 500 AFY +/-200 AFY). The single value presented in the table suggests a more exact rate than we have data to support. Can error estimates be added to the table?	Uncertainty has been added to the footnote of the table.
TM-26	Tony Morgan	Editorial	--	77	Table 5-2, footnotes	--	Last footnote should be 'd'	Revised
TM-27	Tony Morgan	Technical	--	98	6.2.2.3	*13 wells that were to be monitored for groundwater quality are no longer monitored for groundwater quality.*	Seem appropriate to provide the reader with some idea of why so many wells are no longer monitored. Were the wells destroyed, landowner access denied, data determined to be redundant, monitoring entity dropped these wells from their suite of monitored wells, or ??.	Revised wording to reflect correction from CMWD
TM-28	Tony Morgan	Technical	--	99	6.4	*monitor subsidence*	Is it anticipated that an annual report will be produced? Will the report address inferred land surface movement near critical infrastructure? If so, what infrastructure?	This will be reported in the regular GSP annual report. Thus far, no critical infrastructure has been identified by stakeholders in the LPVB that may be subject to significant and unreasonable land subsidence that substantially interferes with surface land uses.
TM-29	Tony Morgan	Editorial	--	103	7.1.3	*As described in Section 3.1, Evaluation of Projects and Management Actions, the Judgment adjudicated water rights in the basin and established an allocation system based on those water rights. The Judgment allocations supersede the allocations developed and adopted by FCGMA in 2019.*	This paragraph seems to fit better in 7.1.2 Extraction Allocations.	Revised

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TM-30	Tony Morgan	Technical	--	110	9.3, Las Posas Valley Water rights Coalition, et al. v. Fox Canyon Groundwater Management Agency, Santa Barbara Sup. Ct. Case No. VENC100509700	*adopts a physical solution that requires FCGMA to prepare new studies and reports designed to maintain an annual operating yield for the LPVB at 40,000 AFY*	This GSP puts the sustainable yield at ~27K-34K AFY with projects. The judgment requires a sustainable yield of 40K AFY. What is the GSA (Watermaster?) doing to get to the 40K AFY value? Was this discussed in the GSP?	FCGMA is the groundwater sustainability agency (GSA) and the special act water agency designated by the Legislature to manage and conserve the LPV Basin's groundwater resources. (Judgment, § 3.3.) The judgment appoints FCGMA to be Watermaster for the LPV Basin. (Judgment, § 3.3.) "[T]he Judgment unites the FCGMA's role as the GSA for the Basin with its responsibilities as Watermaster" and tasks FCGMA to "continue in its role as the GSA for the Basin, fulfilling its SGMA statutory obligation, and will simultaneously integrate those regulatory responsibilities and authorities with its role as Watermaster under the Judgment." (Judgment, § 3.3.) The judgment provides "to the extent that it is feasible and cost-effective, Watermaster shall seek to augment the Basin Optimization Yield, and ultimately the Sustainable Yield, to be no less than 40,000 AFY." (Judgment, § 4.9.1.2). The judgment requires the Watermaster to prepare a Basin Optimization Plan on a five-year basis to identify the projects "that are likely to be practical, reasonable, and cost-effective to implement prior to 2040 to maintain the Operating Yield at 40,000 AFY or as close thereto as achievable." (Judgment, § 5.3.2.2). Potential projects are identified and discussed in section 3.2 of the GSP Evaluation.
TM-31	Tony Morgan	Technical	--	Appendix A, A-1	A.1	*identify specific locations where Arroyo Simi-Las Posas is connected to the underlying aquifer and*	Is there a map or ?? showing these locations?	There is no current map showing these locations
TM-32	Tony Morgan	Technical	--	Appendix A, A-2	A.2, first paragraph on page	*recharge of the surface water discharges*	Helpful to reader to identify these surface water discharges. Can the surface water discharges be quantified (e.g., time series)? What values were used for the groundwater model?	Text has been revised.
TM-33	Tony Morgan	Technical	--	Appendix A, A-2	A.3, last sentence in first paragraph	*This indicates that groundwater production in the principal aquifers of the ELPMA has not impacted the groundwater level in the shallow alluvial aquifer adjacent to the Arroyo near well MMW-1.*	This implies limited interconnection between the principal and shallow aquifers. Is this conclusionary statement consistent with the findings from the groundwater flow model? If so, suggest stating the model is supportive of these observations. If not, then why the difference.	The sentence has been modified to be specific to the observation. The intent is not to say that the two are disconnected, just that the increased pumping over the last 15 years hasn't impacted the water levels in the shallow aquifer. There are multiple potential reasons for the pumping not to have impacted the water levels. These could be explored in the future if needed.
TM-34	Tony Morgan	Technical	--	Appendix A, A-2	A.4, first paragraph	*interconnected surface water bodies*	Were the interconnected surface water bodies identified?	Specific reaches of Arroyo Simi-Las Posas may be interconnected, but no recent work has been done to verify this. FCGMA sought funding to install additional monitoring wells to update the understanding of the connection between the aquifers, but did not receive funding. Installation of additional monitoring wells and updating the understanding of gaining and losing reaches of Arroyo Simi-Las Posas are projects that should be pursued over the upcoming years.
TM-35	Tony Morgan	Editorial	--	Appendix A, A-2	A.4, first paragraph	*has not occurred in relation to current groundwater production, although this could occur in the future if upstream surface water discharges decrease.*	is this sentence saying that depletions of interconnected surface waters due to pumping could occur if upstream surface water discharges decrease? Suggest splitting the sentence into two. Add a period after "...groundwater production." Create a new sentence to say "Interconnected surface water bodies could occur in the future if upstream surface water discharges decrease."	Text has been revised to state "Depletions of interconnected surface water bodies could occur in the future if upstream surface water discharges decrease."
CT-1	Chad Taylor	Editorial	--	1	Table 1-1, fourth row, second column	*As a result, FCGMA anticipates approximately more flow in Arroyo Simi-Las Posas than previously assumed for the GSP*	Is this a typo, or should a value of additional flow be included here?	Typo - "approximately" has been removed
CT-1	Chad Taylor	Technical	--	1	Table 1-1	*Infrastructure Improvements to Zone Mutual Water Company's water delivery system*	This project may need to be modified based on feedback from Bryan Bondy regarding ZMWC's ability to finance improvements. TAC recommendations on the projects for the Basin Optimization Plan include changing this to a Basin-wide feasibility study to increase transfers between management areas.	Noted. Thank you for your comment.
CT-1	Chad Taylor	Technical	--	2	Table 1-1	*Projects to Address Data Gaps, Installation of Additional Groundwater Monitoring Wells and Installation of Additional Groundwater Monitoring Wells*	These are important projects that should be advanced quickly. See later comments on monitoring adequacy.	Agreed.
CT-1	Chad Taylor	Editorial	--	4	2.1, second paragraph on page	*At the time the GSP was prepared, the groundwater elevations were below the minimum threshold groundwater elevations in ~~the at~~ four of the five key wells in WLPMA, the only key well in the Epworth Gravels Management Area, and one well in the ELPMA.*	Typo	Revised
CT-1	Chad Taylor	Technical	--	7	2.2.1.2, second paragraph	*The depth and groundwater production rates from the wells in this area indicate that they are agricultural wells and are not domestic or de minimis wells that produce less than 2 acre-feet per year (AFY).*	Recommend showing the all the data included in and results of this analysis in figures and tables. Table 2-1 shows only perforated interval depths, not production rates that would distinguish domestic wells from those for other uses.	Well use has been added to the table
CT-1	Chad Taylor	Technical	--	8	Table 2-1, 6th column	--	18 percent of wells (4 of 22) with reduced capacity seems high	Noted. Thank you for your comment.
CT-1	Chad Taylor	Technical	--	8	Table 2-1, 7th column	--	2 wells out of 22 is 9%. That is a fairly large percentage of wells going dry.	Noted. Thank you for your comment.

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CT-1	Chad Taylor	Technical	--	8	2.2.1.2, second paragraph on page	*Loss of production at the minimum threshold groundwater elevations represents a loss of between 1% and 3% of the total production from the management area.*	The DWR Recommended Corrective Action requested discussion of the effects of the MTs and MOs on beneficial uses and users. This analysis only discusses the MTs. Additionally, contextualizing the reductions in production ability from these wells in the context of the entire production from the management area may not meet DWR expectations regarding effects on beneficial users. Recommend including discussion of effects on individual well owners. Also, will there be a dry well mitigation program in case wells do go dry?	A discussion of the impacts at the MOs has been added to the text. The discussion of potential impacts refers back to the selection of the 20% storage loss threshold evaluated in the GSP, as a level of significance for the FCGMA board. Development of a dry well mitigation program is a good suggestion for future evaluation.
CT-1	Chad Taylor	Technical	--	9	2.2.1.3, first paragraph	*As groundwater elevations decline in the Epworth Gravels aquifer, groundwater users in this management area rest their Epworth Gravels aquifer wells and rely on water from the FCA instead.*	Can this practice be incorporated into a management action?	This practice is covered under Management Action Number 1 in the GSP - Reduction in Groundwater Production.
CT-1	Chad Taylor	Editorial	--	9	2.2.1.3, second paragraph	*The GSP reported on groundwater conditions through fall 2015. The change in water levels since 2015 varies geographically within the LPVB, reflecting both the influence of groundwater extraction and the availability and extent of groundwater recharge in the WLPMA, ELPMA, and Epworth Gravels Management Area.*	This paragraph seems out of place. Is it supposed to follow the header for 2.2.2?	Moved.
CT-1	Chad Taylor	Editorial	--	9	2.2.2.1 Upper San Pedro Formation	*There are no key wells screened in the USP because it is not a* ***primary*** *aquifer…*	Should primary be principal?	Revised
CT-1	Chad Taylor	Technical	--	9	2.2.2.1 Fox Canyon Aquifer	*In the western part of the WLPMA, adjacent to the Oxnard Subbasin, fall 2023 and spring 2024 groundwater elevations in the FCA were approximately 55 to 35 feet higher than they were in fall 2015 and spring 2015, respectively (Figure 2-7, Fox Canyon Aquifer – Groundwater Elevation Changes from Fall 2015 to 2023, and Figure 2-8, Fox Canyon Aquifer – Groundwater Elevation Changes from Spring 2015 to 2024). Groundwater elevations in this part of the WLPMA were also higher than they were in fall 2019, the start of the current evaluation period (FCGMA 2021). Groundwater elevation recoveries in the western WLPMA since 2015 reflect the influence of UWCD's recharge operations in the Forebay Management Area of the Oxnard Subbasin, which promoted groundwater elevation recoveries in the Oxnard Subbasin of approximately 120 feet between 2015 and 2024 (FCGMA 2024a).*	These statements are based solely on one monitoring well at the extreme western end of the WLPMA. That data limitation should be discussed somewhere.	Text was added to further note the limitations of the data. The figures are presented with the text so that all readers can see the data collected and used to develop the discussion in the text.
CT-1	Chad Taylor	Technical	--	10	2.2.2.1, first paragraph on page	*In contrast, groundwater elevations in the eastern part of the WLPMA were lower in the fall of 2023 than they were in fall 2015 (Figures 2-7)8. The largest groundwater elevation decline measured over this period was at well 02N20W06R01S, where the fall 2023 groundwater elevation was approximately 80 feet lower than fall 2015 (Table 2-2, Water Year 2024 Groundwater Elevations at Key Wells in the Las Posas Valley Basin; Figures 2-7 and 2-8). Groundwater elevation declines in the eastern WLPMA reflect ongoing groundwater production in an area with limited groundwater recharge.*	The lack of consistent monitoring for comparing water levels may be the cause of the apparent difference between fall and spring comparisons. Inconsistent monitoring makes tracking sustainability very challenging, especially when there are so few Key Wells in the network. This problem may be skewing the assessment of sustainability and should be addressed immediately by adding dedicated monitoring wells that the FCGMA/Watermaster monitors or uses transducers to reliably measure water levels regularly.	Noted. The text is referencing a difference in the geographic water level changes in the fall, only. It is not comparing the difference between the fall and spring changes, because of the lack of data. The text has been revised to clarify this distinction.
CT-1	Chad Taylor	Technical	--	10	2.2.2.1 Grimes Canyon Aquifer	*Two wells, 02N21W28A02S and 02N21W22G01S, had groundwater elevations measured in both spring 2015 and spring 2024.*	Spring to spring declines with no fall comparison due to inconsistent monitoring should raise concern.	Noted. Thank you for your comment.
CT-1	Chad Taylor	Editorial	--	14	2.2.3.1, first paragraph	*The GSP defined interim milestones for the key wells with groundwater elevations below the measurable objectives, so that groundwater elevations would reach the measurable objectives by 2040 (FCGMA 2019).*	Recommend referencing relevant section discussing Interim Milestones.	Section reference has been added
CT-1	Chad Taylor	Technical	--	14	2.2.3.1, second paragraph	*FCGMA has relied on other agencies for monitoring data but recognizes the need for more consistent monitoring of groundwater elevations in the WLPMA*	This should be prioritized using available funding sources, not waiting for grant funding as alluded to in other sections. Has the FCGMA considered the Technical Support Services available through DWR? Those may not be available now that the Basin is adjudicated, but worth asking about.	The Watermaster will work with partner agencies to formalize an agreement to monitor critical wells and will continue to pursue funding mechanisms to install additional dedicated monitoring wells, if possible. The referenced sentence is out of place here though and has been deleted.
CT-1	Chad Taylor	Editorial	--	14	2.2.3.1, second paragraph	*anticipates that groundwater elevations will rise between 2025 and 2040 with the implementation of projects and management actions in the WLPMA that are consistent with the GSP and Judgment.*	This seems a weak statement without further explanation of the mechanisms for increased groundwater elevations. Specifically, "anticipates' and "will rise" are very passive.	Agreed that this sentence is out of place in this section and has been deleted.
CT-1	Chad Taylor	Editorial	--	14	2.2.3.2	*In 2015, the end of the GSP reporting period, groundwater elevations in the WLPMA were above* ~~*than*~~ *the minimum threshold water levels at four of the five key wells in the management area (FCGMA 2019).*	Typo	Revised

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CT-1	Chad Taylor	Technical	--	15	2.2.3.2, first paragraph on page	*measured in three of the five key wells were measured in three of the five key wells*	40 percent of key wells were not monitored and 2/3 of those that were monitored were below the MT. The importance of more consistent monitoring cannot be stressed highly enough.	The Watermaster will work with partner agencies to formalize an agreement to monitor critical wells and will continue to pursue funding mechanisms to install additional dedicated monitoring wells, if possible.
CT-1	Chad Taylor	Editorial	--	15	2.2.3.2, first paragraph on page	*...minimum thresholds (Table 2-1).*	Table 2-2?	Revised
CT-1	Chad Taylor	Technical	--	15	2.2.3.2, first paragraph on page	*Spring 2024 groundwater elevations were above the minimum threshold groundwater elevations at all of the key wells measured in the WLPMA*	The spring 2024 measurements also included only 60% of Key Wells and the well that was furthest below the MT in fall 2023 was not included.	Noted. Text has been revised where appropriate. As discussed in previous responses, Watermaster will work to formalize agreements with monitoring partners to improve monitoring data.
CT-1	Chad Taylor	Editorial	--	15	2.2.3.3, first paragraph	*Fall 2023 groundwater elevations were below the 2025 interim milestones in the two the key wells*	missing word	Revised
CT-1	Chad Taylor	Editorial	--	15	2.2.3.3, first paragraph	*established interim milestones (Table 2-1).*	Table 2-2?	Revised
CT-1	Chad Taylor	Technical	--	17	2.2.5.3	*gained and updated numerical modeling conducted for this periodic evaluation (see Section 5, Updated Numerical Modeling)* ***suggest*** *that these thresholds are appropriate to prevent undesirable results in the LPVB*	This makes it sound like there is uncertainty regarding the effectiveness of the thresholds. Can this be strengthened, or is there significant uncertainty?	Sufficient uncertainty exists to warrant the use of the qualifier in this statement.
CT-1	Chad Taylor	Technical	--	19	2.2.5.3, last sentence of first paragraph on page	*The lack of measurements at these two wells creates data gaps in the characterization of groundwater conditions within the LPVB.*	SGMA characterizes data gaps as "a lack of information that significantly affects the understanding of basin setting or evaluation of the efficacy of the Plan implementation, and could limit the ability to assess whether a basin is being sustainably managed." Data gaps include not only limited geographic representation, but also monitoring sites that are unreliable. Once identified, as GSA must include a description in the GSP that addresses the data gaps (23CCR §354.38.) As noted above, a plan to address these data gaps should be developed and implemented as soon as possible.	Noted. The Watermaster will work with partner agencies to formalize an agreement to monitor critical wells and will continue to pursue funding mechanisms to install additional dedicated monitoring wells, if possible.
CT-1	Chad Taylor	Technical	--	19	2.3	--	While this section does acknowledge that undesirable results have occurred, it does not appear to address the DWR RCA request for discussion of potential effects of MTs and MOs on beneficial uses and users. Recommend including a discussion to this effect to address the DWR request.	As referenced in the text, the discussion of undesirable results and impacts to beneficial uses and users of groundwater is presented in section 2.2.4 and 2.2.5.2, because the change in storage undesirable results are tied to the groundwater elevation undesirable results.
CT-1	Chad Taylor	Technical	--	22	Table 2-4b	--	Why does this table show the average and not the total change in storage over the period? The sum of the annual changes in storage is a loss of 34,777 AF, which is 3.3 times the average annual inflow to the WLPMA. By comparison, the total change in storage for the ELPMA over the same period was a loss of 2,824 AF, which is only 10% of the average annual inflow to the management area. Recommend including and discussing the change in storage over the period as it represents significant sustained storage decline.	Sum has been added to the table and a sentence has been added to section 2.3.1.2
CT-1	Chad Taylor	Technical	--	24	2.3.2.1, Lower Aquifer System	*During the 2004 through 2010 period, the VRGWFM estimates that groundwater in storage in the LAS increased by approximately 1,810 AF (Table 2-5).*	Please explain this calculation. As presented it appears that the change in storage for the entire period of 2004 through 2010 was an increase of 1,810 AF, but the table makes it appear to be an estimate of annual storage change.	This was discussed in section 2.3.2 and in a footnote to section 2.3.1.2, but the text has been expanded in section 2.3.2 and the footnote has been added to the main text in section 2.3.1.2 for clarity.
CT-1	Chad Taylor	Editorial	--	24	Table 2-5, second row, 6th column	*-35,970*	should this be -32,970 as in the text above?	Revised
CT-1	Chad Taylor	Editorial	--	24	Table 2-5, East Las Posas information	--	Recommend explaining how the values in this table relate to those in Table 2-4c	Table 2-4C includes change storage for all model layers, including the Upper San Pedro Formation. Table 2-5 only reports storage change for the principal aquifers in the model. The text has been revised and expanded to explain the difference.
CT-1	Chad Taylor	Technical	--	26	Groundwater Quality	--	DWR's RCA for water quality included a request to further describe efforts to evaluate connections between groundwater production and quality, including evaluation of the "casual relationship" referenced in the GSP and document details of a process for determining if groundwater management and extraction are causing adverse impacts to groundwater quality. This discussion and documentation do not appear to have been included and neither is there a statement addressing DWR's request.	This effort is described in Section 2.5.1 and its subsections. The text has been expanded to better characterize the work done to address DWR's recommended corrective action.
CT-1	Chad Taylor	Technical	--	27	2.5.1.1	*Water quality in this area has been impacted by historical land uses and is generally tied to groundwater elevation (FCGMA 2019).*	This references the "casual relationship" DWR mentioned, but does not explain the reasons behind the statement or provide any plan for further assessment. Recommend being very careful about statements concerning connections between groundwater elevations and quality without evidence.	This is discussed further in the GSP, which is referenced in the sentence discussed, and specifically refers to the western part of the WLPMA where work was done prior to the GSP to develop the relationship between groundwater quality and groundwater level. The sentence does not apply to the entire LPVB.
CT-1	Chad Taylor	Technical	--	31	2.5.4	*changes in the groundwater quality do not appear to be correlated with decreases in groundwater elevation.*	Section 2.5.1.1. says there is a relationship. See comment on that section.	The text has been revised to distinguish the link between groundwater levels and water quality in the western and eastern portions of the WLPMA.

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CT-1	Chad Taylor	Technical	--	42	3.2.1	--	This project may need to be revised based on recent information presented to the TAC. See TAC Recommendation Report on the Basin Optimization Plan projects.	Noted. The project description was solicited as part of the FCGMA Board project prioritization process that commenced prior to formation of the TAC. The project description provided by the project proponent was used to incorporate the project into the model for the GSP evaluation. Revisions to the project description are planned for the Basin Optimization Plan.
CT-1	Chad Taylor	Technical	--	44	3.2.4	--	Recommend advancing this project as quickly as possible	Noted. Thank you for your comment.
CT-1	Chad Taylor	Technical	--	45	3.2.5	--	Recommend advancing this project as quickly as possible	Noted. Thank you for your comment.
CT-1	Chad Taylor	Technical	--	51	4.1.1.1, second paragraph	*These revisions are described in FCGMA (2024a).*	Please include information regarding the understanding of the LPVB and relevant information about the connection to Oxnard in this document.	The changes described are specific to the Oxnard Subbasin and are more appropriately described in the first periodic evaluation for the Oxnard Subbasin. The reference is provided for the interested reader.
CT-1	Chad Taylor	Technical	--	55	4.3.2.1, Comparison to Projected Groundwater Supplies	*approximately 10% lower than the average annual groundwater extractions over the 2021 and 2022 water years.*	42,400 - 36,100 = 6,300 AFY, and 6,300/42,400 = 15% (14.858).	Revised.
CT-1	Chad Taylor	Technical and Editorial	--	67	5.1.1, third paragraph	*These updates are summarized in FCGMA (2024a).*	Please include all new information relevant to the LPVB in this document	The changes described are specific to the Oxnard Subbasin and are more appropriately described in the first periodic evaluation for the Oxnard Subbasin. The reference is provided for the interested reader.
CT-1	Chad Taylor	Technical	--	68	5.1.1, first paragraph on page	*of the fault. As a result, the Coastal Plain Model simulates subsurface flows from the WLPMA to the ELPMA (Table 2-4c). These modeled flows are not integrated into the modeling conducted for the ELPMA.*	Why are the modeled flows between WLPMA and ELPMA not integrated into the modeling for the ELPMA? This raises a concern that the two LPVB management areas are not being modeled in a similar or complimentary way. The statement implies that the ELPMA model still uses a no flow boundary at the Somis Fault, which would be expected to produce very different flow and water budget results when compared to the Coastal Plain model that has a partial general head boundary along the fault. The potential for flow between ELPMA and WLPMA in the coastal plain model may also have an impact on seawater intrusion in Oxnard, and that potential is not discussed. Recommend reconsidering the disparity in the way the Somis Fault is modeled in the Coastal Plain and ELPMA models.	The Watermaster agrees that reconciliation of the models used could improve the understanding of the impact of management actions and projects in the LPVB and the interconnectedness of the basins. As stated in the next paragraph, "FCGMA anticipates coordinating with UWCD, in consultation with the LPVB TAC, to better coordinate the representation of this boundary between the ELPMA and WLPMA in both LPVB models."
CT-1	Chad Taylor	Technical and Editorial	--	68	5.1.1, third paragraph on page	*A broader discussion of updates to the Coastal Plain Model will be detailed in a technical memorandum prepared by UWCD.*	Where is this document? This seems like important information for the LPVB 5-Year GSP Evaluation	UWCD is currently working on the supplemental documentation to cover the changes made since the GSP. As of the time this comment response matrix was prepared, UWCD has not yet finalized this supplemental documentation.
CT-1	Chad Taylor	Technical and Editorial	--	68	5.1.2.1	*The ELPMA model extension, and validation, will be detailed in a technical memorandum prepared by FCGMA.*	When will this be available? Shouldn't this be available for committee review?	The tech memo was released with the final periodic evaluation.
CT-1	Chad Taylor	Editorial	--	69	5.1.2.1, first sentence on page	*simulation of future groundwater conditions.*	Sentence fragment	Not found in document.
CT-1	Chad Taylor	Technical	--	73	5.2.2	--	How do flows between WLPMA and ELPMA differ in the two models?	This is discussed in section 5.1.1
CT-1	Chad Taylor	Technical	--	78	5.2.2.1.3, No New Projects Scenario Assumptions	--	The percent change referenced for PVB is not consistent with the annual pumping values presented in the assumption summaries. I suspect this is a function of how the information is presented, but it should be checked and the text or percentages/volumes corrected. For instance, in NPP1 the summary says "a 20% reduction in both aquifer systems in the PVB and WLPMA" then references production volumes of "13,200 AFY in the PVB, and 10,800 AFY in the WLPMA." Comparing 13,200 AFY for NPP1 in the PVB to 13,900 AFY in Future Baseline shows a change of -5%, not 20%. All other scenarios have similar results when compared to baseline.	The 20% reduction references a 20% reduction in demand in the numerical model. However, in the Oxnard and Pleasant Valley basin, reduced demand may not result in a 20% reduction in groundwater production as surface water is used conjunctively to meet demand.

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CT-1	Chad Taylor	Technical	--	90	5.2.3.1, Sustainable Yield without Future Projects	*All three simulations performed under the NNP Scenario avoided chronic lowering of groundwater levels in the WLPMA and reduced seawater intrusion in the LAS of the Oxnard Subbasin during the 30-year sustaining period and resulted in net freshwater loss from the UAS of the Oxnard Subbasin to the Pacific Ocean. Therefore, the simulation with the highest overall production rate, that also minimized impacts from adjacent basins, was identified as the best estimate of the sustainable yield of the Oxnard Subbasin, PVB, and WLPMA, in the event that no new future projects are implemented in each basin. The simulation with the highest total groundwater production rate from this scenario was NNP3 – under this simulation, an average of approximately 11,400 AFY of groundwater was pumped from the WLPMA (Section 5.2.2.1.3 No New Projects Model Scenario). This estimate of the sustainable yield is approximately 1,100 AFY lower than the estimate presented in the GSP (FCGMA 2019). Applying the estimate of sustainable yield uncertainty calculated during the development of the GSP for the sustaining period suggests that the sustainable yield of the WLPMA may be as high as 12,600 AFY or as low as 10,200 AFY (FCGMA 2019).*	This appears to be an arbitrary means of estimating sustainable yield. The values listed are simply the results of one of several production reduction scenarios not an assessment of the maximum "amount of groundwater that can be withdrawn annually without causing undesirable results." (DWR BMP for Sustainable Management Criteria, November 2017). The SMC BMP also indicates that sustainable yield should be a single value, not a range as presented here. Please provide more information regarding the methods for estimating uncertainty in the sustainable yield estimate.	The sustainable yield of the WLPMA is based on the minimized production reduction scenario that resulted in no net seawater intrusion in the Oxnard Subbasin over the sustaining period. This is based on the method used in the GSP. But the method used to estimate sustainable yield in the GSP evaluation improves on the previous method, as requested by stakeholders, by conducting iterative model runs to reach a sustainable pumping rate for the Oxnard Subbasin, Pleasant Valley Basin, and WLPMA, collectively, as these basins are hydrogeologically interconnected. The Watermaster welcomes suggested improvements to the modeling and sustainable yield calculation for discussion and potential incorporation into the BOY and future GSP evaluations. The GSP evaluation includes both a single sustainable yield estimate, by management area, and an uncertainty range. The range of sustainable yield presented in the GSP evaluation represents the uncertainty bounds around the single sustainable yield value. A detailed description of the quantitative uncertainty analysis is provided in section 2.4.5 of the GSP. This evaluation does not change or update that uncertainty analysis.
CT-1	Chad Taylor	Technical	--	90	5.2.3.1, Sustainable Yield with Future Projects	--	See comment on sustainable yield without future projects regarding how to define sustainable yield.	Please see response to comment on sustainable yield without future projects above.
CT-1	Chad Taylor	Technical	--	90	5.2.3.1, Sustainable Yield with Future Projects, third paragraph	*the sustainable yield of the WLPMA may be as high as approximately 13,040 AFY or as low as 10,640 AFY.*	Please explain how this range was estimated.	The detailed description of the quantitative uncertainty analysis is provided in the GSP.
CT-1	Chad Taylor	Technical	--	90	5.2.3.1, Sustainable Yield with UWCD's EBB Water Treatment Project	--	See comment on sustainable yield without future projects regarding how to define sustainable yield.	Please see response to comment on sustainable yield without future projects above.
CT-1	Chad Taylor	Technical	--	91	5.2.3.1, Sustainable Yield with UWCD's EBB Water Treatment Project, second paragraph on page	*approximately 14,700 AFY or as low as 12,300 AFY.*	Please explain how this range was estimated.	The detailed description of the uncertainty calculation is provided in the GSP.
CT-1	Chad Taylor	Technical	--	91	5.2.3.2, Sustainable Yield without Future Projects	--	See comment on WLPMA sustainable yield without future projects regarding how to define sustainable yield.	Please see response to comment on sustainable yield without future projects above.
CT-1	Chad Taylor	Technical	--	91	5.2.3.2, Sustainable Yield without Future Projects, second paragraph	--	Please explain how this range was estimated.	The detailed description of the uncertainty calculation is provided in the GSP.
CT-1	Chad Taylor	Technical	--	91	5.2.3.2, Sustainable Yield with Future Projects	--	See comment on WLPMA sustainable yield without future projects regarding how to define sustainable yield.	Please see response to comment on sustainable yield without future projects above.
CT-1	Chad Taylor	Technical	--	97	6.2.2	--	See previous statements about consistency and the effects of data gaps on sustainable management.	Noted. Text has been revised, where appropriate, to clarify the discussion of data collection and filling of data gaps.
CT-1	Chad Taylor	Technical	--	97	6.2.2.1, last paragraph on page	*Importantly, since adoption of the GSP, several groundwater level monitoring wells have been removed from the monitoring network, including two key wells (Figure 6-3):* *▪02N20W04F02S, which was destroyed; and* *▪02N21W16J03S, which has not been measured since 2019.*	Is the monitoring network still adequate with the removal of these wells?	Text has been added to state that the monitoring network is still adequate, but could be improved by replacement monitoring wells.
CT-1	Chad Taylor	Editorial	--	106	8		Recommend including discussion of the TAC and PAC here as they are outreach, engagement, and coordination components	The PAC and TAC are discussed in the last full paragraph of section 8.1