

LAS POSAS BASIN POLICY ADVISORY COMMITTEE MEETING

NOTICE OF MEETING

NOTICE IS HEREBY GIVEN that the Las Posas Basin Policy Advisory Committee (PAC) will hold a **HYBRID** meeting at **9:00 A.M.** on **Wednesday, January 22, 2025.**

In Person:

Calleguas Municipal Water District, 2100 Olsen Road, Thousand Oaks, CA 91360

via ZOOM:

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

Webinar ID: 848 1632 7542 | Passcode: 400774

AGENDA - REVISED

A. Call to Order

B. Roll Call

C. Agenda Review

D. Public Comments

E. PAC Member Comments

F. Regular Agenda

1. Approve the minutes of the January 9, 2025 Regular Meeting

2. Status Report on Appointment of TAC member to ASR Study Group

The PAC will hear an update from Vice-Chair Grether on his outreach efforts to candidate TAC members regarding their availability and interest in serving on the ASR Study Group.

3. Five-Year GSP Update Watermaster Response Report (re-agendized from Jan 9, 2025)

At its December 13, 2024 meeting, the FCGMA Board approved the Las Posas Valley Groundwater Sustainability Plan (GSP) five-year update. The PAC provided comments in the form of a Recommendation Report and Watermaster replied to those comments in a Response Report. Both reports are attached here for reference. The PAC will discuss Watermaster's Response Report.

4. Basin Optimization Yield Study Revised Schedule

On December 23, 2024, Watermaster submitted the attached memo detailing the need to extend the schedule for the Basin Optimization Yield Study (BOYS). The PAC will discuss the schedule.

5. Discussion of PAC Comments on Draft Initial Las Posas Valley Basin Optimization Plan (Dec 2024)

On December 12, 2024, Watermaster submitted to the PAC for committee consultation the Draft Initial Las Posas Valley Basin Optimization Plan (BOP). The amended Watermaster

Rules give the PAC 63 days from submittal to provide a Recommendation Report.

At its January 9, 2025 meeting, the PAC discussed initial reactions to the draft BOP. Since then, PAC members have submitted comments to the PAC Administrator, attached here in aggregate form (“Master List”). Also attached is a draft Recommendation Report that provides overarching policy recommendations.

The PAC will review: 1) the Master List of comments, and 2) the draft PAC Recommendation Report. PAC comments on the draft Recommendation Report will be incorporated for consideration of final approval at the February 6, 2025 meeting.

6. Draft GSP Annual Report

The Judgment requires that Watermaster submit the GSP Annual Report to the PAC for committee consultation. The 2024 Annual Report is due to the California Department of Water Resources by April 1, 2024. The draft report is attached for PAC review.

Note that two items are missing from the attached draft Annual Report: the audit report and extraction data. The audit is anticipated to be approved at the January 22, 2025 FCGMA/Watermaster Board meeting and completed by March 3. FCGMA/Watermaster staff continue to review extraction data and follow up with reporters on missing or incomplete extraction reports. These two items will be submitted to the PAC as they are completed and submitted to Watermaster.

G. PAC Subcommittee Reports

PAC representatives on subcommittees will provide reports

1. Operations Subcommittee
2. Executive Subcommittee
3. Fiscal Subcommittee
4. TAC Subcommittee

H. Written Communication

None.

I. Future Agenda Items

The PAC will consider items for future agendas.

J. Adjourn

Attachments:

1. F-1 PAC 2024-01-09 Meeting Minutes
2. F-3a Watermaster Response Report (2024-12-03) – PAC Draft 5 Year GSP Evaluation
3. F-3b PAC Recommendation Report (2024-11-08) - Draft Las Posas Valley Basin 5-Year Groundwater Sustainability Plan (GSP) Evaluation
4. F-4 Exhibit A Revised BOYS Schedule
5. F-5a PAC Comments on Draft Initial LPV BOP – Master List
6. F-5b DRAFT PAC Recommendation Report on Draft Initial LPV BOP
7. F-5c Calleguas BOP Comment Letter 2025-01-15
8. F-5d PAC Comments on Draft Initial LPV BOP – RCavaletto supplemental comments
9. F-6a LPV GSP Annual Report PAC Memo
10. F-6b DRAFT 2025 LPVB GSP Annual Report

LAS POSAS VALLEY BASIN POLICY ADVISORY COMMITTEE

Meeting Minutes for January 9, 2025

The Las Posas Valley Basin Policy Advisory Committee (PAC) held a remote-only meeting at 2:00 PM on Thursday, January 9, 2025, via Zoom.

A. Call to Order: Chair Ian Prichard called the meeting to order at 2:02 PM.

B. Roll Call:

The following PAC members were present:

1. Calleguas Municipal Water District – Ian Prichard, Chair
2. West Las Posas Large Agriculture – Rob Grether, Vice-chair
3. Ventura County Waterworks District Nos. 1 and 19 – David Fleisch
4. Commercial – Arturo Aseo
5. Zone Mutual Water Company – John Menne (arrived at item F. 3)
6. East Las Posas Large Agriculture – David Schwabauer
7. East Las Posas Small Agriculture – Josh Waters
8. East Las Posas Mutual Water Company – Laurel Servin
9. West Las Posas Small Agriculture – Richard Cavaletto
10. West Las Posas Mutual Water Company – Steven Murata

The following PAC member was absent:

1. Watermaster (non-voting) – Farai Kaseke

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

D. Public Comments: There were no public comments.

E. PAC Member Comments:

Laurel Servin asked for a year-to-date accounting of what has been spent from the Watermaster budget for the PAC to review, and clarification for whether the Watermaster budget and basin assessments are billed based on the FCGMA fiscal year, the water year, or the calendar year?

Laurel Servin also asked if the current basin assessment amount is fixed for the entire year or subject to change in future quarters? Chair Prichard will forward these questions to Watermaster for clarification.

David Fleisch announced his pending retirement in February, and his successor for the VC Waterworks PAC seat is the newly appointed assistant director for Ventura County Waterworks, Jeff Palmer. David will provide the required documentation for the appointment of Jeff Palmer to Watermaster for approval.

F. Regular Agenda

1. **Approve the Minutes of the December 19, 2024, virtual-only PAC meeting:** Vice-chair Grether moved to approve the minutes as stated for the December 19, 2024, meeting; Richard Cavaletto seconded the motion. The motion passed with a vote of 9 Ayes; 0-Nays; 0-Abstentions.

2. Appointment of TAC member to ASR Study Group

The PAC discussed the appointment of a landowner's representative to the Calleguas Aquifer Storage and Recovery (ASR) Study Group as part of the project planning and as required by the Judgment; Section 8.4.1 requires equal representation in the study group from Calleguas, FCGMA, and LPV landowners, and specifies that the cost of the study will be paid 80% by Calleguas, 20% by FCGMA, and 0% by landowners.

Each study group representative must be either a licensed engineer with relevant Groundwater experience or a certified hydrologist or similarly qualified. The landowners will bear the cost of their representative's time for study group meeting participation and review; a proposal will be made to Watermaster to authorize the fees to be funded by the basin assessments.

Vice-chair Grether suggested Bob Abrams, a senior hydrogeologist with extensive modeling experience, for the position. Bob is a current TAC member therefore he is already well-versed in LPV matters. The PAC discussed this suggestion and, by general consensus, authorized Vice-Chair Grether to contact Bob Abrams to see if he is interested in pursuing this role. Further, the PAC members agreed that if Bob Abrams is not available, the next candidate for consideration shall be Chad Taylor, a certified hydrogeologist and the TAC Administrator.

3. Draft Basin Optimization Plan

The PAC is currently reviewing a draft copy of the Basin Optimization Plan (BOP) as they develop their recommendation report for delivery to Watermaster by the February 13, 2025, deadline.

PAC Administrator, Tony Morgan, distributed the draft BOP document and an interactive Excel worksheet to all PAC members to allow them to review the draft report and individually reply to him with their remarks no later than January 13, 2025. Tony gave a demonstration on how to use the interactive worksheet during the meeting.

The PAC members had a general discussion about the BOP, the need to focus primarily on policy-related issues versus technical issues, and to carefully consider the costs and benefits of each project to ensure efficient spending of basin assessment funds. A subset of the 10 projects listed in the BOP will move forward for inclusion in the Basin Optimization Yield Study for extensive modeling and feasibility studies; the PAC's input will help to inform those decisions.

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

4. Five-Year GSP Update Watermaster Response Report

The Las Posas Valley Groundwater Sustainability Plan (GSP) five-year update was approved by the FCGMA board on December 13, 2024. Prior to the board's approval, the PAC provided input in the form of a Recommendation Report on November 8, 2024, and Watermaster replied to those comments on December 3, 2024. The PAC began a discussion to review Watermaster's responses to its report to determine the status of each recommendation.

After a brief period of discussion, the meeting was interrupted due to newly reported fire evacuation mandates which affected one or more members of the PAC. **All remaining agenda items will be carried forward to the next meeting scheduled for January 22, 2025.**

G. PAC Subcommittee Reports:

1. Operations Subcommittee:
2. Executive Subcommittee:
3. Fiscal Subcommittee:
4. TAC Subcommittee:

H. Written Communication: None.

I. Future Agenda Items: None.

J. Adjournment: Chair Prichard adjourned the meeting at 3:40 PM until the next regular PAC meeting which is scheduled for January 22, 2025, at 9:00 AM.

LAS POSAS VALLEY WATERMASTER RESPONSE REPORT

Date: December 03, 2024

To: Las Posas Valley Watermaster Board of Directors

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

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

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

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

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

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

Response to Recommendation 1:

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

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

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

Response to Recommendation 2:

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

Recommendation 3: Address Deficiency in Monitoring Data Collection

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

Response to Recommendation 3:

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

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

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

Response to Recommendation 4:

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

Recommendation 5: Recharacterize Groundwater Underflows Between Oxnard Subbasin and WLPMA

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

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

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

Response to Recommendation 5:

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

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

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

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

Response to Recommendation 6:

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

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

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

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

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

Response to Recommendation 7:

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

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

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

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

Response to Recommendation 8:

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

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

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

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

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

Response to Recommendation 9:

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

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

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

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

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

Response to Recommendation 10:

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

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

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

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

Response to Recommendation 10:

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

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

TO: Las Posas Valley Watermaster

FROM: Las Posas Valley Watermaster Policy Advisory Committee

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

DATE: November 8, 2024

Recommendation:

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

Policy Rationale for Recommendation:

See memo below for rationale.

Summary of Facts in Support of Recommendation:

See memo below for complete memo.

Tally of Committee Member Votes:

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

Report of Bases for Majority and Minority Committee Member Positions:

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

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

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

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

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

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

I. MODELING AND DATA ACCURACY

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

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

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

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

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

Recommendation 3: Address Deficiency in Monitoring Data Collection

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

II. CROSS-BASIN AND AREA INTERACTIONS

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

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

Recommendation 5: Recharacterize Groundwater Underflows Between Oxnard Subbasin and WLPMA

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

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

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

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

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

III. MANAGEMENT AND PROJECT OVERSIGHT

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

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

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

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

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

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

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

IV. STAKEHOLDER RESPONSIBILITIES AND TRANSPARENCY

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

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

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

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

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

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

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

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

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

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

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

CONCLUSION

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

FOX CANYON GROUNDWATER MANAGEMENT AGENCY

LAS POSAS VALLEY WATERMASTER



MEMORANDUM

To: Las Posas Valley Policy Advisory Committee

From: Kudzai F. Kaseke, Assistant Groundwater Manager

Date: December 23, 2024

RE: Basin Optimization Yield Study Schedule

Dear Las Posas Valley Policy 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 Policy Advisory Committee (PAC), including specifically PAC's policy 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:

Las Posas Valley Policy Advisory Committee
December 23, 2024

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 PAC, including specifically PAC's policy 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 PAC's Recommendation Report, including its policy 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	

1 - Additional scope added based on TAC Recommendation Report including additional modeling scenario and two additional TAC consultations.

2 - Task 3 is now part of Task 2 since UWCD declined to conduct WLPMA modeling under contract to Watermaster.

3 - Date submittal of model files required by UWCD to complete BOY Study in following schedule. This is a critical-path item and delay will delay the entire BOY Study schedule.

Specific Comments from the Las Posas Valley Basin Policy Advisory Committee (PAC)
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Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment
CN-1 (commentor initials and comment number)	Commentor Name	General Technical, General Editorial, Technical, Editorial, etc.	Simple description of comment topic	Page number as it appears in document	Section number with as much detail as possible, including paragraph and line whenever practice	<i>Text from document in italics for identification</i>	Comment with as much detail as possible/necessary.
CMWD-1	Ian Prichard, Calleguas	Policy	Overarching				The biggest problems the basin faces are the two pumping depressions, one in the northern ELPMA and one in the eastern WLPMA. Watermaster and its stakeholders should be laser-focused on solving these two problems. However, the current draft of the Basin Optimization Plan is not a solution-oriented document that is recognizable as a "plan." It is instead a list of projects, some of which, even if built or implemented, would not address the pumping depressions. None of these projects is cheap; building ones that don't solve the problem isn't just expensive, but wasteful and counterproductive. The BOP should describe and rank the problems we are trying to solve, match projects to the problems they solve, and promote those that solve the biggest problems.
CMWD-2	Ian Prichard, Calleguas	Editorial	define WWDs	4	2.1.4	<i>"Additionally, this category is used identify whether the collaboration, cooperation, or participation of the FCGMA, Calleguas Municipal Water District (CMWD), WWDs , United Water..."</i>	Define "WWDs". I assume it's Waterworks District, but it's not used elsewhere
CMWD-3	Ian Prichard, Calleguas	Policy	planning assumptions	4	2.2.1	<i>"Arundo donax (Arundo) would be replaced with native riparian plant species, which are estimated to consume approximately 6 to 25 AFY per acre less water than Arundo (VCWSD 2015)."</i>	This is a massive range. Is there anything more specific for which native plants would replace the arundo, provided it can be removed and kept in abeyance? What's the mix of native plants and the resulting ET savings from that mix that gets us to 8.27 AF/acre savings? I see the reference below to the Wildscape feasibility study—from 2015. Is there anything new in the last decade that *demonstrates* water savings? Something based on an implemented and longstanding removal project rather than a feasibility study?
CMWD-4	Ian Prichard, Calleguas	Policy	planning assumptions	5	2.2.1.1	<i>"Implementation of this project could increase recharge to the ELPMA by as much as 2,680 AFY (VCWSD 2015). This is based on the estimated reduction in evapotranspiration demands associated with the project, or portion of which would occur upstream of the LPVB (VCWSD 2015). Additional modeling is required to characterize the volume of water that would recharge the ELPMA."</i>	If 2,680 is estimated high end of ET savings in Arroyo Simi, how do we know that much will be available for recharge? It would be more accurate to say "as much as 2,680 AFY may be available in Arroyo Simi for downstream recharge." Per the last sentence in this paragraph, more modeling is necessary to have a sense of how much may actually end up in the aquifer.
CMWD-5	Ian Prichard, Calleguas	Policy	planning assumptions	5	2.2.1.2	<i>"This project relies on existing technology and similar projects have been implemented across the Ventura Watershed by various local interests (e.g., Ventura County Public Works Agency, various developers, Rancho Simi Recreation and Parks District, and others)."</i>	Recommend using results from similar projects that have been implemented across the Ventura Watershed to inform math on water savings/increased contributions to the creek, rather than a 2015 feasibility study.
CMWD-6	Ian Prichard, Calleguas	Policy	planning assumptions	5	2.2.1.2	<i>"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."</i>	Knowing how much of the water saved from this Arundo removal project could end up in the LPV basin under various scenarios is the go/no-go question for this project. The sentence as written underplays the importance of that analysis.
CMWD-7	Ian Prichard, Calleguas	Policy	cost assumptions	6	2.2.1.3	<i>"Assuming a 25-year project lifespan and that the project will increase recharge to the ELPMA by 2,680 AFY, the total cost to implement this project is estimated to be approximately \$390 per AF."</i>	Recommend holding off on cost estimates until the modeling is done. Also, costs are based on a 2015 feasibility study and a wide range (6-25 AFY/acre) of savings. If we can find demonstrated savings in a comparable area, we will have higher confidence in the assumptions underlying the cost estimate.
CMWD-8	Ian Prichard, Calleguas	Editorial	planning assumptions	7	2.2.2.1	<i>Water Supply</i>	The amount of imported water necessary to prevent minimum threshold exceedances in the WLPMA should be provided so the potential yield of this project is clear and definitive.
CMWD-9	Ian Prichard, Calleguas	Policy	planning assumptions	7	2.2.2.1	<i>"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."</i>	Where did this number come from?

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CMWD-10	Ian Prichard, Calleguas	Editorial	planning assumptions	7	2.2.2.1	"CMWD represented in recent consultation that the limiting factor is the volume of imported water the two purveyors can accept to offset their pumping in the WLPMA."	There are other limiting factors to the supply: drought and an imported water outage. Calleguas's and Metropolitan's Water Shortage Contingency Plans (in their Urban Water Management Plans) describe the six water shortage stages and their potential impacts on water users. As recently as 2022, when the State Water Project allocation was only 5% for the second year in a row, Metropolitan enacted an Emergency Water Conservation Program that required significant demand curtailment. During such periods, in-lieu water may not be available. Other emergencies that interrupt imported water service would also constrain the availability of in-lieu water.
CMWD-11	Ian Prichard, Calleguas	Editorial/Policy	planning assumptions	7	2.2.2.2	"This project would reinstate a Metropolitan Water District of Southern California incentivized program implemented by CMWD that was operational in the WLPMA between 1995 and 2008."	This references a program that no longer exists and cannot be reinstated.
CMWD-12	Ian Prichard, Calleguas	Editorial	Complexity analysis/comparison	7	All Projects	"Project Complexity"	Recommend some standardization of complexity discussion. Three projects don't offer a judgment on complexity; four are described as "moderately complex"; one is considered "low"; and two are described as "not technically complex."
CMWD-13	Ian Prichard, Calleguas	Policy	planning assumptions	7	2.2.2.2	"During development of the GSP, CMWD indicated that this project lifespan could exceed 50 years."	The "could" in this sentence begs additional exposition. Recommend modifying this text to reflect that the reliability of getting imported water from CMWD is currently equal to the reliability of the State Water Project and Metropolitan Water District. Based on existing infrastructure, it is likely that "imported" water will continue to mean SWP water from MWD, and it is likely that it will be available for more than 50 years.
CMWD-14	Ian Prichard, Calleguas	Policy	project complexity	7	2.2.2.2	"the full benefits of this project may require implementation of other projects, like the Moorpark Desalter (Project No. 4)"	Relying on a groundwater extraction project (Moorpark desalter) to ensure optimum benefit significantly increases the institutional and implementation complexity of this project.
CMWD-15	Ian Prichard, Calleguas	Editorial		7	2.2.2.3	"This cost includes O&M to maintain CMWD's conveyance infrastructure."	Whis is only this portion of the rate called out?
CMWD-16	Ian Prichard, Calleguas	Editorial	costs	7	2.2.2.3	"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."	Clarify that the incentive would come from WM via funds raised as part of basin assessment. It will not be provided by CMWD.
CMWD-17	Ian Prichard, Calleguas	Policy	cost assumptions	7	2.2.2.3		The paucity of dollar signs in this paragraph is striking, especially compared with 2.2.1.3, a project that is more conceptual and conditional. Finding out how much it costs VCWWD-19 and Zone to pump is straightforward—and critical to determining whether/how much to buy.
CMWD-18	Ian Prichard, Calleguas	Policy	cost assumptions	7	2.2.2.3	"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."	It needs to be clear that Calleguas's water would be purchased at the full Tier 1 rate and any financial incentive would be provided by the Watermaster using funds from the basin assessment.
CMWD-19	Ian Prichard, Calleguas	Policy	cost assumptions	9	2.2.3.3	"VCWWD-1 estimates that the capital cost to construct this project is approximately \$4,000,000. O&M costs have not been estimated."	2.2.3.2 states that the GMA recommends modeling to estimate amount of recharge that would stay in the ELPMA. What is the cost estimate for this modeling and can we include it here?
CMWD-20	Ian Prichard, Calleguas	Editorial/Policy	project benefits	10	2.2.4	"...reduce the dependence on imported water in the LPVB by providing new local potable supplies."	There needs to be some way to recognize that different constituents may have different goals. There is a tension between this project, or at least this goal for this project, and projects that bring additional imported water supplies into the basin.
CMWD-21	Ian Prichard, Calleguas	Policy	cost assumptions	10	2.2.4	"Additionally, this project may require construction of additional pipeline to connect the desalter's brine disposal system to CMWD's Salinity Management Pipeline, which discharges brine from various desalters and water treatment plants to the Pacific Ocean."	The project would definitely require construction of additional pipeline to connect the desalter's brine disposal system to the Salinity Management Pipeline (SMP), which currently terminates near Los Angeles Ave. and La Cumbre Rd. An SMP Discharge Station would also be required, which would contain metering and water quality sampling equipment.
CMWD-22	Ian Prichard, Calleguas	Editorial/Policy	project benefits	10	2.2.4.1	"...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."	Please explain how 6,270 AFY of pumping to make room for 2,220 AFY of recharge increases the sustainable yield.
CMWD-23	Ian Prichard, Calleguas	Editorial	project status	10	2.2.4.2	"VCWWD-1 has not completed a feasibility study for this project."	2.2.4.1 references "preliminary numerical groundwater flow modeling." 2.2.4 intro states "Preliminary analyses for the proposed desalter have been completed and the project is in the planning phase."

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CMWD-24	Ian Prichard, Calleguas	Policy	planning assumptions	10	2.2.4.2	"This project is not dependent on other unbuilt projects or projects that are currently under construction."	As stated above, the SMP does not extend to the Moorpark Desalter location and several miles of additional pipeline would need to be constructed to serve the Moorpark Desalter. The last sentence of this paragraph states "VCWWD-1 may need to develop an agreement with CMWD to dispose of brine produced at the desalter via CMWD's Salinity Management Pipeline." There are other options besides the SMP for disposing of brine (though how they compare to the SMP is unclear), but if VCWWD-1 wants to use the SMP to dispose of its brine, it would definitely require an agreement with Calleguas to do so.
CMWD-25	Ian Prichard, Calleguas	Policy	project benefits	11	2.2.4.4	"reduce the dependence on imported water in the LPVBLPV by providing new local potable supplies "	see comment IP-13 re: 2.2.4
CMWD-26	Ian Prichard, Calleguas	Editorial		11	2.2.4.4	"Depending on the operational conditions and distribution of desalted water, this project ."	sentence incomplete
CMWD-27	Ian Prichard, Calleguas	Policy	project benefits	12	2.2.5	"...leaving 2,200 to 3,700 AFY available as surface flow and recharge to the ELPMA."	is "surface flow" the same as "recharge"?
CMWD-28	Ian Prichard, Calleguas	Policy	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."	The water is flowing today. How does developing an agreement with Simi to ensure it continues to flow "increase" sustainable yield—at all, let alone by 2,000 AFY?
CMWD-29	Ian Prichard, Calleguas	Policy	project benefits	12	2.2.5.2	"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"	The water is not "additional" unless and until it has a place to go that it doesn't now.
CMWD-30	Ian Prichard, Calleguas	Policy	cost assumptions	13	2.2.5.3	"...FCGMA anticipates that this water will cost less than the \$500/AF evaluation criterion..."	What is the basis for this assumption? What cost are we assuming for the budgeting? Recycled water goes for much higher than this in other parts of the state—in fact, just a few miles down the 101. Offers have been made to the City of Simi Valley to tie up this water, and yet it has not been tied up. Calleguas currently has an agreement with the City to buy recycled water for more than \$1,100/AF.
CMWD-31	Ian Prichard, Calleguas	Policy	project benefits	13	2.2.5.4	"... this project would maintain native habitat..."	What is the definition of "native habitat"? The second sentence of this paragraph states that "perennial flow... did not begin until the 1970s." Also, without Arundo removal, the water will also maintain invasive species.
CMWD-32	Ian Prichard, Calleguas	Editorial		14	2.2.6.2	"FCGMA anticipates that implementation of Phase I could be completed within a 2-year timeframe following commitment of funds for the feasibility study."	Whose commitment?
CMWD-33	Ian Prichard, Calleguas	Editorial/Policy	cost assumptions	15	2.2.6.2	"may be required to construct, operate, and maintain desalter facilities "	Who would pay for these?
CMWD-34	Ian Prichard, Calleguas	Editorial/Policy	planning assumptions	15	2.2.6.3	"Additionally, this does not include any costs required to construct, operate, and maintain local desalters to treat the recycled water to levels suitable for irrigation..."	Whose responsibility is it to maintain what level of service?
CMWD-35	Ian Prichard, Calleguas	Editorial/Policy	planning assumptions	15	2.2.6.3	"... and to avoid significant and unreasonable degradation of water quality."	Whose responsibility is this? And of what "water"? This seems like a different goal than irrigation water quality depending on what water we're talking about.
CMWD-36	Ian Prichard, Calleguas	Policy	planning assumptions	15	2.2.7	feasibility study	It is unclear why a feasibility study is needed. In lieu deliveries have been made to Ventura County Waterworks District No. 1 in the past and the infrastructure remains in place.
CMWD-37	Ian Prichard, Calleguas	Policy	planning assumptions	16	2.2.7.1	Water Supply	Consideration could also be given to directly injecting imported water into Calleguas's Las Posas Aquifer Storage and Recovery Wellfield.
CMWD-38	Ian Prichard, Calleguas	Policy	planning assumptions	16	2.2.7.1	Water Supply	The amount of imported water necessary to prevent minimum threshold exceedances in the ELPMA should be provided so the potential yield of this project is clear and definitive.
CMWD-39	Ian Prichard, Calleguas	Editorial		17	2.2.7.4	Benefits...	there doesn't appear to be text in this section
CMWD-40	Ian Prichard, Calleguas	Policy	project benefits	17	2.2.7.5	"... the potential increase to the sustainable yield of the ELPMA."	How would it increase sustainable yield? It would offset pumping or shift pumping or add to total water use in the basin, but it doesn't increase "yield."
CMWD-41	Ian Prichard, Calleguas	Editorial		18	2.2.8.4	Benefits...	there doesn't appear to be text in this section
CMWD-42	Ian Prichard, Calleguas	Editorial	CEQA	19	2.2.9.2	"CEQA and NEPA are not required to implement this project."	CEQA does apply, even if only to file an NOE
CMWD-43	Ian Prichard, Calleguas	Editorial	grants	20	2.2.9.3	"however, Watermaster staff continuously monitor for potential grant funding"	This should be a blanket statement made at the top of the document or in every Cost and Funding subsection
CMWD-44	Ian Prichard, Calleguas	Policy	collaboration	20	2.2.9.4	Collaboration Requirements	Calleguas already operates a monitoring network comprised of nested, clustered, and individual monitoring wells, as well as monitors wells owned by others. Any monitoring efforts should be closely coordinated with Calleguas to prevent unnecessary duplication.
CMWD-45	Ian Prichard, Calleguas	Policy	collaboration	20	2.2.10	groundwater monitoring	Like Project 9, this needs to be done in strong coordination with CMWD.

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Draft Initial Las Posas Valley Basin Optimization Plan

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment
CMWD-46	Ian Prichard, Calleguas	Editorial	planning assumptions	22	2.3.1	<i>"Three projects are sufficiently defined to implement without additional feasibility studies to define project scopes, costs, and benefits."</i>	See notes to Project No. 2, which would require additional analysis to identify current demands, which will impact costs and benefits. Likely won't rise to the level of a feasibility study, but will require some refinement.
RG-01	Rob Grether	Editorial	Watermaster or FCGMA	1	1.1	<i>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.</i>	5.3.1 states "Watermaster shall...develop and maintain a Basin Optimization Plan." While FCGMA is currently serving as Watermaster, this sentence and others like it should be changed to match the Judgment.
RG-02	Rob Grether	Editorial	Text from 5.3.2.1	1	1.1	<i>Criteria for determining the priority and feasibility of each Basin Optimization Project;"</i>	5.3.2.1 specified the criteria that are to be used for determining the priority and feasibility of each project. As written, it suggests the FCGMA will be setting the criteria instead. The criteria specified in the Judgment should be repeated here so a reader doesn't have reference the Judgment to know if projects in the BOP conform: "Criteria for determining the priority and feasibility of each Basin Optimization Project...shall include, but not be limited to, the estimated amount of yield augmentation, cost effectiveness, cost feasibility, technical/engineering feasibility, project implementation timing, benefits relative to the achievement of Sustainable Groundwater Management, and whether the collaboration, cooperation, or participation of the FCGMA, Calleguas, WWDs, United Water Conservation District, or the Water Right Holders is necessary or desirable for implementation of the Basin Optimization Project.
RG-03	Rob Grether	Editorial	Specific text from 5.3.2.2	1	1.1	<i>A description of Basin Optimization Projects;</i>	should be modified to include full text from 5.3.2.2: "A description of 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."
RG-04	Rob Grether	Editorial	Specific text from 5.3.2.5	1	1.1	<i>A schedule for the Basin Optimization Projects which are to be evaluated, scoped, designed, financed, or developed; and</i>	Include full text emphasizing need to coordinate timelines with other agencies: "5.3.2.5. A schedule for the Basin Optimization Projects which are to be implemented to be evaluated, scoped, designed, financed, and developed. If the collaboration, cooperation, or participation of the FCGMA, Calleguas, WWDs, United Water Conservation District, or the Water Right Holders is necessary or desirable for any evaluation, scoping, design, financing, and development of any Basin Optimization Project, the schedule shall so consider the time necessary for such collaboration or cooperation; and
RG-05	Rob Grether	General Editorial	Criteria from 5.3.2.1	6 and others	2.2	<i>Benefits relative to Sustainable Groundwater Management</i>	This criterion is specified in 5.3.2.1 but missing from projects 1 - 6, 9, 10
RG-06	Rob Grether	Technical	Arundo removal math	4	2.2.1 and 2.2.1.1 and 2.2.1.4	<i>The Arroyo Simi-Las Posas Arundo Removal Project involves removal of the invasive plant species Arundo donax from approximately 324 acres of land along the Arroyo Simi-Las Posas corridor. Arundo donax (Arundo) would be replaced with native riparian plant species, which are estimated to consume approximately 6 to 25 AFY per acre less water than Arundo (VCWSD 2015). 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).</i>	The math doesn't track. If arundo removal can result in between 6 and 25 AFY per acre less water, that would mean a range of 1,404 to 5,850 AFY, yet in 2.2.2.1 it says project could result in "as much as 2,680 AFY." If additional assumptions are being made that further reduce the potential water savings, they should be identified and the math should be clearly described. And then in 2.2.1.4 it says Arundo uses 1,900 AFY more than native riparian species. Would the plan be to plant native riparian species in place of the Arundo? If so, what is the cost. If not, why mention this?
RG-07	Rob Grether	Technical	Arundo removal math	4	2.2.1	<i>FCGMA estimates the total cost to implement this project is approximately \$390 per AF</i>	The estimated cost only holds if the yield is 2,680 AF. It should be clearer that it could be much higher per AF if actual infiltration does not hit the target.
RG-08	Rob Grether	General Technical	Permitted cost and time delays	4, 9	2.2.1 & 2.2.3.2		Some projects (e.g., Arundo removal, stormwater diversion, fish ladder construction) can trigger lengthy permit reviews by multiple agencies. The Plan should underscore how that could affect both scheduling and total cost.
RG-09	Rob Grether		Number formatting	6	2.2.1.3	<i>\$9,100,00 and an O&M cost of \$250 per acre-foot (AF) of water.</i>	I think there is a missing 0
RG-10	Rob Grether	General Editorial	CMWD cost clarity	6	2.2.2	<i>During development of the GSP ... 1,762 AFY of CMWD water would be available ... 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.</i>	The estimated cost of pumping should disclosed so that stakeholders are clear what the net cost per AF would likely be if this project were pursued. Stakeholders may not have an appetite for water at this cost and would opt instead to face rampdown to lower allocations.
RG-11	Rob Grether	Editorial	CMWD importation limitations	7	2.2.2.1	<i>CMWD represented in recent consultation that the limiting factor is the volume of imported water the two purveyors can accept to offset their pumping in the WLPMA. FCGMA used these projections for analysis of the project for this Plan.</i>	More information on the limitations should be provided. Can the limitation be mitigated through investment in infrastructure? What would the cost be?

**Specific Comments from the Las Posas Valley Basin Policy Advisory Committee (PAC)
Draft Initial Las Posas Valley Basin Optimization Plan**

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment
RG-12	Rob Grether	Misc	Storm water recharge	8	2.2.3	<i>Arroyo Las Posas storm water capture and recharge</i>	Similar to this project, I propose establishing a voluntary program to incentivize landowners in both the East and West Las Posas Management Areas (ELPMA and WLPMA) to capture stormwater runoff on their properties, particularly from local barrancas and canyons. Under this program, participating landowners would construct or expand small retention ponds or infiltration basins and receive financial compensation for each acre-foot of stormwater successfully recharged to the basin. This distributed approach can supplement larger-scale recharge initiatives, reduce peak flows downstream, and help sustain groundwater elevations above SGMA thresholds. In addition to augmenting groundwater supplies, the program could yield co-benefits such as reduced soil erosion, enhanced flood protection on private lands, and improved habitat for local wildlife. To ensure transparency and effectiveness, a straightforward protocol would be developed for measuring and verifying infiltration volumes (e.g., through metering or water-level data). Funding could come from Basin Assessment fees, grants, or local agency contributions, enabling partial or full reimbursement of capital costs to install or upgrade ponds. This model fosters local stakeholder engagement and shares the responsibility for achieving sustainable groundwater management—making it a cost-effective, community-based solution that builds resilience across the entire Las Posas Valley Basin.
RG-13	Rob Grether	General Editorial		8	2.2.3	<i>could provide up to 2,000 AFY of diversions ... No groundwater modeling has been conducted to characterize the storage capacity ... or the volume of recharged water that would remain in the ELPMA.</i>	O&M is not yet estimated, but could be substantial (e.g. for sediment removal, fish ladder maintenance, pumping, etc.)
RG-14	Rob Grether	Technical		10	2.2.4	<i>6,270 AFY for the desalter project would result in an additional 2,200 AFY of recharge</i>	6,270 AFY pumping to net 2,200 AFY yield gain is a low ratio implying a big fraction of the pumped water may be brine or lost to discharge? That may be the case, but consider clarifying the mechanics and math.
RG-15	Rob Grether	Editorial		11	2.2.4.4	<i>Depending on the operational conditions and distribution of desalted water, this project.</i>	Sentence is truncated and missing the point.
RG-16	Rob Grether	General Technical	Limited Alternative Markets and Pricing Considerations	11	2.2.5	<i>The City has indicated that 3,000 AFY of recycled water from the SWVQCP would be available and 1,700 AFY would be available from the dewatering wells (FCGMA 2019). However, due to the riparian use of the water along the Arroyo Simi-Las Posas...</i>	While Simi Valley might theoretically sell its dewatering well flows, the 3,000 AFY of recycled water faces significant regulatory constraints and lacks other practical buyers. The City is already required—and pressured by environmental stakeholders such as The Nature Conservancy—to continue discharging a baseline flow into Arroyo Simi-Las Posas. This raises doubts about whether a true “market rate” exists for this water and whether paying for it in a purchase agreement might inflate its perceived value. The Watermaster and stakeholders should thus carefully evaluate the actual economic worth of this water before finalizing any deal.
RG-17	Rob Grether	General Editorial	SWVQCP	11 & 13	2.2.5 & 2.2.6		Multiple projects rely on the same water source (e.g., SWVQCP discharge). If one project (e.g., pipeline deliveries) partially or wholly uses that water, the volumetric benefit for the other project (e.g., discharge acquisition in the arroyo) might drop. The Plan references this but could highlight the trade-off more prominently.
RG-18	Rob Grether	Technical	Simi pipeline cost clarity	15	2.2.6.3	<i>In 2017, the City indicated that approximately 3,000 AFY of recycled water would be available ... Implementation in two phases ... capital cost (Phase II) of \$22.1 million ... ~ \$700/AF over 25 years ... does not include cost to purchase or lease the water from the City or potential desalting costs.</i>	The \$700/AF omits water purchase cost and potential on-farm or point of delivery desalting. This might push the cost well above other projects, perhaps even imported water through CMWD. The Plan should be very clear what the all-in cost could be with clear articulation of the discrete assumptions.
RG-19	Rob Grether	Editorial		17	2.2.7.4	<i>Benefits relative to Sustainable Groundwater Management</i>	Section is blank and needs to be completed - this is one of the criteria specified in 5.3.2.1
RG-20	Rob Grether	Editorial		18	2.2.8.4	<i>Benefits relative to Sustainable Groundwater Management</i>	Section is blank and needs to be completed - this is one of the criteria specified in 5.3.2.1
RG-21	Rob Grether	General Technical	Data are critical	18	2.2.9	<i>Cost is approximately \$50,000 for Phase I ... \$550,000 per well</i>	This project improves data quality, which has intangible but critical benefits for SGMA compliance. It should be more clearly emphasized that the cost, while high, is a fraction of the cost of mismanagement if data are lacking.
RG-22	Rob Grether	Editorial	Inclusion in the BOY	22 & 23	2.3	<i>Recommendation for inclusion in the BOY</i>	It should be clear if a project is not “Recommended for Inclusion in the BOY” if it is “not recommended for immediate implementation” vs. “not recommended at all”

**Specific Comments from the Las Posas Valley Basin Policy Advisory Committee (PAC)
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RG-23	Rob Grether	General Editorial	Integration of Milestones with SGMA Compliance and Cost-Benefit Tracking		4		<p>In addition to the high-level quarterly budget estimates presented in Appendix D, it is important to recognize that many of these projects will run concurrently and interactively. Each has key milestones—for example, feasibility study completion dates, major construction phases, or regulatory approvals—that will determine whether a project continues as planned or requires adjustment. Simultaneously, the Judgment and SGMA impose their own milestones, such as interim sustainability targets and potential rampdowns of total pumping allocations.</p> <p>Accordingly, a phased investment approach—one aligned with these two sets of milestones—will allow the Watermaster and stakeholders to make more informed decisions. As data from feasibility studies or initial implementation efforts become available, it may confirm (or challenge) previous assumptions about costs, yield, and overall viability. If one project’s actual benefits fall short of projections, there may be a need to reallocate resources to other projects with higher potential return. Conversely, if a project meets its early benchmarks and proves cost-effective, then accelerating its funding could help offset additional rampdowns in groundwater pumping or meet interim SGMA targets.</p> <p>By synchronizing project milestones with SGMA checkpoints—and embedding cost-benefit reassessments into each critical decision point—the Watermaster can better ensure that expenditures are directed to projects that deliver the best value for achieving sustainable groundwater conditions, rather than locking in a rigid spending plan detached from new information and evolving basin conditions.</p>
RG-24	Rob Grether	Editorial	Least Cost Acquisition Program	17	2.2.8	<i>title: Developing a Least Cost Acquisition Program</i>	Project title matches the language from the Judgment, but it would be clearer if the title were: Allocation Buyback and Reduction Program.
RG-25	Rob Grether	General Editorial	Least Cost Acquisition Program		2.2.8.1	<i>Water Supply This project is a paper study to develop a Least Cost Acquisition Program. The study will not provide a new water supply or directly increase the yield of the LPV.</i>	Proposed expanded language: "Although this initiative does not create new water supply, it reduces pumping in water-deficit areas and may, in turn, improve groundwater levels. The net effect would be to promote storage recovery and stability within the basin. Where land is fallowed or production shifts away from high-water-demand crops, local pumping can be reduced—leading to higher overall water levels."
RG-26	Rob Grether	General Editorial	Least Cost Acquisition Program		2.2.8.2	<i>Timing and Feasibility section</i>	<p>This section currently only includes a description of how FCGMA would spend time and money to evaluate how this kind of program would work. It would be valuable to also include some information on how a program would likely work to paint a clearer picture for Watermaster and stakeholders at this time. I propose adding details such as the following:</p> <p>Policy Development - The Watermaster, in consultation with the PAC and TAC, would set rules and pricing mechanisms that reflect basin needs, market conditions, and stakeholder interests.</p> <p>Transaction Mechanics - Purchases of allocation could occur via periodic reverse auctions or direct negotiation. Over time, the program would need to adapt if market conditions shift (e.g., drought, changing crop values).</p> <p>Implementation Phases 1) Feasibility and Structure: Define goals, purchase methods, funding sources, and monitoring protocols. 2) Pilot Transactions: Conduct limited initial buybacks or leases to gauge market response and refine policy. 3) Full Implementation: Roll out basin-wide or focus on specific water-deficit zones as conditions warrant.</p> <p>Program Oversight - Because economic and policy factors dominate this project’s success, the PAC (in partnership with the Watermaster) should have a long-term oversight role—reviewing program performance, setting priorities for water-deficit areas, and advising on how to address unintended consequences (e.g., abrupt land-use changes).</p>

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Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment
RG-27	Rob Grether	General Editorial	Least Cost Acquisition Program		2.2.8.3	<i>Cost and Funding</i>	In addition to recognizing that the study could cost \$100,000, expected but undefined cost components of a program like this should be included, too. For example: Program Budget - A dedicated fund (e.g., from basin assessments or grants) would be needed for purchasing allocations. Administrative Costs - The program requires ongoing administration to process transactions, verify compliance, and track water use. Unlike a single construction project, costs here are mostly operational and policy-driven over the long term. Potential Grants or Offsets - State or federal sources might help subsidize fallowing or land-use transitions that protect groundwater. Economic Considerations - Land Fallowing and Local Economy - If allocation sales result in idled land, regional employment and material purchases (e.g., fertilizer, seed, equipment) may decline. These impacts should be studied or mitigated through compensation programs or assistance in crop transitions.
RG-28	Rob Grether	General Editorial	Broader Opportunity for Arundo Removal	4	2.2.1	<i>The Arroyo Simi–Las Posas Arundo Removal Project involves removal of the invasive plant species Arundo donax from approximately 324 acres of land along the Arroyo Simi–Las Posas corridor. Arundo donax (Arundo) would be replaced with native riparian plant species, which are estimated to consume approximately 6 to 25 AFY per acre less water than Arundo (VCWSD 2015).</i>	Although this project currently focuses on the Arroyo Simi–Las Posas corridor, Arundo donax also grows in numerous barrancas across private lands throughout the Las Posas Basin. Restricting removal efforts to a single waterway may limit potential water savings. If feasible, the project could be expanded to incentivize private landowners to remove Arundo on their properties and replace it with less water-intensive native riparian species in areas where the reduced evapotranspiration could increase Basin recharge. This broader, basin-wide approach would likely increase total recharge benefits, although it would also necessitate additional coordination, funding, and outreach to ensure successful implementation.
RG-29	Rob Grether	General Editorial	Schedule	24	3		Section 3 would benefit from a discussion of the more critical near-term tasks/next-steps over the next three years or so. This could be organized by quarter for 2025 and thereafter by year for years 2026 and 2027. Such an addition should specifically state the core activities that are anticipated by quarter (or year for 2026 and 2027). This would help Watermaster and the stakeholders visualize how projects fit together (and in some cases are interdependent) and to assess whether Watermaster is on track for planned project implementation. It would also accord with Section 5.3.2.4 of the Judgment, which requires that the BOP include "[a] prioritization schedule of the Basin Optimization Projects to be implemented."
RG-30	Rob Grether			24	2.2.4 and 3		The draft BOP acknowledges that several of the projects (arundo removal, arroyo storm flow capture and recharge, and City of Simi Valley water acquisitions) may be dependent, at least partially, on other projects, notably the proposed Moorpark Desalter. Because the success of several of the proposed projects hinge on this question, the extent to which they are dependent on the desalter should be included in the description of the feasibility study for the desalter in Section 2.2.4 and should be prioritized by Watermaster to undertake and finalize as soon as possible. This analysis would presumptively rely on modeling of those projects that are potentially dependent on the desalter. This, in turn, depends on the adequacy of the Calleguas groundwater flow model for the ELPMA to accurately model these projects and their interdependence on the desalter for their effectiveness. Thus, consistent with the preceding comment, the schedule should acknowledge these modeling questions as critical near-term tasks and should specify when these matters can be reasonably completed.

Specific Comments from the Las Posas Valley Basin Policy Advisory Committee (PAC)
Draft Initial Las Posas Valley Basin Optimization Plan

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment
RG-31	Rob Grether	General Editorial	Budget	24	4		Section 4 should discuss the amount of Basin Assessments that will be necessary to fund the BOP's 5-year budget. This will help Watermaster, stakeholders, and if necessary the Court, understand the financial parameters necessary for responsible and sustainable management of the Basin and maintenance of the Basin's Operating Yield. Further, Section 4 should acknowledge that Appendix D calls for modest expenditures in Q2 of 2025, but that the next budget is not scheduled to be determined until Watermaster's June Board meeting at the end of Q2. Section 4 should recommend a solution for Watermaster to resolve this mismatch in timing such as reliance on unspent Watermaster funds from the current year or a loan from the FCGMA's general fund to be reimbursed once revenue is received from the Basin Assessment.
RG-32	Rob Grether	Misc	Alternate Desalter Siting Considerations	10	2.2.4		As part of the feasibility analysis, consider evaluating the costs and benefits of locating the desalter nearer to the East/West boundary of the Las Posas Basin. Doing so may: - Reduce brine disposal costs and complexities by shortening the connection to the Calleguas Salinity Management Pipeline, and - Expand distribution options through Berylwood Heights Mutual Water Company and Zone Mutual Water Company infrastructure, which serves both the East and West Basin Management Areas.
JDM-1	Menne	Misc	Clarity on costs	N/A	N/A	N/A	Need clarity on all estimated costs, both capital and annual operating costs, expressed on a \$ per AF basis.
JDM-2	Menne	Misc	Identify Point Person for Grants	N/A	N/A	N/A	Need a person with responsibility to pursue grants and other forms of funding projects
JDM-3	Menne	Misc	Pursue Diverse Sources of Water	N/A	N/A	N/A	Use reasonable efforts to obtain diverse sources of water to reduce risk of current single source of water
JDM-4	Menne	Technical	Feasibility of Project 2	7	2.2.2.2	<i>Because this project will rely on existing infrastructure....</i>	Confirm capacity of Zone and VCWWD infrastructure to accept projected flows
JDM-5	Menne	Technical	Feasibility of Project 2	7	2.2.2.3	<i>The cost to implement this project is driven by CMWD's water rates.</i>	Discuss reimbursement to Zone and VCWWD for use of their infrastructure and related costs.
JDM-6	Menne	General Technical	Feasibility of Project 3	8	2.2.3.2	<i>VCWWD-1 is conducting a Feasibility Study....</i>	Confirm the Study will include estimated capital costs and operating costs expressed as \$ per AF
JDM-7	Menne	Technical	Need for adequate monitoring wells	18	2.2.9	<i>This project proposes installation of multi-level monitoring wells....</i>	Prioritize installation of sufficient number of monitoring wells/devices to adequately monitor basins' groundwater status and enhance future management and decision-making.
AAA-01	Art Aseo	General Technical	Addition of location map	N/A	N/A	N/A	Please consider adding a location map to show approximate location of planned projects that are reasonable to plot, understanding that some projects might be impossible to show locations.
AAA-02	Art Aseo	General Technical	Revise first sentence	8	2.2.3.2, Project Phasing and Timing	<i>VCWWD-1 is conducting a feasibility study for this project, which they anticipate completing by March 30, 2025.</i>	Change sentence to: "VCWWD-1 has completed the feasibility study for this project. The design is in progress with an anticipated completion by end of 2025." Please reflect same changes on Appendix B (page 50).
AAA-03	Art Aseo	General Technical	Revise second sentence	8	2.2.3.2, Project Phasing and Timing	<i>VCWWD-1 anticipates that construction of the diversion facilities could be completed in a single phase by June 30, 2027.</i>	Change sentence to: "VCWWD-1 anticipates that construction of the diversion facilities could be completed in a single phase by end of 2027." Please reflect same changes on Appendix B (page 50).
AAA-04	Art Aseo	General Technical	Additional sentences to address future extension of CMWD's SMP from Camarillo/Somis to Moorpark (Phase 2E), and the right-of-way acquisition for the Moorpark Desalter project.	10	2.2.4, second paragraph	<i>Add sentences after: Additionally, this project may require construction of additional pipeline to connect the desalter's brine disposal system to CMWD's Salinity Management Pipeline, which discharges brine from various desalters and water treatment plants to the Pacific Ocean.</i>	Add the following: "Also, CMWD's SMP will need to be extended from Camarillo/Somis to Moorpark to provide brine disposal. There is also a requirement to acquire a right-of-way or easement for the desalter and associated pipelines."
AAA-05	Art Aseo	General Technical	Moorpark Desalter's dependency on other project (CMWD's SMP)	46	Appendix B	<i>Not dependent on other unbuilt projects.</i>	VCWWD-1 believes that the Desalter project will be dependent on future CMWD's SMP (Phase 2E) for the disposal of brine water. Please reflect same comment on Appendix B (page 51, Dependency on Other Projects).
sm1	Steven Murata	general Technical	monitoring wells	19	2.2.9	<i>WLPMA and Oxnard SubBasin</i>	Del Norte Water Co. has several highly monitored wells in this area. I'm sure other existing well could be also set up for monitoring.

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LS-1	Lauret Servin	General Editorial	Arundo removal project	1 - Dudek	Table 1	<i>Arundo donax removal, and periodic maintenance, from Arroyo Simi-Las Posas corridor</i>	The cost to maintain the removal of the arundo is unclear - would like clarification of the annual O&M plan. Also, I have personal experience with the removal of arundo on 6 acres along the barranca on my property. We replaced the arundo with mule fat and other native species, and the aggressive arundo regrowth was unmanageable. We installed special irrigation to support the new/replacement native species and followed all instructions to the letter; still, we could not keep the arundo regrowth away. I am concerned that the initial cost plus the ongoing cost to continually cut away the regrowth will cause exorbitant costs for such a small anticipated yield. Will any weed abatement products be allowable? Second, how will this support groundwater quality as stated in Appendix B?
LS-2	Lauret Servin	General Editorial	Page numbering throughout	All	Table of Contents	<i>Various</i>	The page numbering convention throughout the document needs work. Some pages have no numbers; multiple sections start over at Page 1 - the numbering should be revisited.
LS-3	Lauret Servin	General Editorial	Design and Installation of Dedicated Monitoring Wells	1 - Dudek and Appendix D-2, D-3	Table 1 and Appendix D-2 and D-3	<i>Construction of up to four (4) nested monitoring wells to address spatial data gaps in groundwater elevation monitoring the LPV</i>	Table 1 lists the construction of up to four (4) new monitoring wells: In Appendix D, pages D-2 and D-3, there are six new wells listed in six consecutive quarters. Conflicting information - needs correction.

TO: Las Posas Valley Watermaster

FROM: Las Posas Valley Watermaster Policy Advisory Committee

RE: Recommendation Report – DRAFT INITIAL LAS POSAS VALLEY BASIN OPTIMIZATION PLAN

DATE: January 17, 2025

Dear Las Posas Valley Watermaster,

The Las Posas Valley Watermaster Policy Advisory Committee (PAC) provides this Recommendation Report on the **DRAFT INITIAL LAS POSAS VALLEY BASIN OPTIMIZATION PLAN dated December 2024.**

Recommendation:

See memo below for recommended changes/additions to the *Draft Initial Las Posas Valley Basin Optimization Plan* (December 2024).

Policy Rationale for Recommendation:

See memo below for rationale.

Summary of Facts in Support of Recommendation:

See memo below for complete summary of facts.

Tally of Committee Member Votes:

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

Report of Bases for Majority and Minority Committee Member Positions:

PAC Recommendations Report Regarding the Draft Initial Las Posas Valley Basin Optimization Plan

On December 12, 2024, the Fox Canyon Groundwater Management Agency (FCGMA), serving in its capacity as the Watermaster for the Las Posas Valley Basin (LPVB), sent a Committee Consultation request to the LPVB Policy Advisory Committee (PAC) regarding the *Draft Initial Las Posas Valley Basin Optimization Plan (BOP)* prepared by Dudek, Inc., as the FCGMA's consultant.

The PAC recognizes the significant effort put forth by the FCGMA and their consultant, Dudek to prepare the *Draft Initial BOP* and is appreciative of the opportunity to provide comments on the document for consideration by the FCGMA.

Following a thorough review by the PAC, the member comments were compiled into the Master List appended to this Recommendations Report. Individual comments are keyed to the BOP sections for ease of cross reference and provide more detailed insight into PAC member's suggestions for improving the BOP. PAC comments were distilled into the policy recommendations provided below that were approved by the PAC on , 2025.

Recommendation 1: Provide details on how the BOP would be performed.

The PAC noted that the Draft Initial BOP, while providing information about the projects proposed for evaluation in Basin Optimization Yield Study, contained very limited information about how the plan would be executed—how the analysis of each project would be performed or the results interpreted within the goals of the plan. The current BOP language does not promote a solutions-oriented workflow or clearly show how SGMA and Judgment milestones impact the implementation timeline of the plan. It recommended that the BOP be revised with a detailed discussion on, for example but certainly not limited to, how the projects would be evaluated (e.g., what modeling scenarios would be run, single projects or suites of projects), what the relationship is between the prioritized projects and the feasibility studies (i.e., are both to be included in the Basin Optimization Yield Study or only the prioritized projects), and how the modeling scenarios or feasibility studies address the goal of achieving and maintaining an Operational Yield of 40,000 AFY.

Recommendation 2: Provide details on anticipated project costs and potential funding sources.

Cost information was lacking for many projects, which makes it difficult to evaluate the cost/benefit relationship and to perform comparisons between the various projects. The lack of cost information, even at the placeholder level, skews the cost factor used in the project ranking. We are recommending that the various costs, including operations and maintenance, as well as the agency's anticipated costs, be estimated (even as a range of costs, if necessary) and included in the BOP to help stakeholders understand the potential range of project costs. It is recognized that the anticipated costs included in the BOP would be placeholders and would be updated as the project scope matures and modeling or feasibility results become available. The BOP should include a section on potential funding mechanisms/sources for each project. As currently written,

stakeholders cannot discern what entity(ies) would be fiscally responsible for implementation, as well as the operations and maintenance aspects of these projects.

Recommendation 3: Project benefit interdependencies should be clearly analyzed.

Full realization of some of the project benefits are dependent on the implementation of other projects. These dependencies can increase the complexity and potentially the costs of individual projects (e.g., two projects must be implemented to achieve the full project benefits). The PAC recommends that the project interdependencies be clearly communicated and that the project descriptions include language about the interdependencies and how the interdependencies impact the implementation and operations and maintenance costs.

Attachments:

PAC Member Comments Draft Initial Las Posas Valley Basin Optimization Plan Master List

RAUL AVILA, PRESIDENT
DIVISION 1

THIBAUT ROBERT, SECRETARY
DIVISION 4

REDDY PAKALA, DIRECTOR
DIVISION 3



1/22/2025 PAC Agenda Packet - REVISED
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January 15, 2025

Gene West, Chair
Las Posas Basin Watermaster
800 S. Victoria Ave.
Ventura, CA 93009
(and via e-mail to efwest2012@gmail.com)

Chair West:

As a constituent group to the Las Posas Basin Policy Advisory Committee (PAC) and Technical Advisory Committee (TAC), Calleguas Municipal Water District (Calleguas) has provided detailed comments on the draft Las Posas Valley Basin Optimization Plan (BOP) via both those entities. This comment letter is intended to complement those separate detailed comments and explains our overall concerns about the ability of the BOP, as currently written, to address the requirements of the Judgment and long-term needs of the Las Posas Valley Basin.

As you know, Section 4.9.1.1 of the Judgment states that the initial Operating Yield will be 40,000 AFY through at least Water Year 2024. Section 4.9.1.2 then states, "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." Potential approaches to augmentation are to be evaluated in the BOP, with Section 5.3.2.2 further clarifying that the BOP must include: "A description of 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."

The Basin Optimization Yield is the yield that can be achieved without undesirable results under the Sustainable Groundwater Management Act (SGMA). To achieve a Basin Optimization Yield of 40,000 AFY, projects need to focus on the two areas of the Basin where modeling has shown that undesirable results are likely under baseline conditions, specifically the eastern West Las Posas Management Area and the northern East Las Posas Management Area. As currently written, the BOP evaluates each project for consistency with SGMA and the likelihood of causing material injury or undesirable results; however, it does not evaluate the projects for their ability to alleviate the potential for undesirable results as compared to the baseline conditions and improve basin conditions such that a Basin Optimization Yield of 40,000 AFY becomes achievable.

As a collaborative partner in the Las Posas Basin, we believe it is critical that the projects chosen for implementation both achieve the outcomes necessary to address undesirable results and are cost-effective. Calleguas remains willing and able to facilitate the primary in-lieu and replenishment programs the BOP contemplates by delivering imported water at the full Tier 1 rate at which we supply water to our customers.

We appreciate your consideration of these comments as the Draft Initial Las Posas Valley BOP is revised. Please feel free to contact me at (805) 579-7173 or kmccaffrey@calleguas.com if you have any questions or need any additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "K. McCaffrey", with a long horizontal flourish extending to the right.

Kristine McCaffrey, P.E.
General Manager

Specific Comments from the Las Posas Valley Basin Policy Advisory Committee (PAC)
Draft Initial Las Posas Valley Basin Optimization Plan

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment
CN-1 (commentor initials and comment number)	Commentor Name	General Technical, General Editorial, Technical, Editorial, etc.	Simple description of comment topic	Page number as it appears in document	Section number with as much detail as possible, including paragraph and line whenever practicle	<i>Text from document in italics for identification</i>	Comment with as much detail as possible/necessary.
RC-1	Cavaletto	General Technical	Project Criteria and Project Selection		Section 2		I have serious reservations about the way the 10 projects were ranked, and which were chosen to be included in the Basin Optimization Yield Study. Projects that are in the Feasibility Study and Data Gap Project Prioritization (FSDGPPG) grouping are at a distinct disadvantage to those in the Water Supply Project Prioritization (WSPPG) grouping. Using the same criteria to evaluate two distinctly different types of projects leads to the FSDGPPG projects receiving lower scores regardless of their value when compared to the WSPPG projects, i.e. there is a bias for basin replenishment projects. Placing higher value on the WSPPG projects leads to spending significantly more money early in the 5-year review cycle without the benefit of the knowledge to be gained from the FSDGPPG projects. Additionally, the knowledge from the FSDGPPG projects may lead to not needing to implement some of the WSPPG projects. Specifically, projects number 8, 9, and 10. Project 8 could show that there are enough water users in the basin that would be willing to "sell" their water either short term (5-10 years) or long term (>10 years) for a price equivalent to the value derived from the use of the water. This water would be banked in the basin and the cost to purchase the water could be spread across all users at a cost lower than going after Basin replenishment water or reduce the need for Basin replenishment water. Projects 9 and 10 can assist in verifying the groundwater conditions of the basin and improve the hydrologic models being used to verify the impact of various proposed activities in the basin.
RC-2	Cavaletto	Technical	Point allocation	18	2.2.8.2	<i>FCGMA anticipates that the Program developed through this project would have a lifespan that exceeds 25 years. However, this Program should be re-evaluated at a 5-year frequency to ensure that water costs and priority areas are appropriately reflected in the Program.</i>	Just because there is a 5-year re-evaluation period doesn't mean it has a <5 year life. The points allocated should be "5", not "1".
RC-3	Cavaletto	Editorial	Missing Text	18	2.2.8.4		There is no text listed for this criteria
RC-4	Cavaletto	Technical	Point allocation	16	2.2.7.2	<i>Anticipated Project Lifespan: Not applicable</i>	The point allocation is "1" for this criterion when the text says it "isn't applicable". This is an example of when a criterion isn't applicable, and the project is then penalized with low points because it doesn't fit.
RC-5	Cavaletto	General Editorial	Project Implementation Schedule and 5-Year Project Implementation Budget	24	3 and 4		Why is it assumed that all 10 projects need to be completed in 5 years? While grants can reduce the cost of projects to water users, what is the limit to the amount of project costs that could be passed onto the water users each year? This should inform the schedule.

FOX CANYON GROUNDWATER MANAGEMENT AGENCY

LAS POSAS VALLEY WATERMASTER



MEMORANDUM

Date: January 15, 2025
To: Las Posas Valley Watermaster Policy 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 Policy Advisory Committee (PAC):

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 (Judgment) 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:

FOX CANYON GROUNDWATER MANAGEMENT AGENCY

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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 Agency², (4) five incorporated cities which are all or a portion of each is within the FCGMA jurisdictional area³, 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 website⁴.

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 2023⁵. 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 allocations⁶, 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 2024⁷. 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 wet⁸ 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)

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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.

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

Water Year	CMWD (Acre-Feet)						CWD (Acre-feet)								Total
	WLPMA		ELPMA				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	Sub-total	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.

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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 (VRGWF; 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 an 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 aquifer¹⁰ 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.

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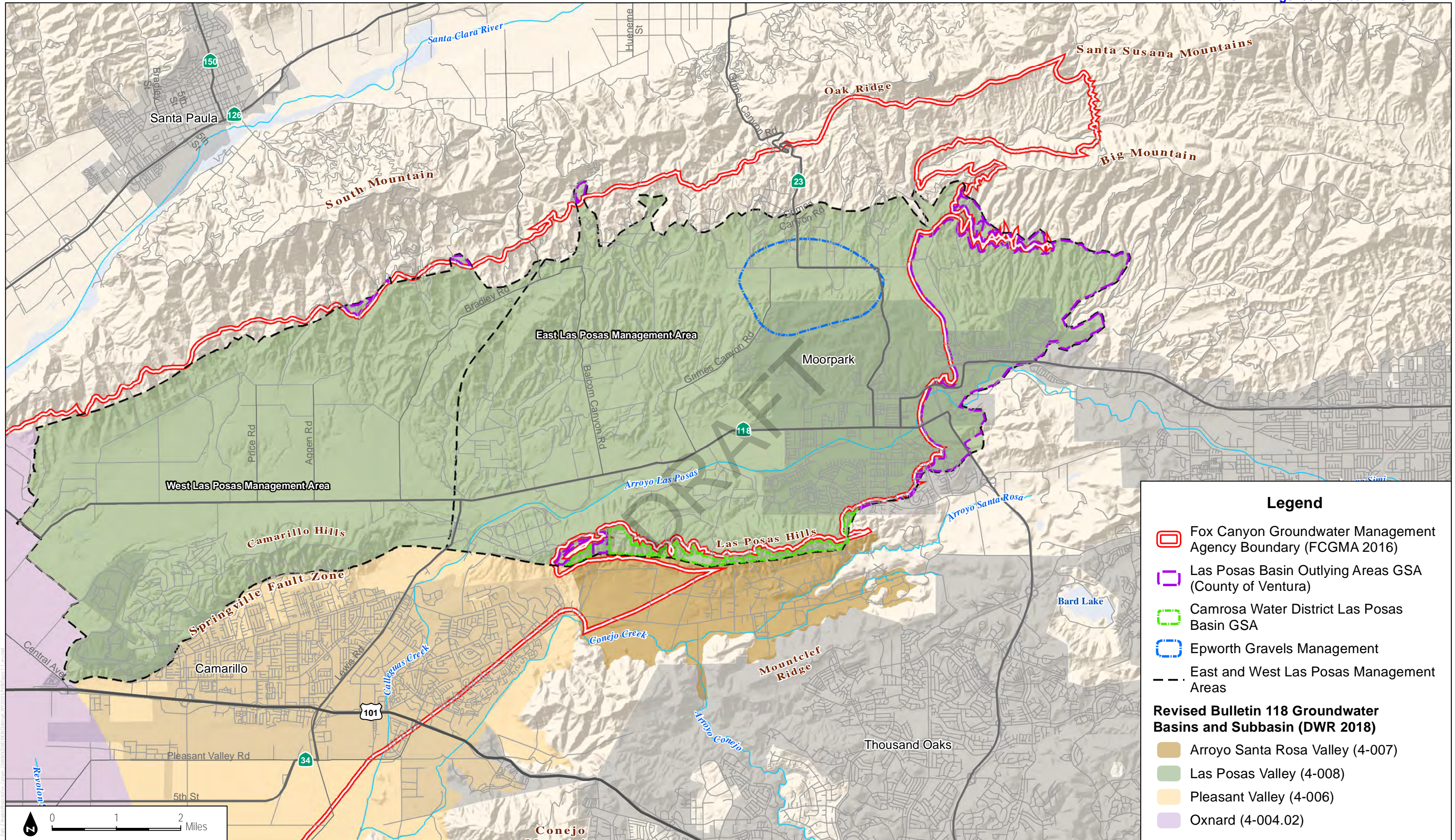
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Legend

- 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)

FIGURE 1-1

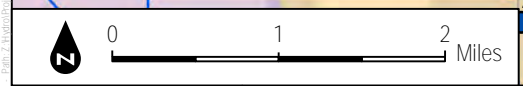
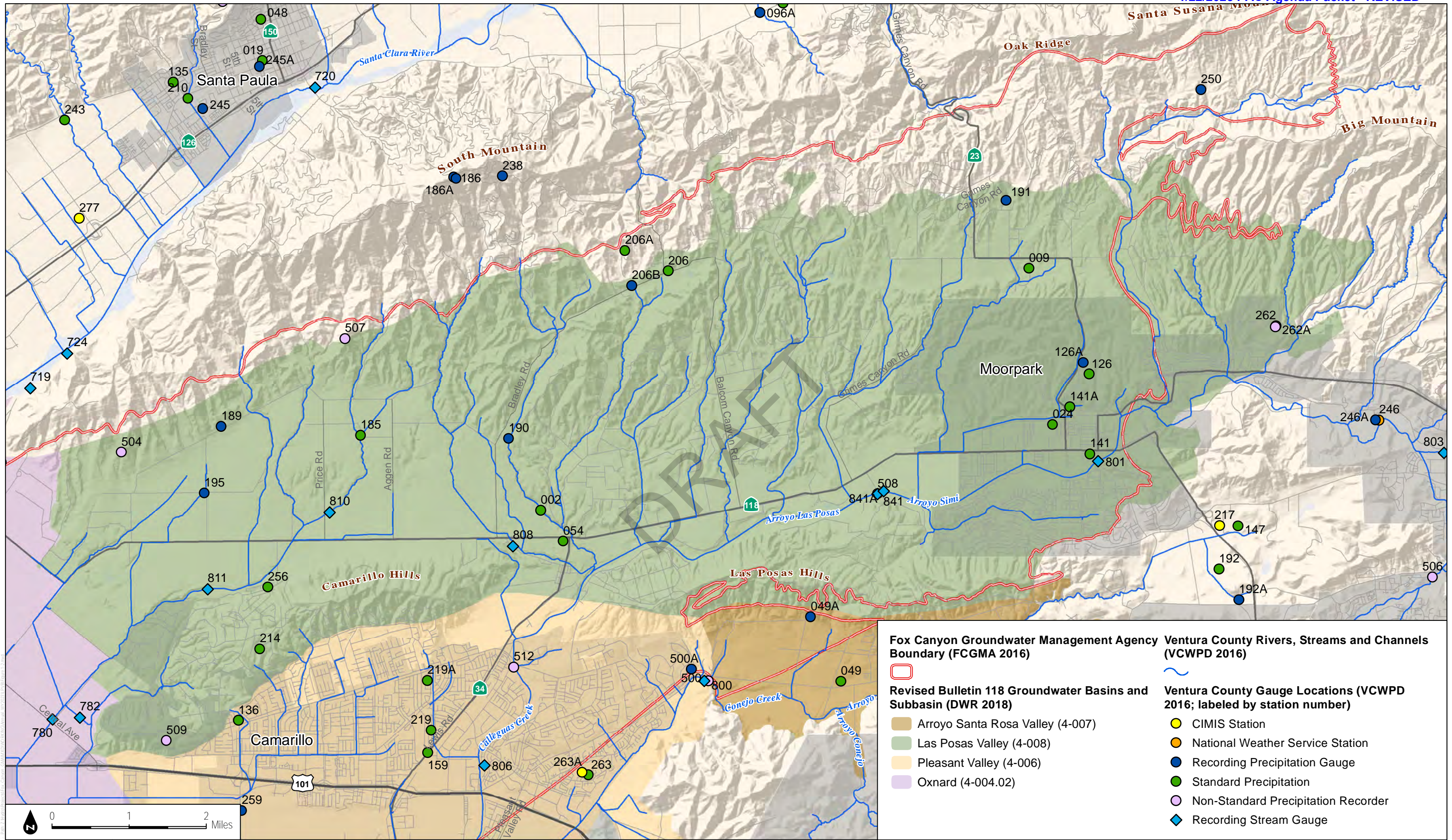
Vicinity Map for the Las Posas Valley Basin



SOURCE: DWR: Ventura County

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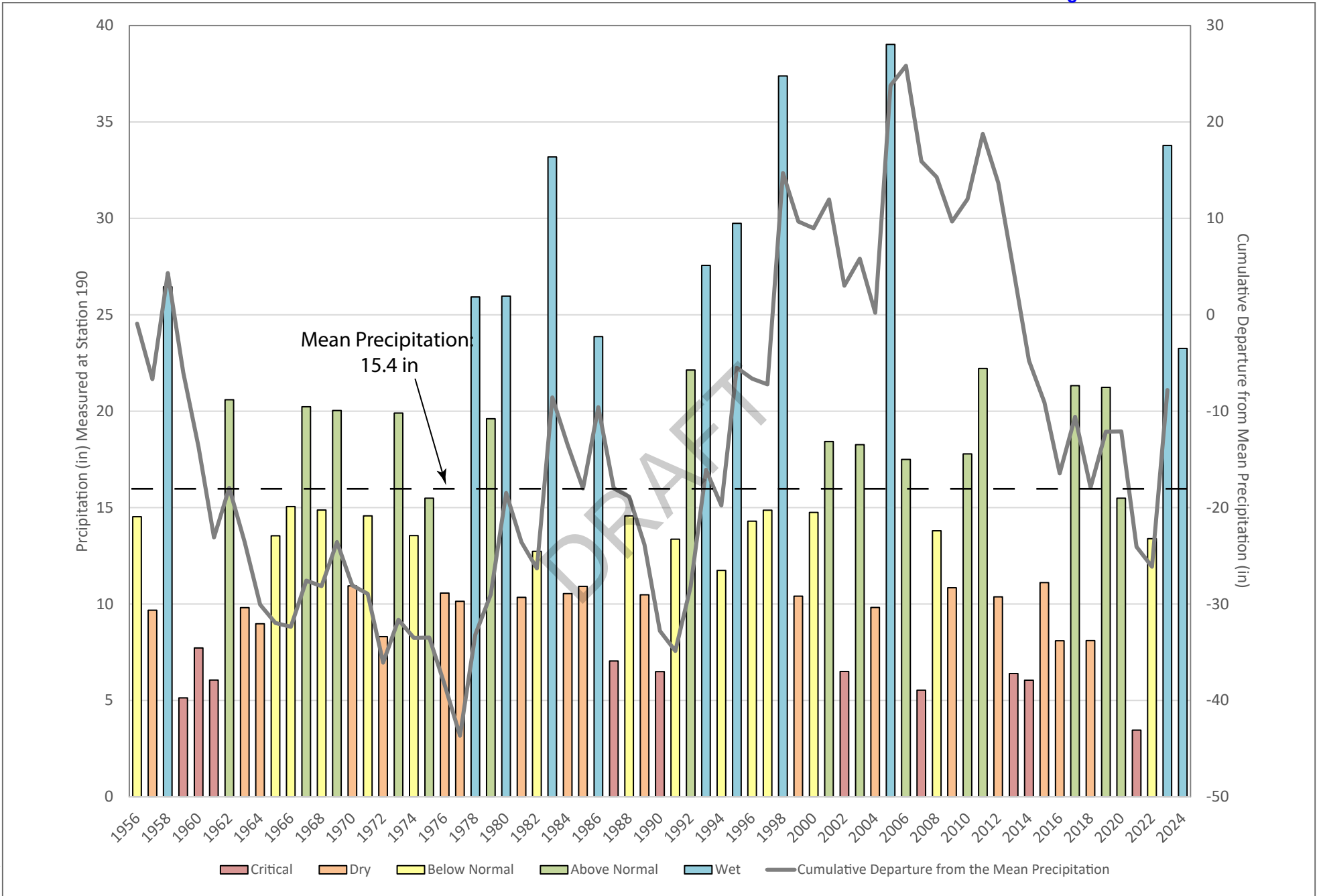
SOURCE: DWR; Ventura County; VCWPD



FIGURE 1-2
Precipitation and Stream Gauges in the Las Posas Valley Basin

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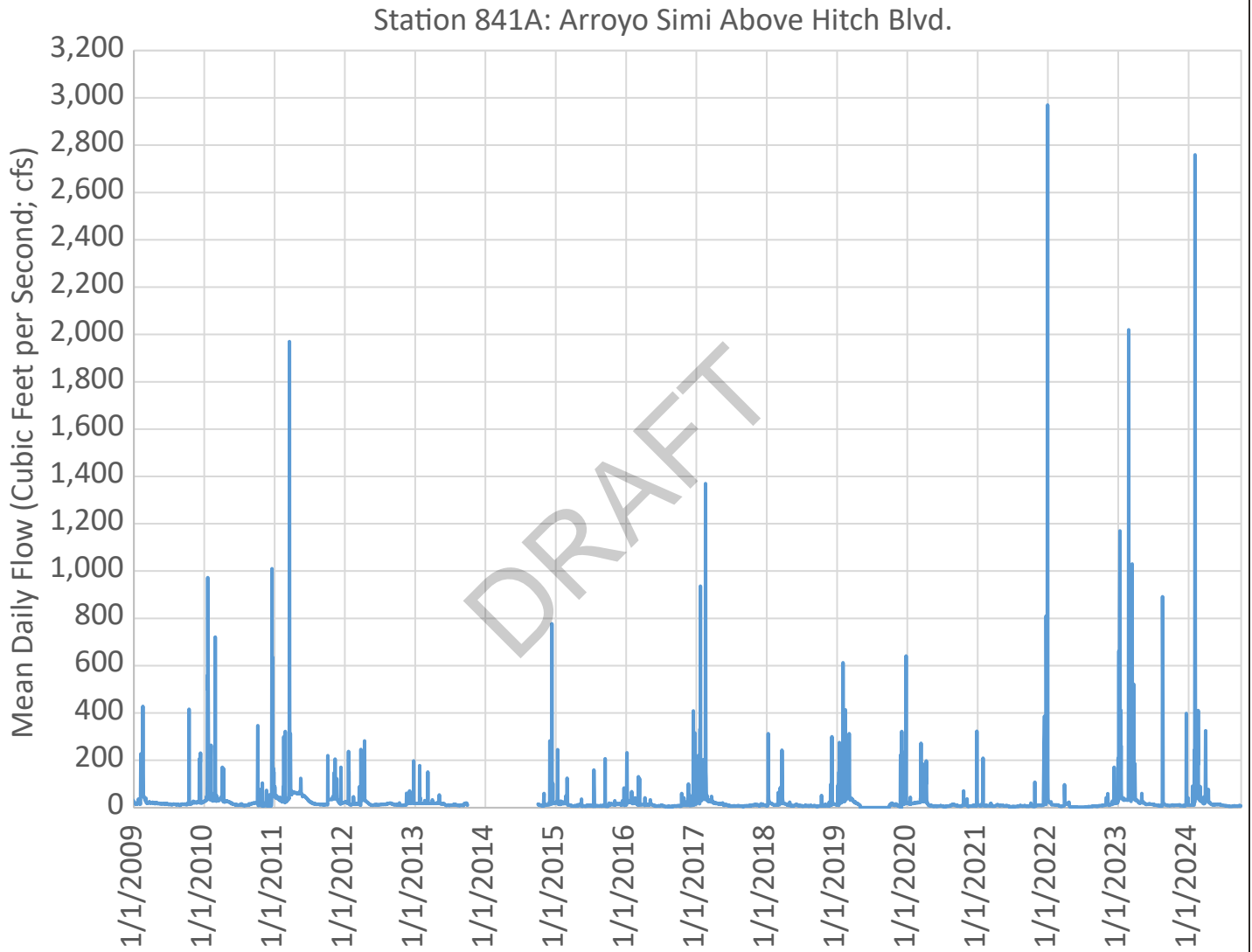


Note: Water year is October 1 through September 30. Water year type is based on the percentage of the water year precipitation compared to the mean precipitation. Types are defined as: Critical (<50% of mean), Dry (>50% to <75% of mean), Below Normal (>75% to <100% of mean), Above Normal (>100% to <150%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

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/>)

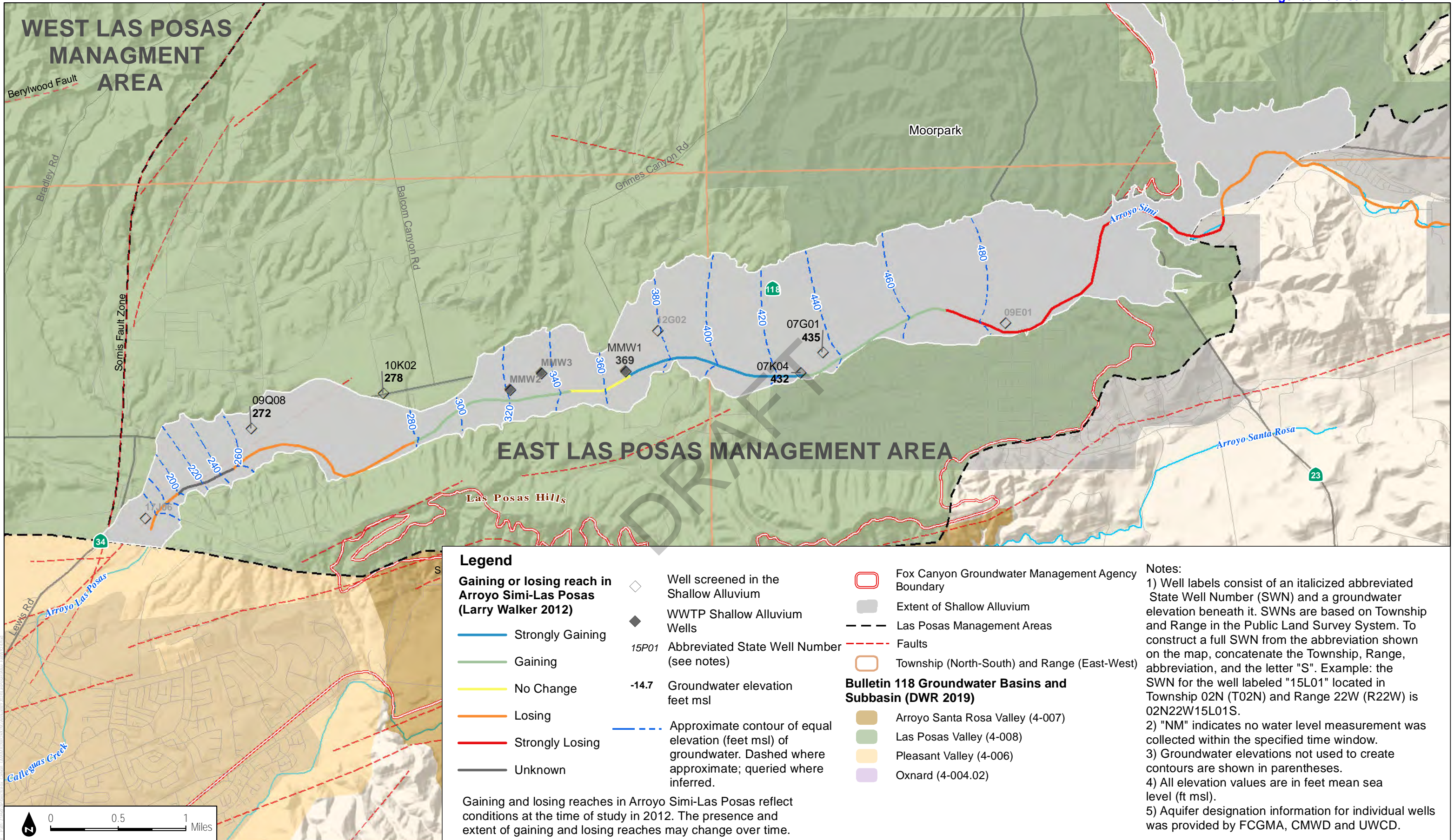
FIGURE 1-4

Las Posas Valley Basin Stream Gauge Data

Las Posas Valley Basin Groundwater Sustainability Plan 2025 Annual Report

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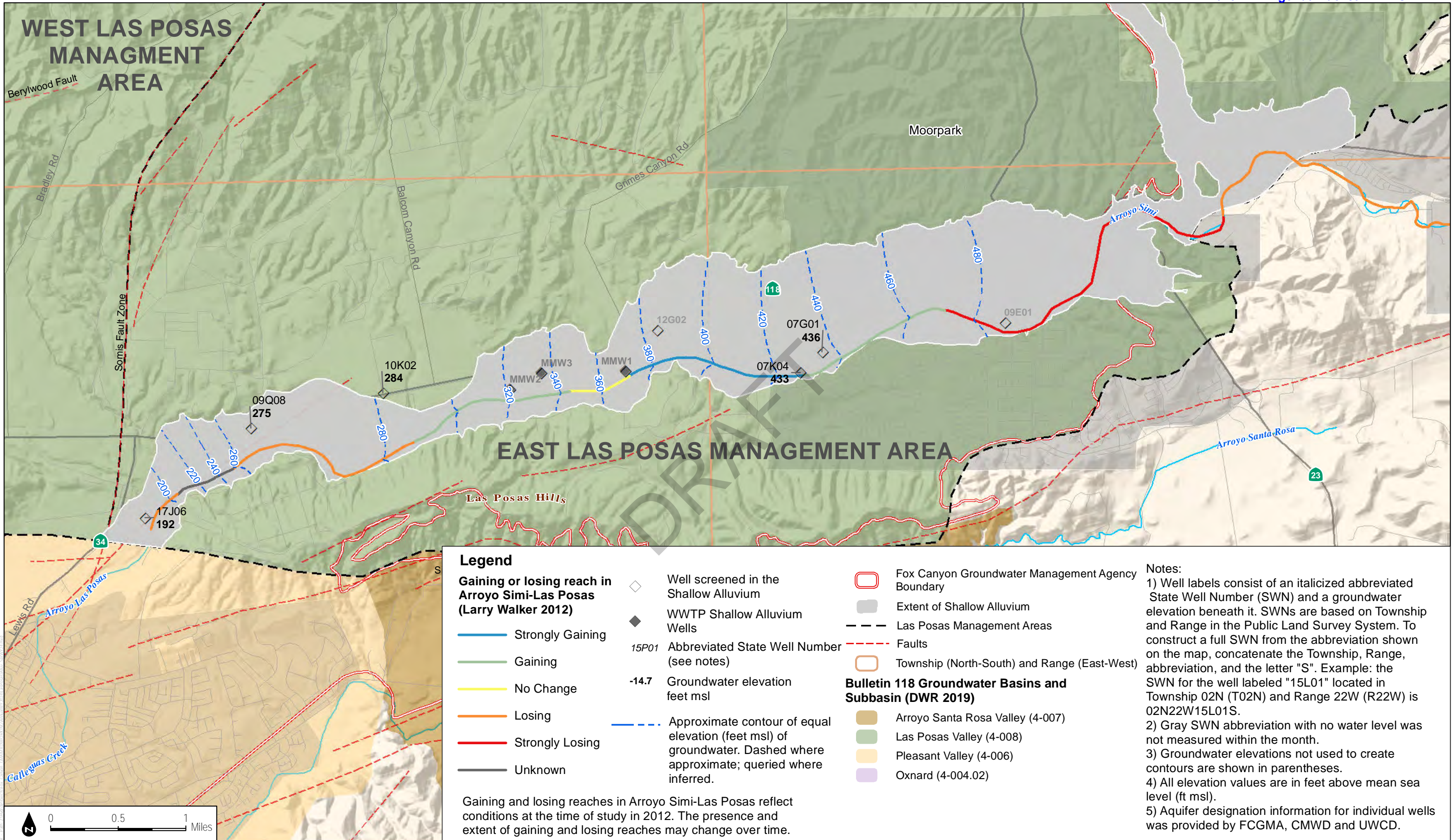
SOURCE: DWR; Ventura County; UWCD; CMWD



FIGURE 2-1
Groundwater Elevation Contours in the Shallow Alluvial Aquifer, October 1 to 31, 2023

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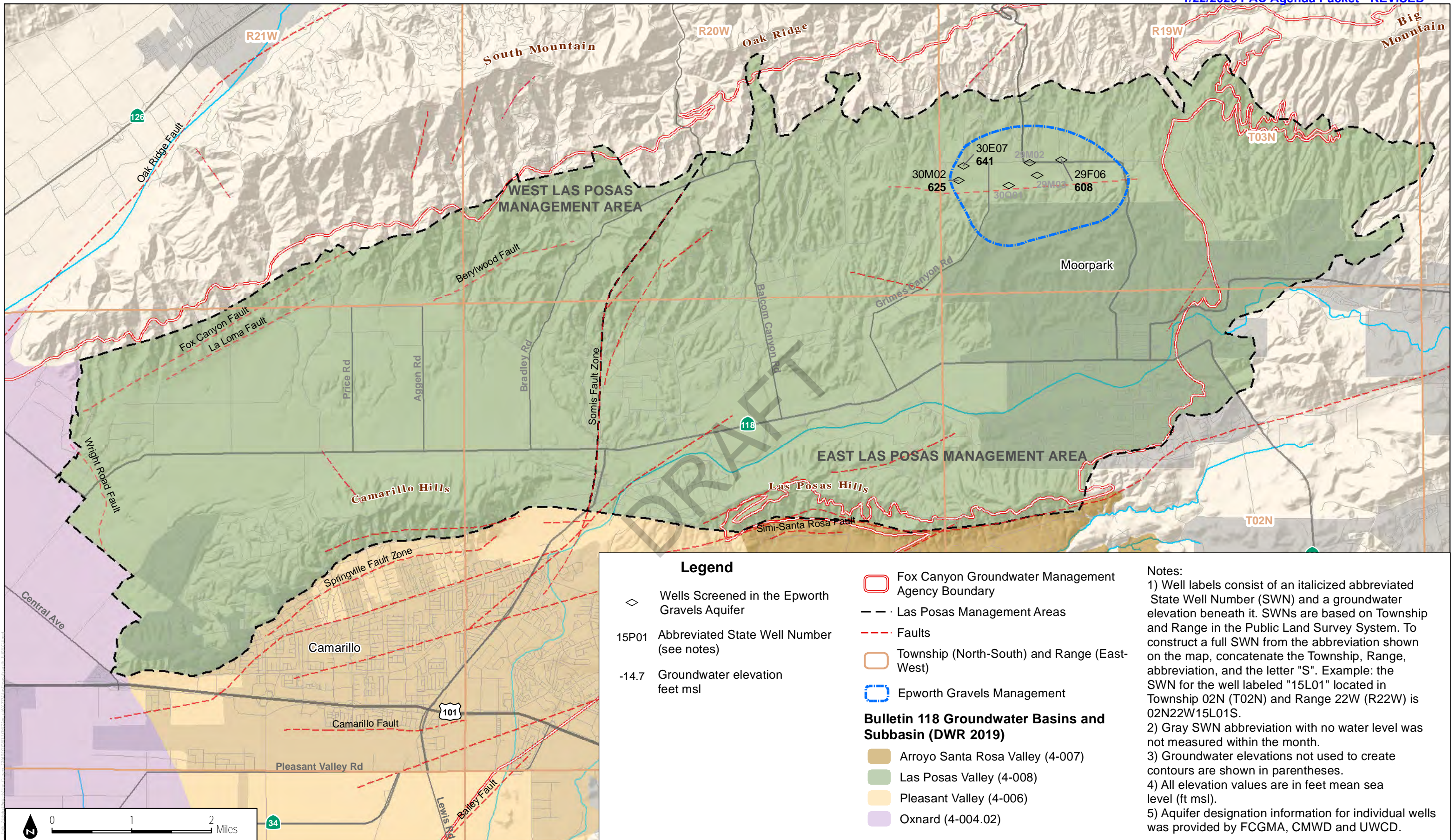
SOURCE: DWR; Ventura County; UWCD; CMWD



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.



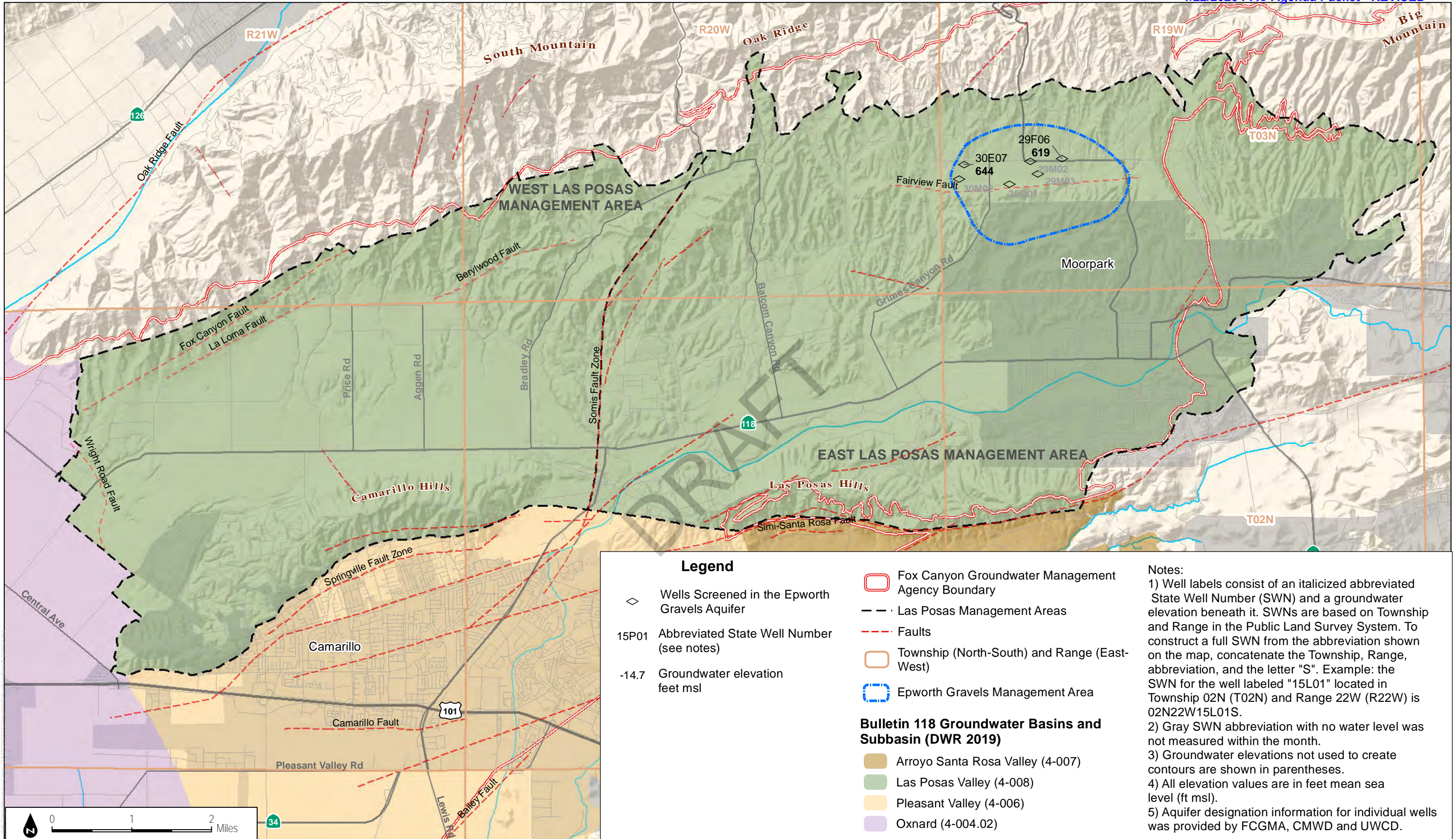
SOURCE: DWR; Ventura County; UWCD; CMWD



FIGURE 2-3
Groundwater Elevation Contours in the Epworth Gravels Aquifer, October 1 to October 31, 2023

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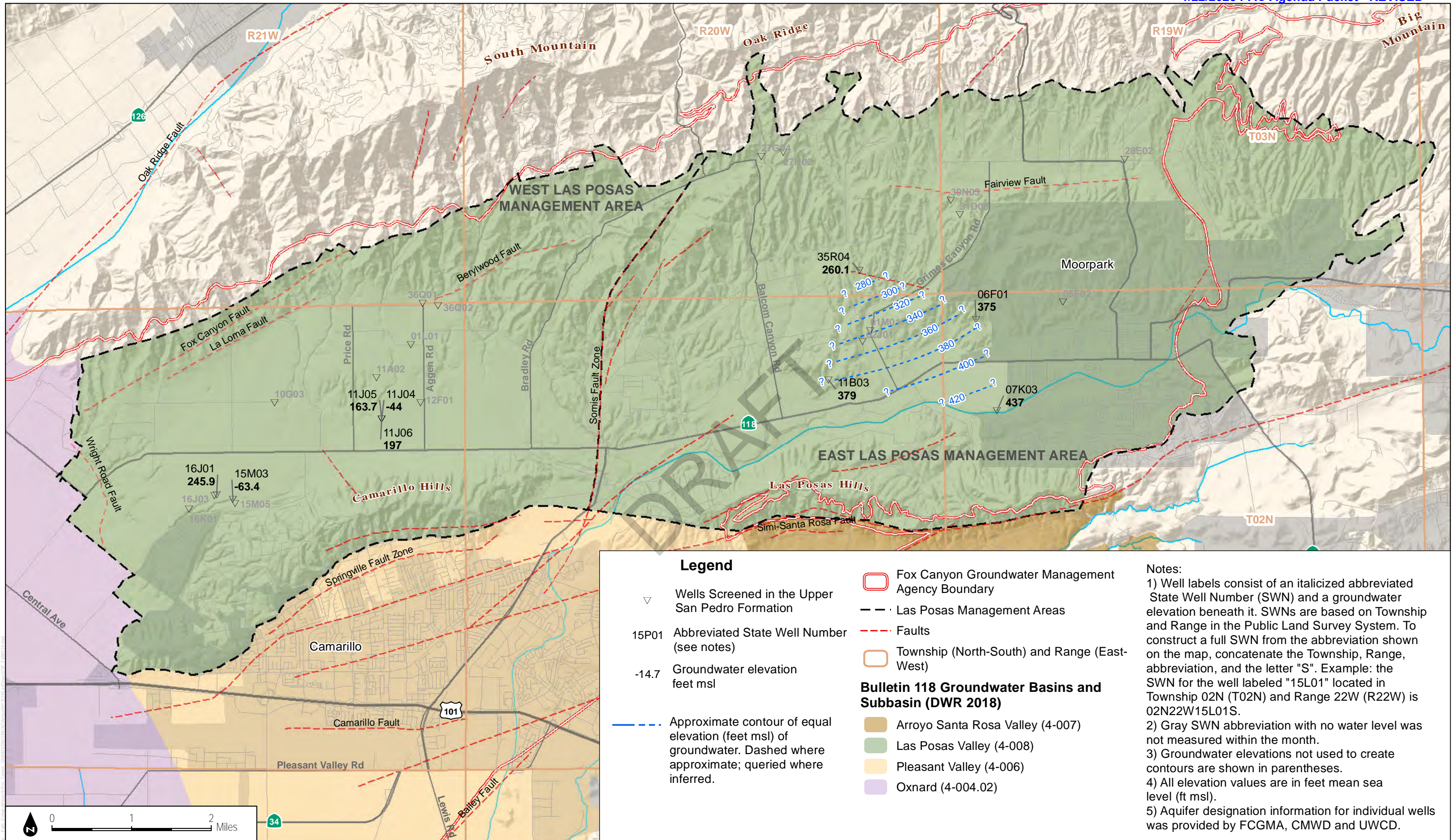
SOURCE: DWR; Ventura County; UWCD; CMWD



FIGURE 2-4
Groundwater Elevation Contours in the Epworth Gravels Aquifer, March 1 to March 31, 2024

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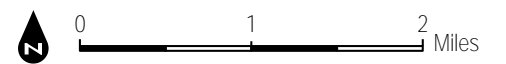


Legend

- ▽ 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)
- 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.



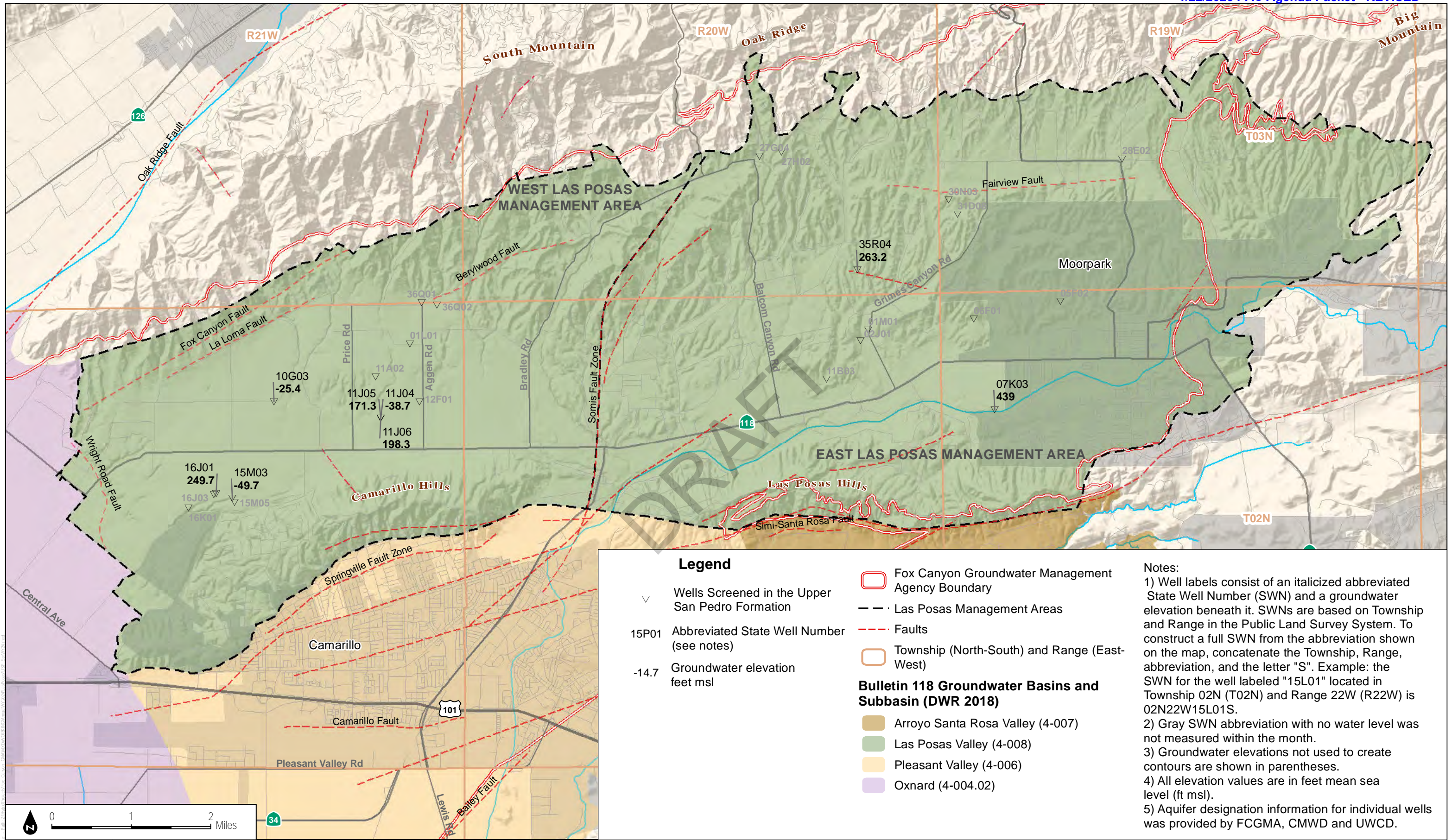
SOURCE: DWR; Ventura County; UWCD; CMWD



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

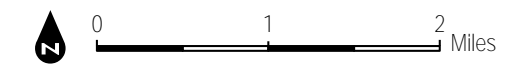
- Fox Canyon Groundwater Management Agency Boundary
- Las Posas Management Areas
- Faults
- Township (North-South) and Range (East-West)

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.



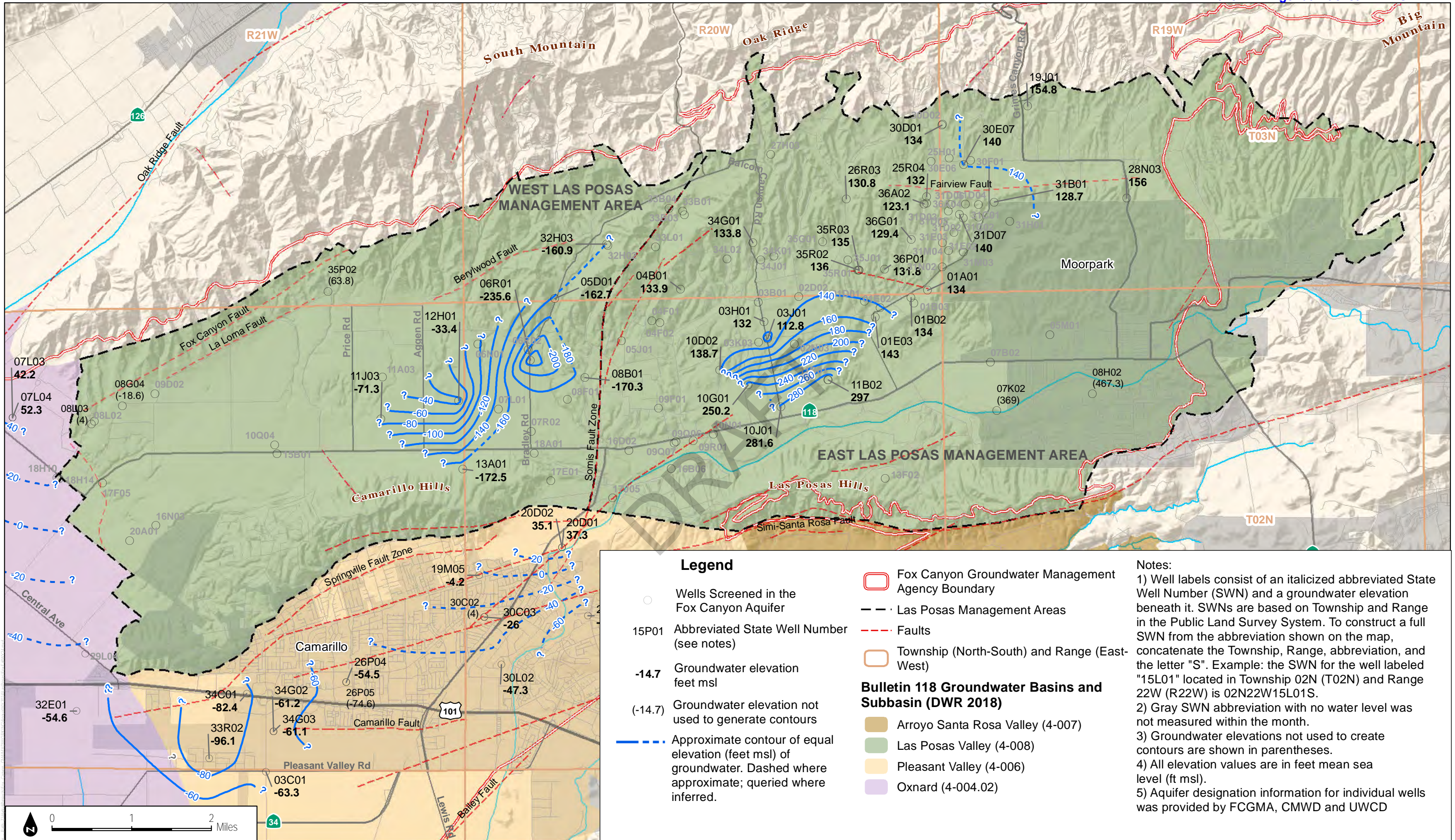
SOURCE: DWR; Ventura County; UWCD; CMWD



FIGURE 2-6
Groundwater Elevation Contours in the Upper San Pedro Aquifer, March 1 to March 31, 2024

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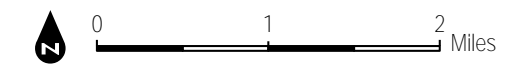
Legend

- 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)
 - Arroyo Santa Rosa Valley (4-007)
 - Las Posas Valley (4-008)
 - Pleasant Valley (4-006)
 - Oxnard (4-004.02)
- Bulletin 118 Groundwater Basins and Subbasin (DWR 2018)**

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



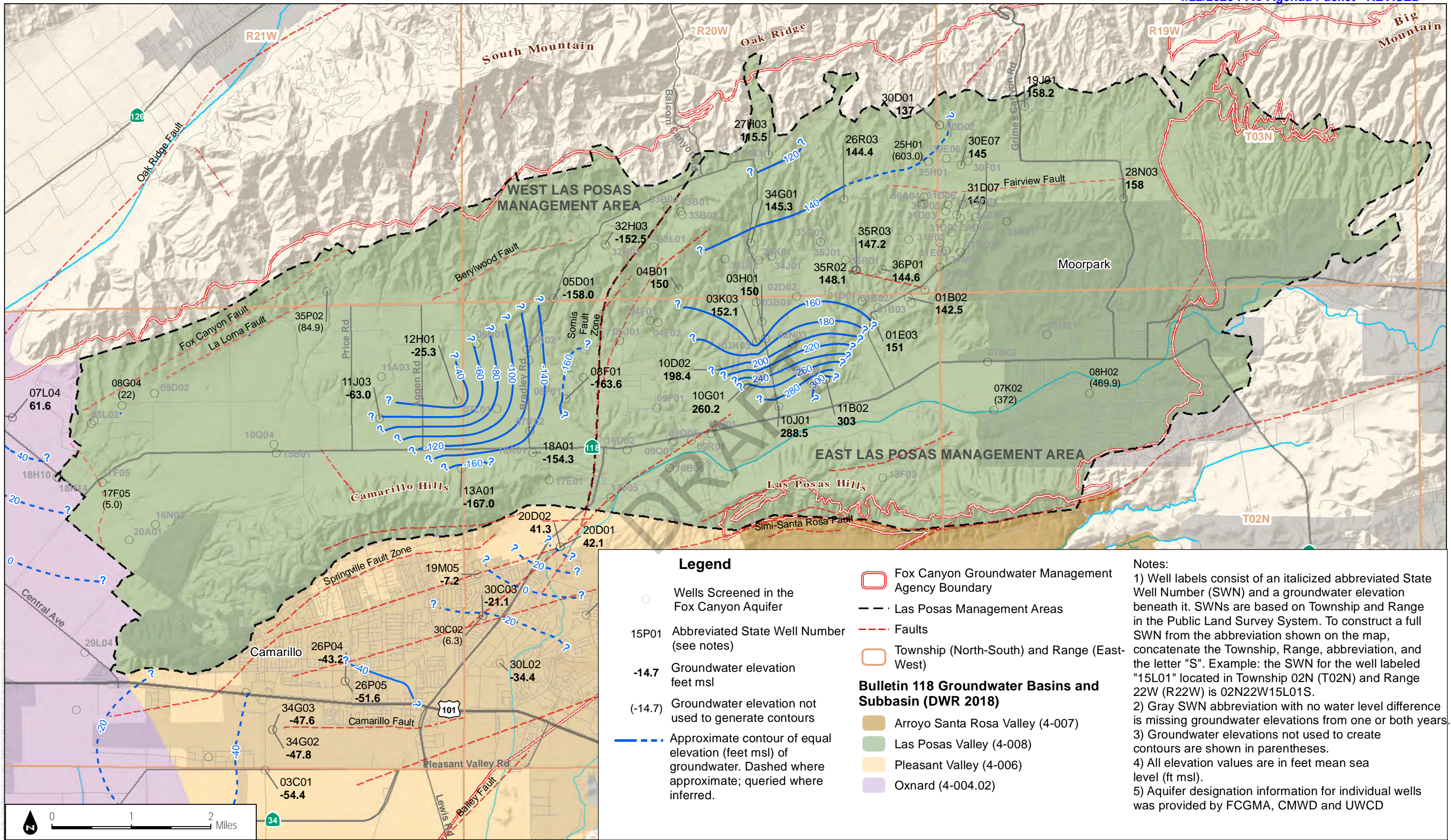
SOURCE: DWR; Ventura County; UWCD; CMWD



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

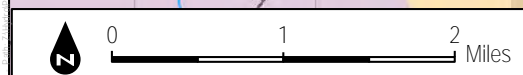
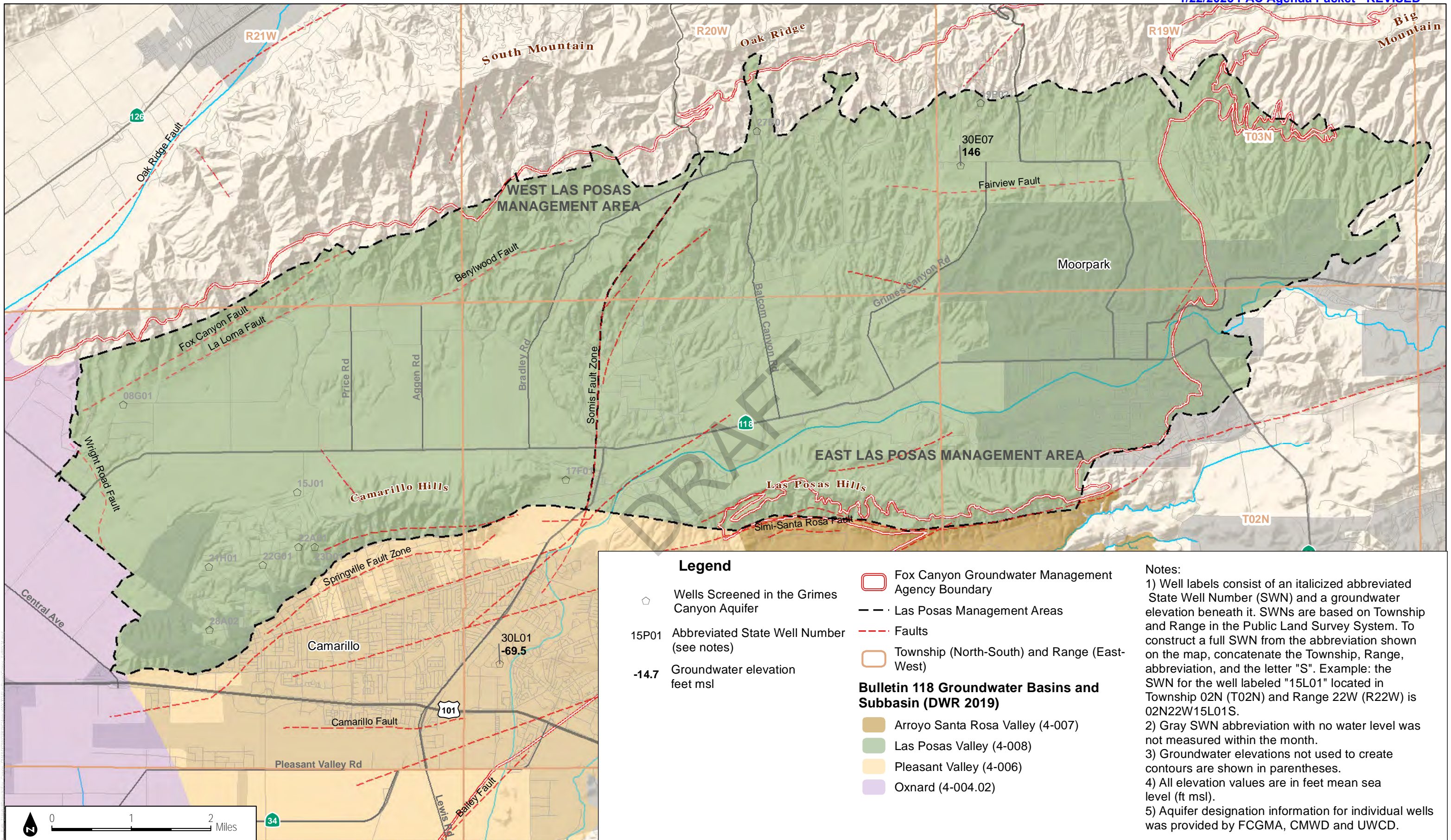
SOURCE: DWR; Ventura County; UWCD; CMWD



FIGURE 2-8
Groundwater Elevation Contours in the Fox Canyon Aquifer, March 1 to March 31, 2024

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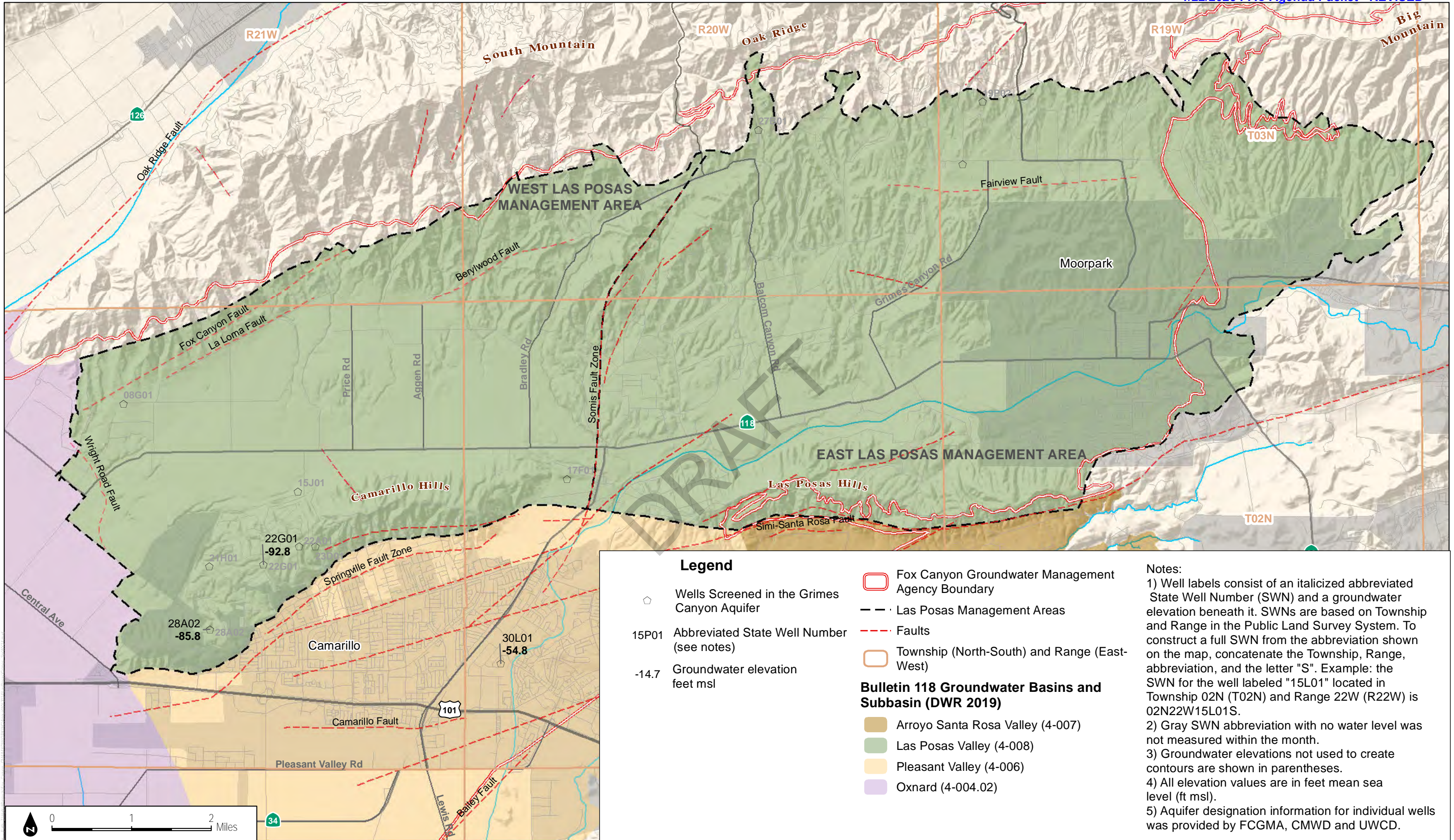
SOURCE: DWR; Ventura County; UWCD; CMWD



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

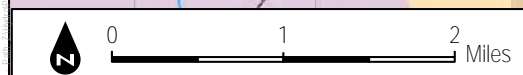
- Fox Canyon Groundwater Management Agency Boundary
- Las Posas Management Areas
- Faults
- Township (North-South) and Range (East-West)

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.



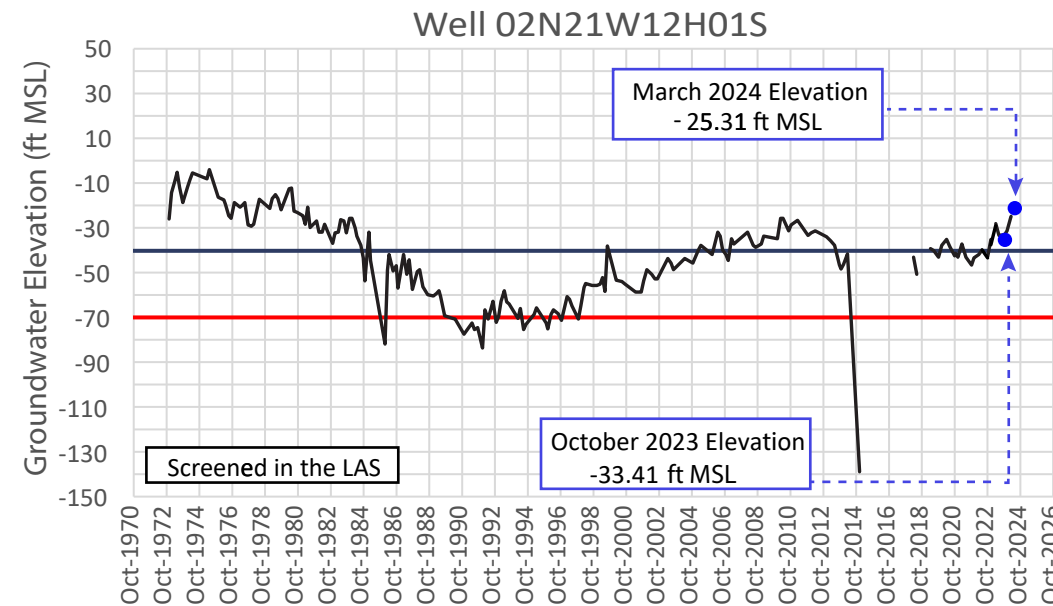
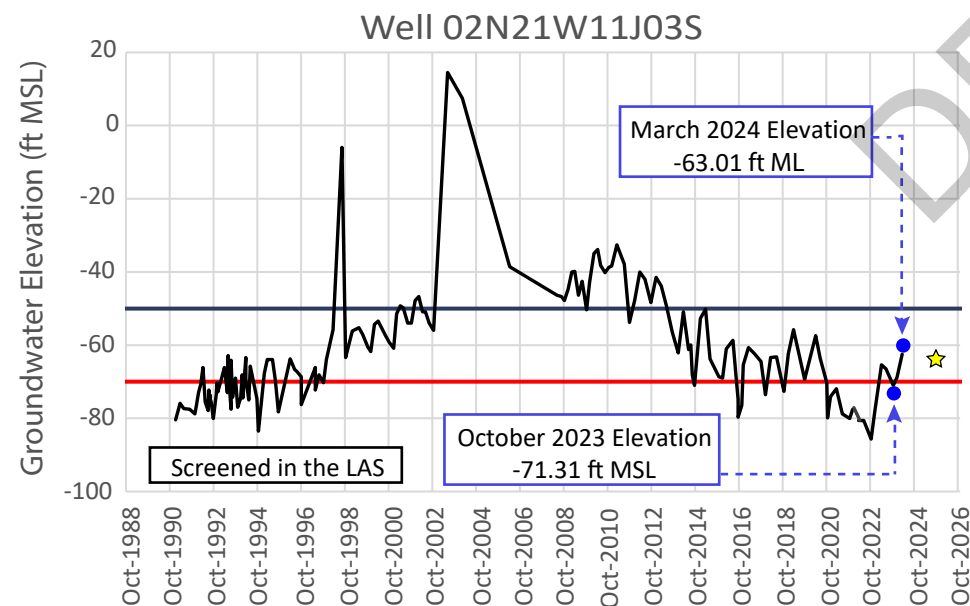
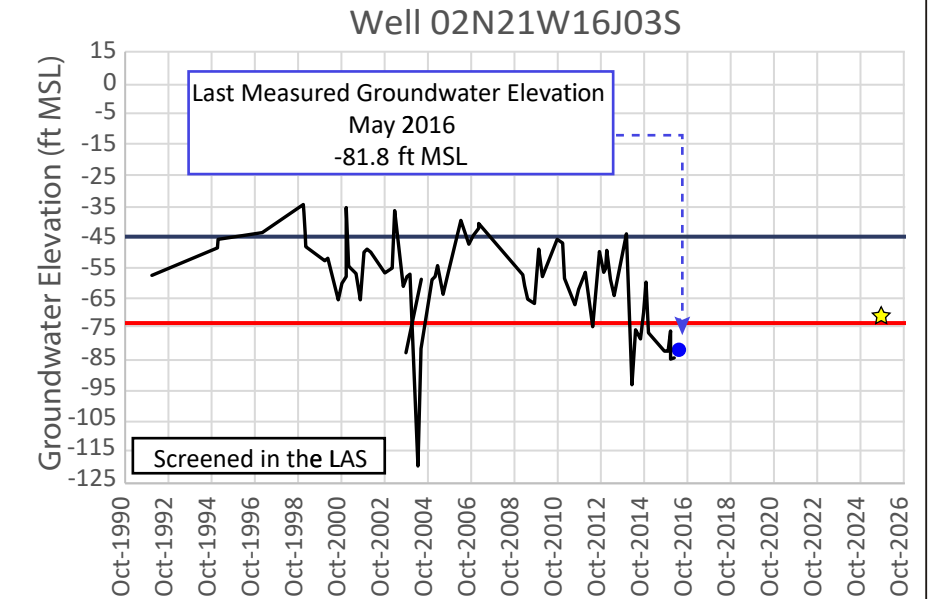
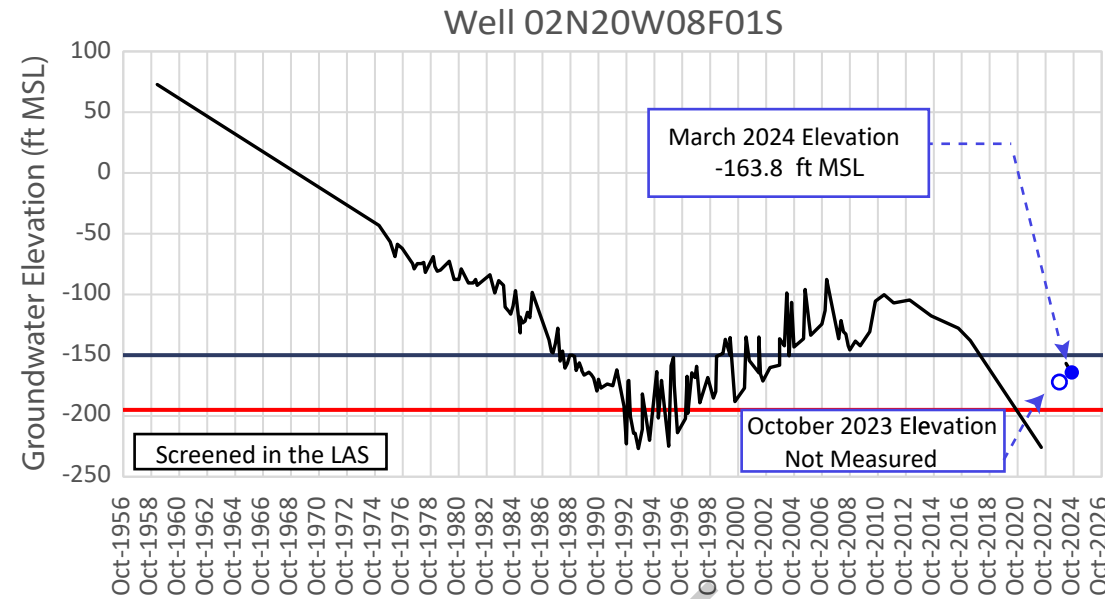
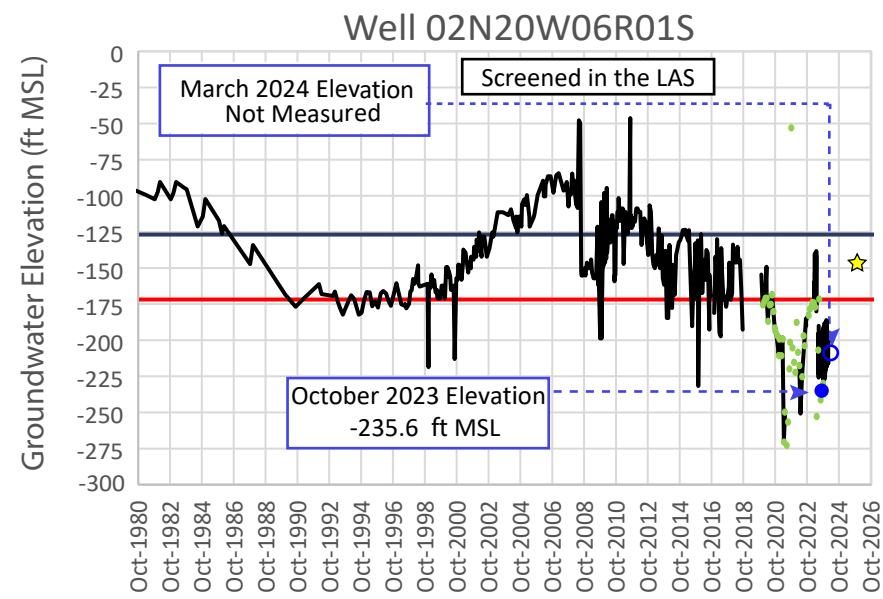
SOURCE: DWR; Ventura County; UWCD; CMWD



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

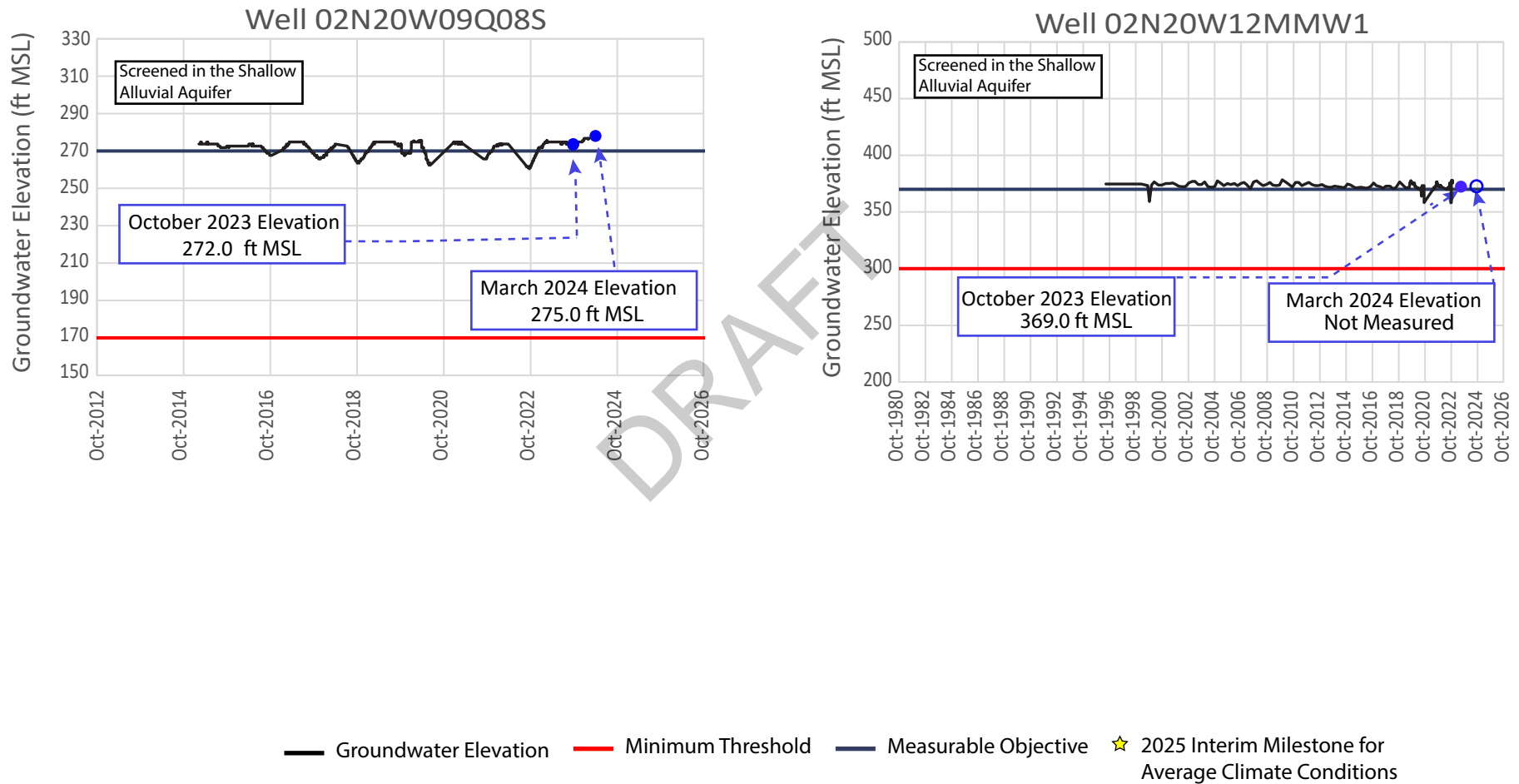
Note: 2025 Interim milestone groundwater elevations are not established for wells where 2015 groundwater elevations were higher than the established minimum thresholds

SOURCE: UWCD, VCWPD

FIGURE 2-11
Groundwater Elevation Hydrographs for Representative Monitoring Points in the West Las Posas Management Area
Las Posas Valley Basin Groundwater Sustainability Plan 2025 Annual Report
Revised Agenda Packet, Page 107 of 186

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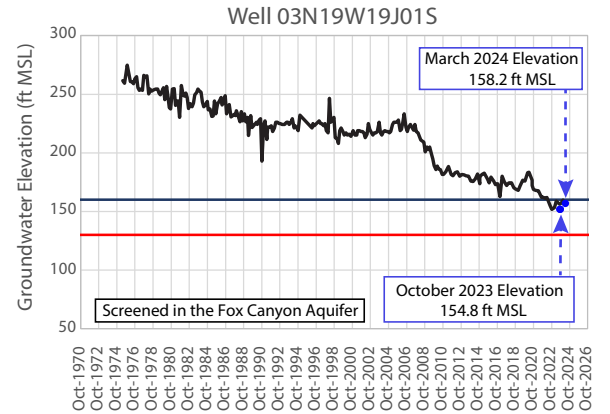
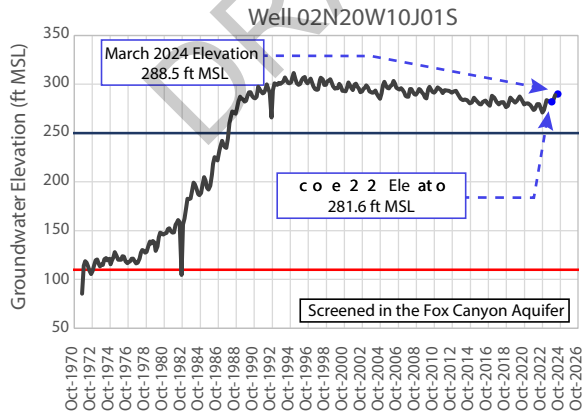
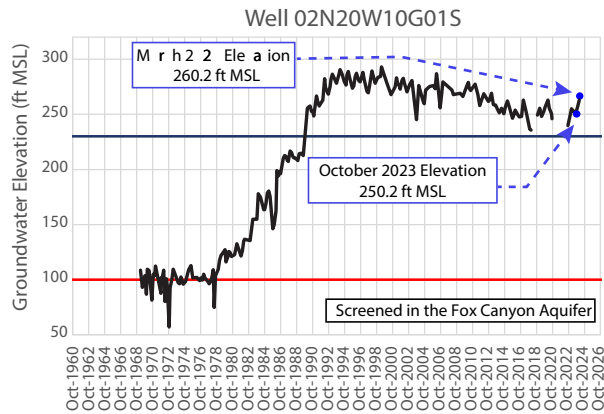
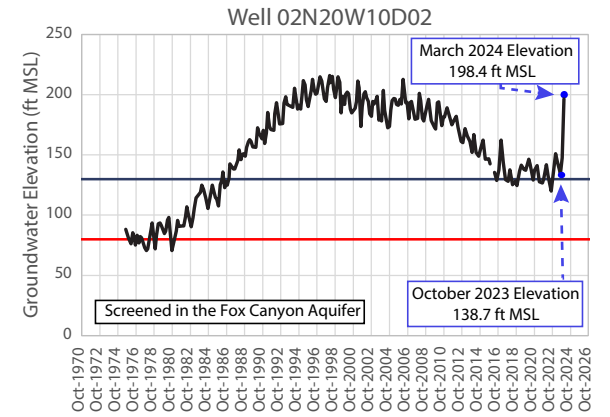
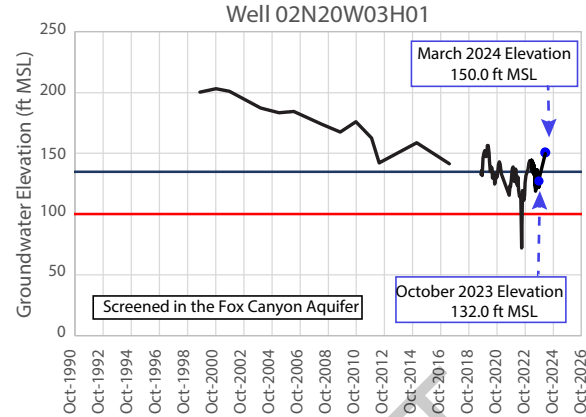
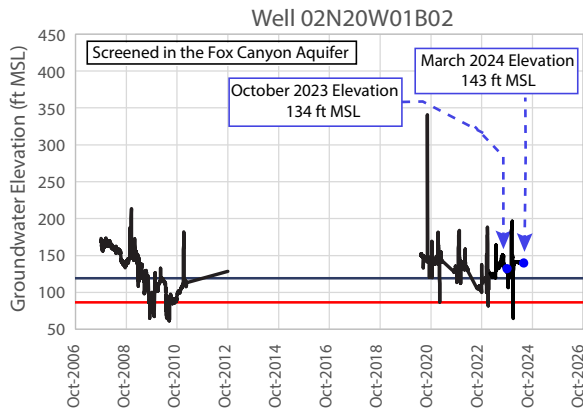
Note: 2025 Interim milestone groundwater elevations are not established for wells where 2015 groundwater elevations were higher than the established minimum thresholds

SOURCE: UWCD, VCWPD

FIGURE 2-12a
 Groundwater Elevation Hydrographs for ELPMA Representative Monitoring Points Screened in the Shallow Alluvial Aquifer

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— Groundwater Elevation — Minimum Threshold — Measurable Objective

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

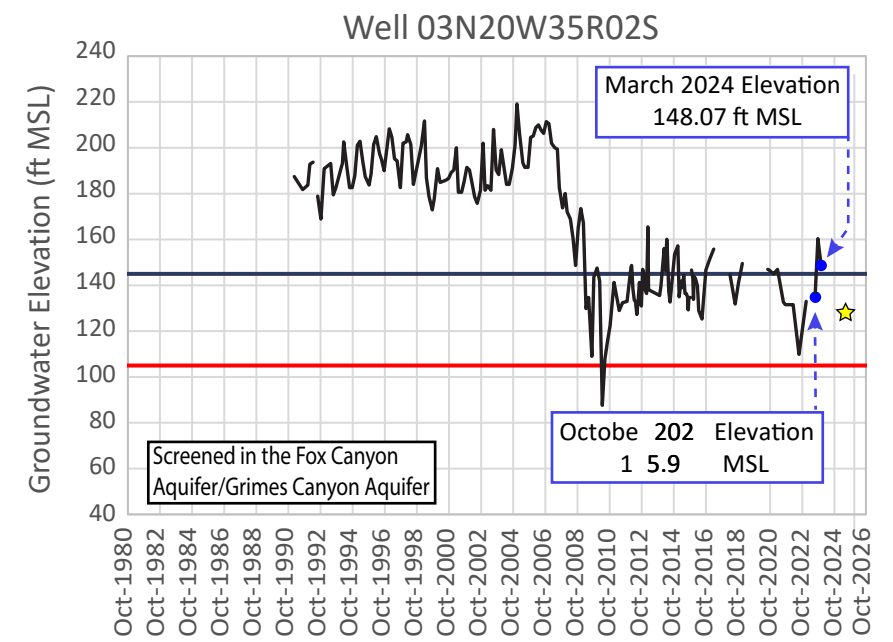
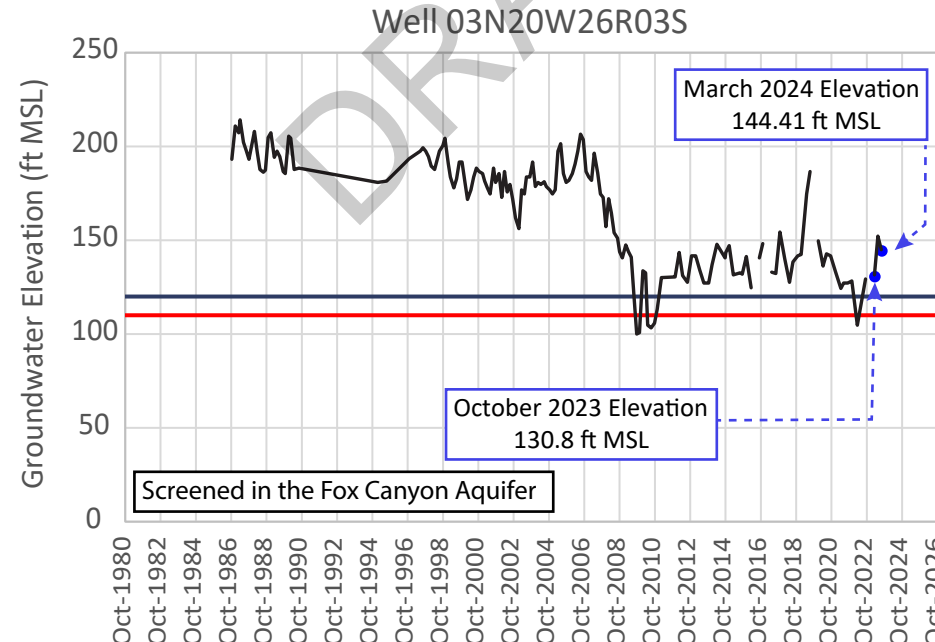
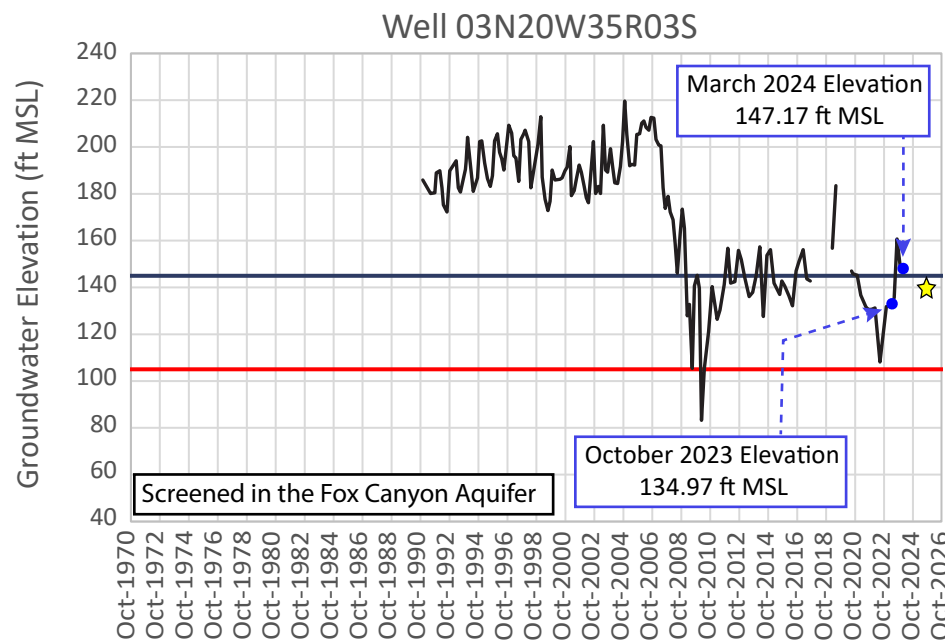
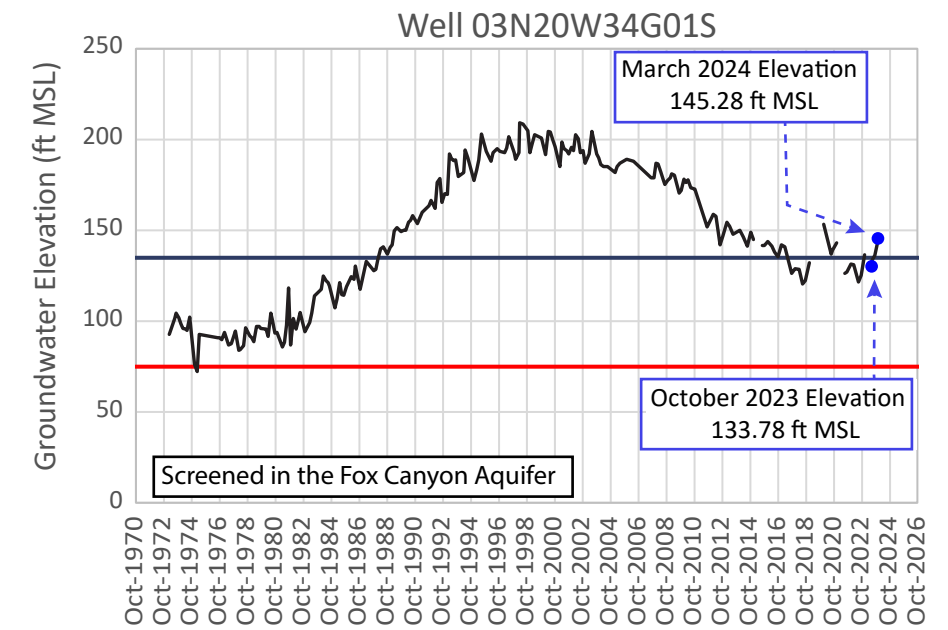
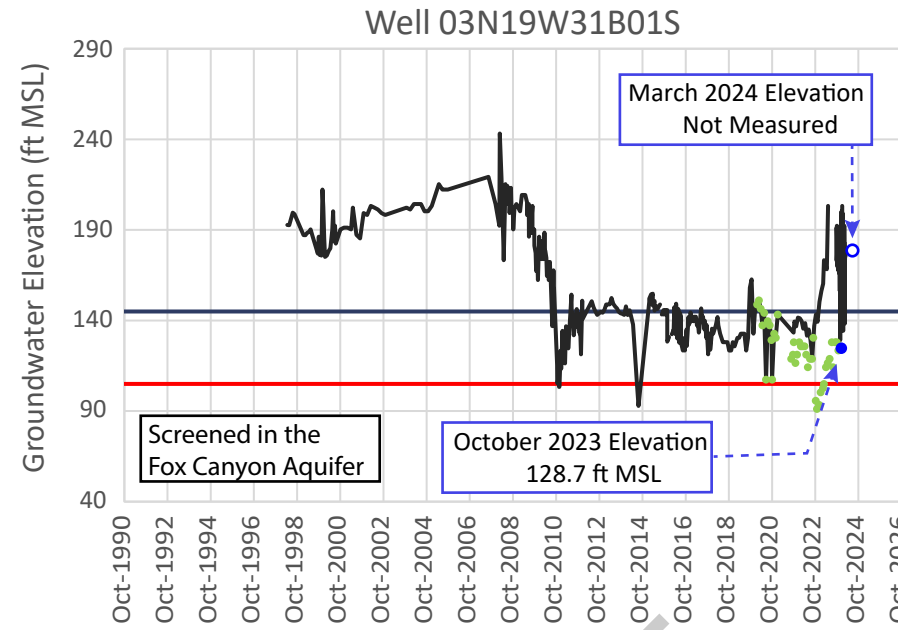
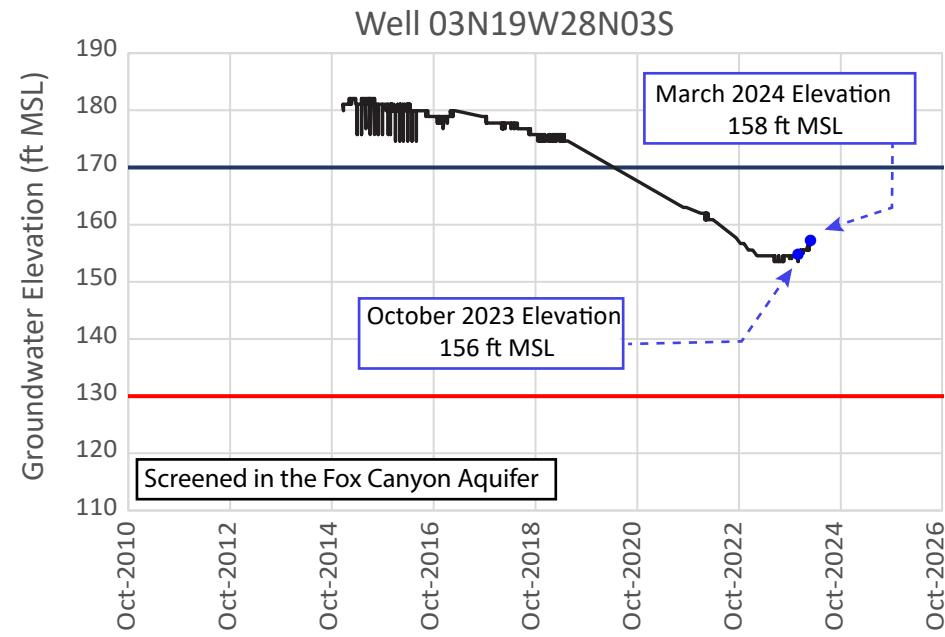
SOURCE: UWCD, VCWPD

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FIGURE 2-12b
 Groundwater Elevation Hydrographs for ELPMA Representative Monitoring Points Screened in the FCA
 Las Posas Valley Basin Groundwater Sustainability Plan 2025 Annual Report

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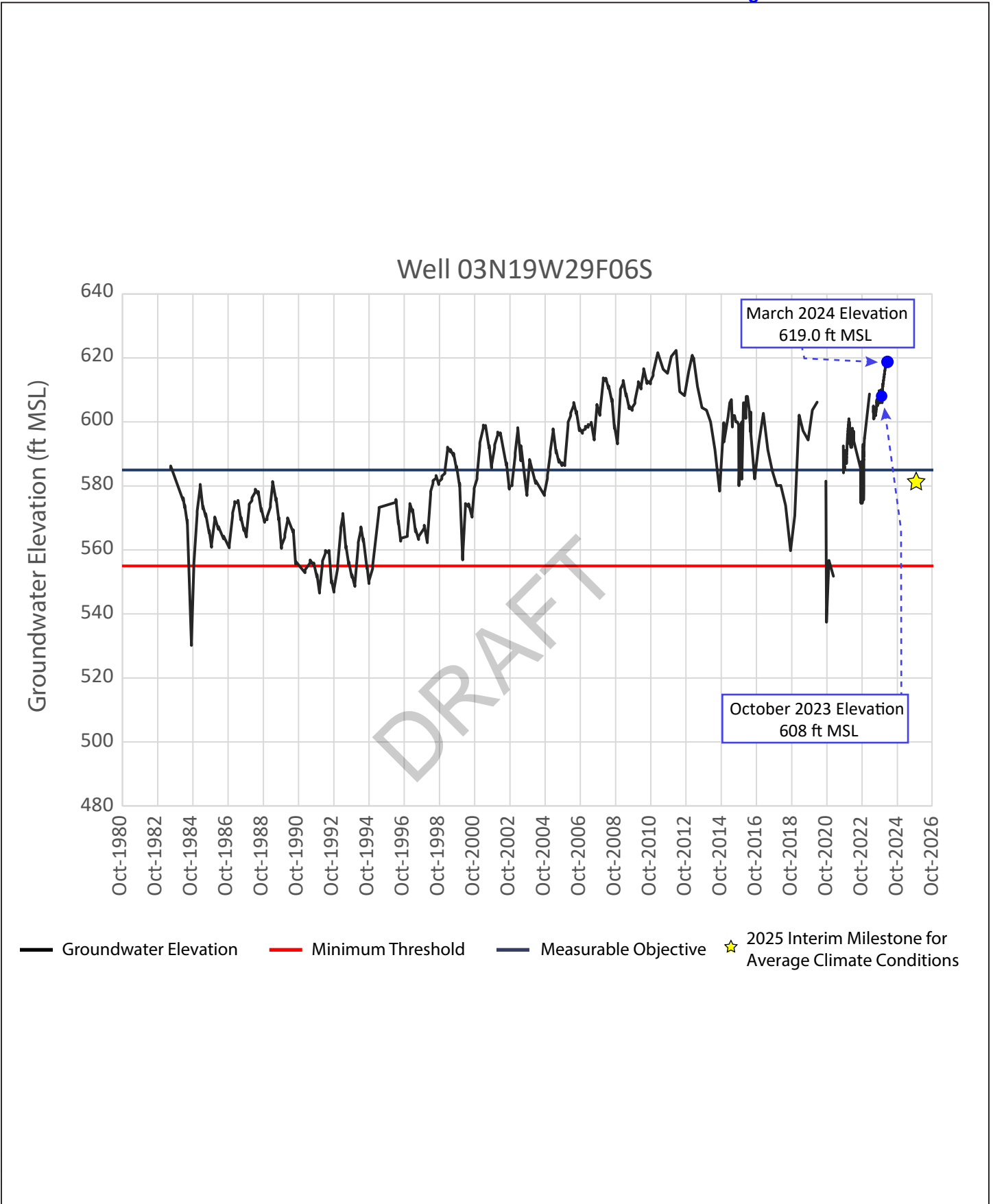
— Groundwater Elevation
 — Minimum Threshold
 — Measurable Objective
 ★ 2025 Interim Milestone for Average Climate Conditions
● VCWWD Manual WLE Measurements

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

SOURCE: UWCD, VCWWD

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SOURCE: UWCD, VCWPD

FIGURE 2-13
Groundwater Elevation Hydrograph for the Representative Monitoring
Points Screened in the Epworth Gravels Aquifer
Las Posas Valley Basin Groundwater Sustainability Plan 2025 Annual Report

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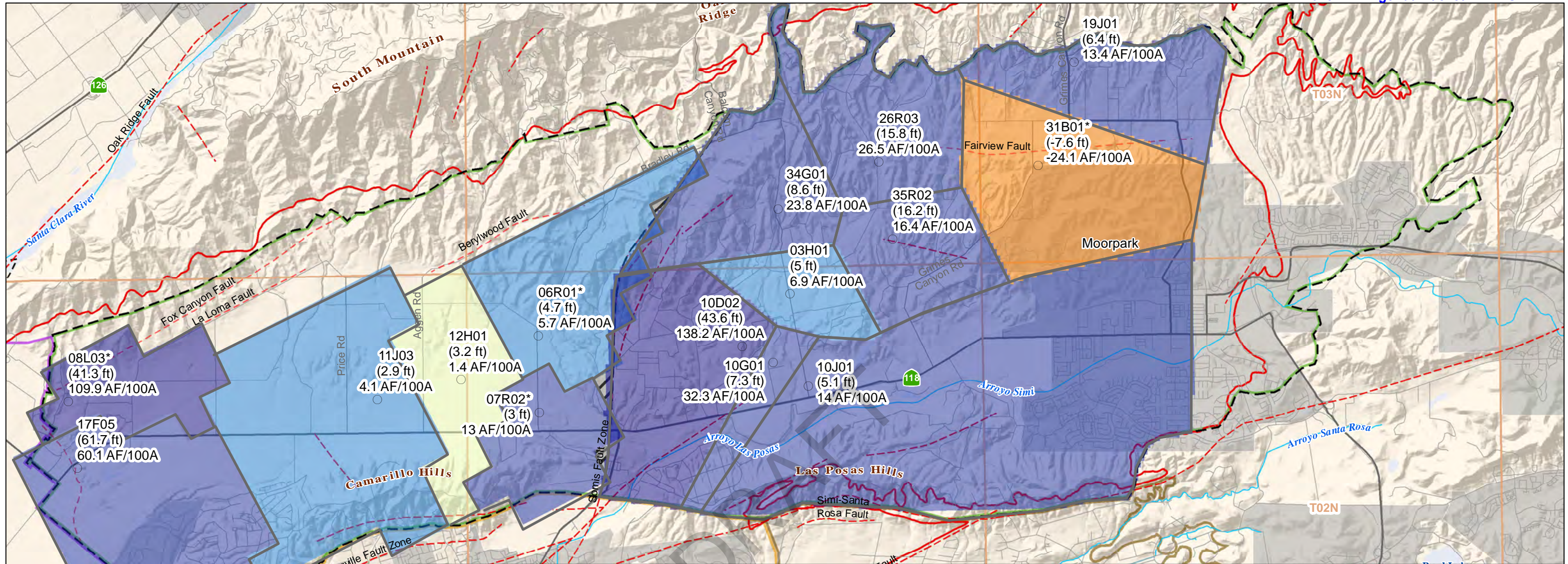
Figure 2-14 Groundwater Production in the Las Posas Valley Basin in Water Year 2024

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

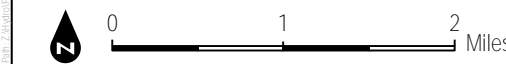
- Storage Change Correlation Wells
- Storage Change Polygons
- Not included in Storage Change Calculation

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.

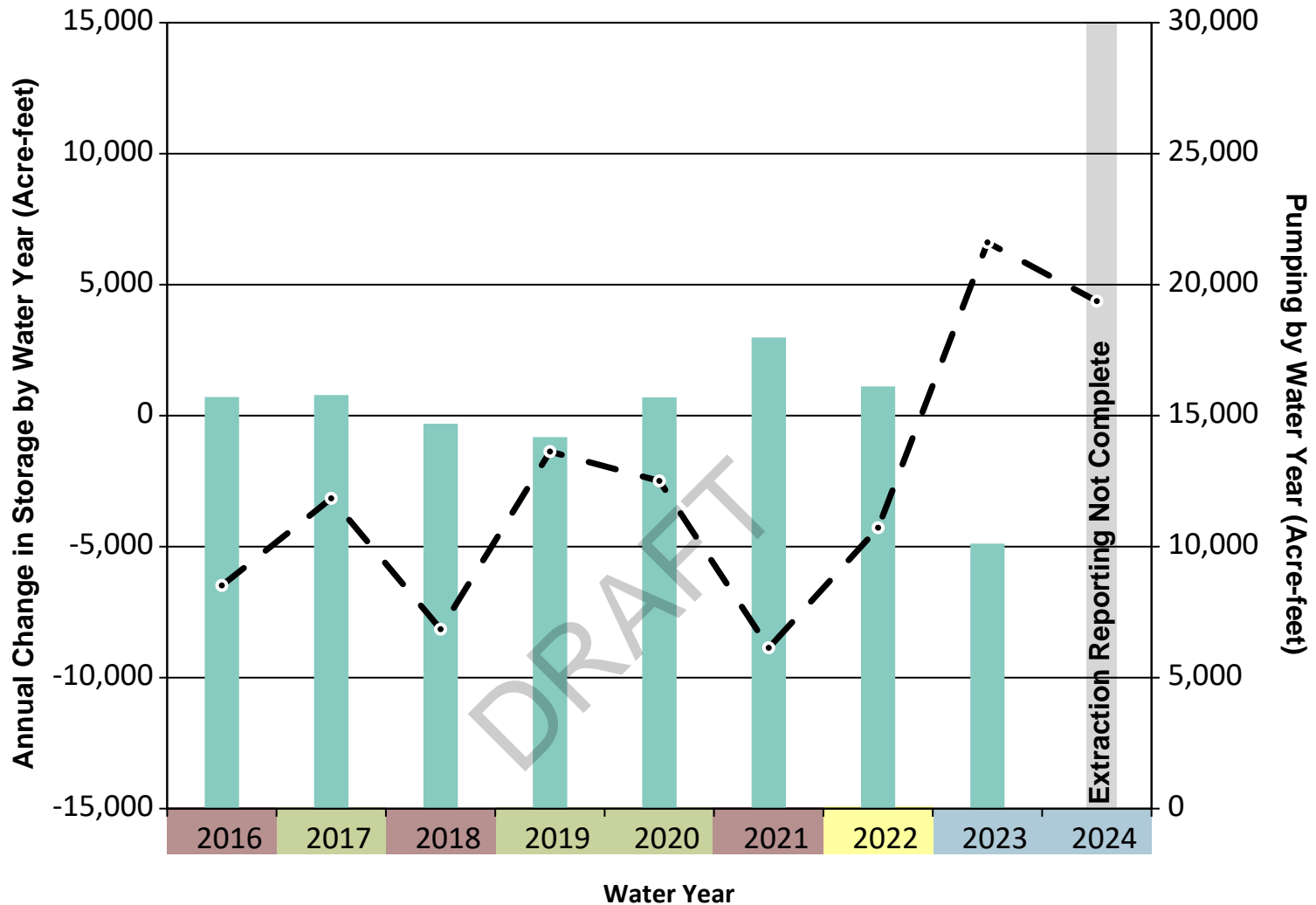
10 AF/100A Change in the volume of groundwater in storage (in units of acre-feet per 100 acres) between spring 2023 and spring 2024. Negative values (-) denote storage declines.

Notes:
 20C05* 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



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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 ($\geq 150\%$ of average), Above Normal ($\geq 100\%$ to $< 150\%$ of average), Below Normal ($\geq 75\%$ to $< 100\%$ of average), Dry ($\geq 50\%$ to $< 75\%$ of average), and Critical ($< 50\%$ of average).

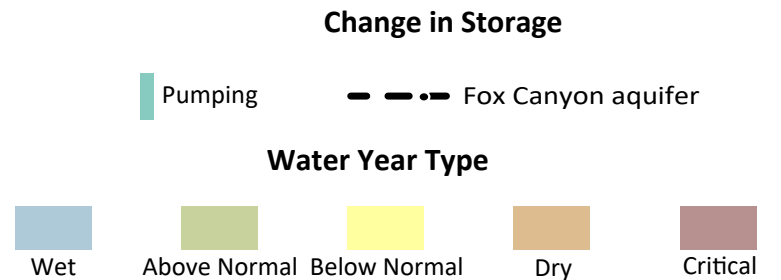


FIGURE 2-16

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

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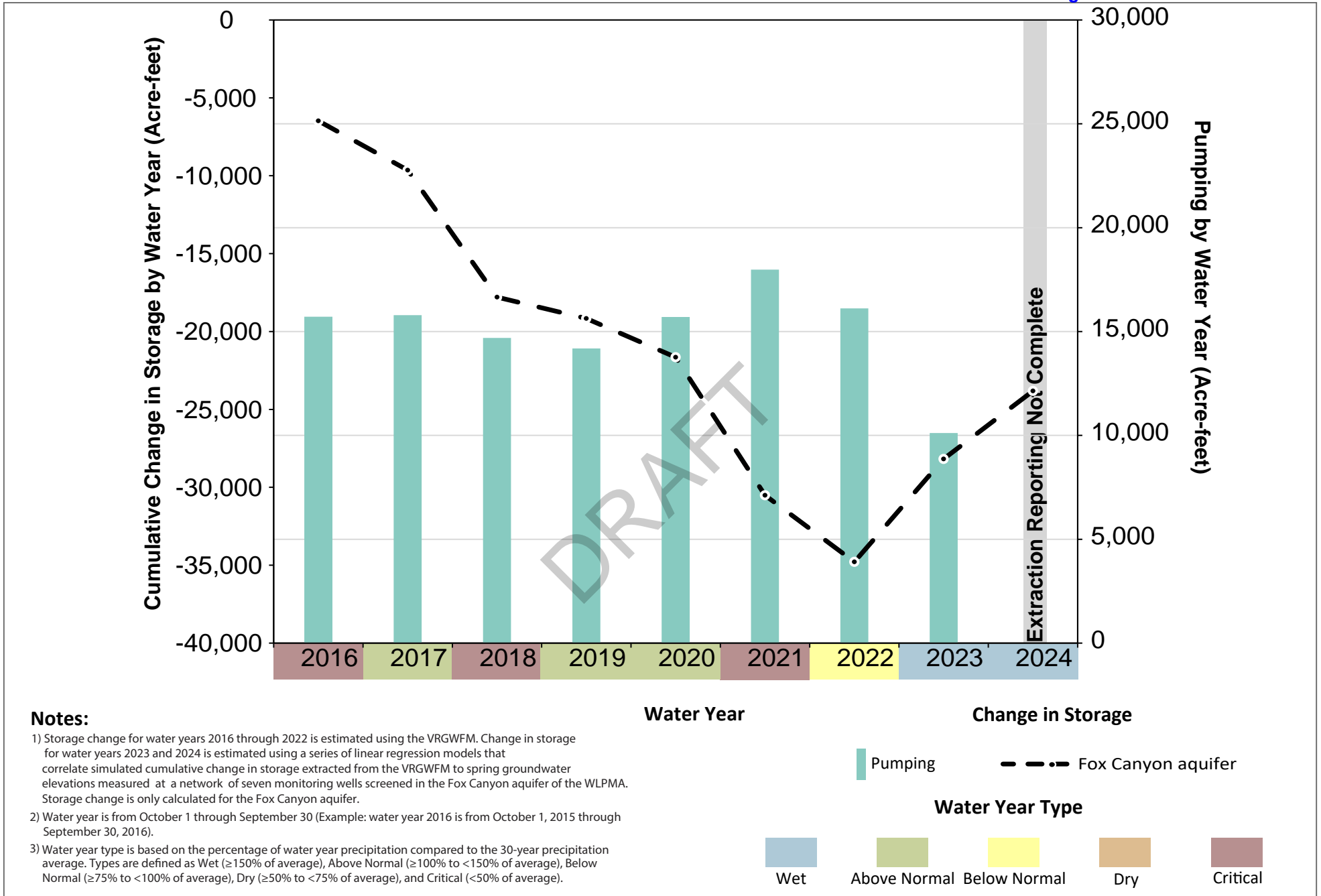
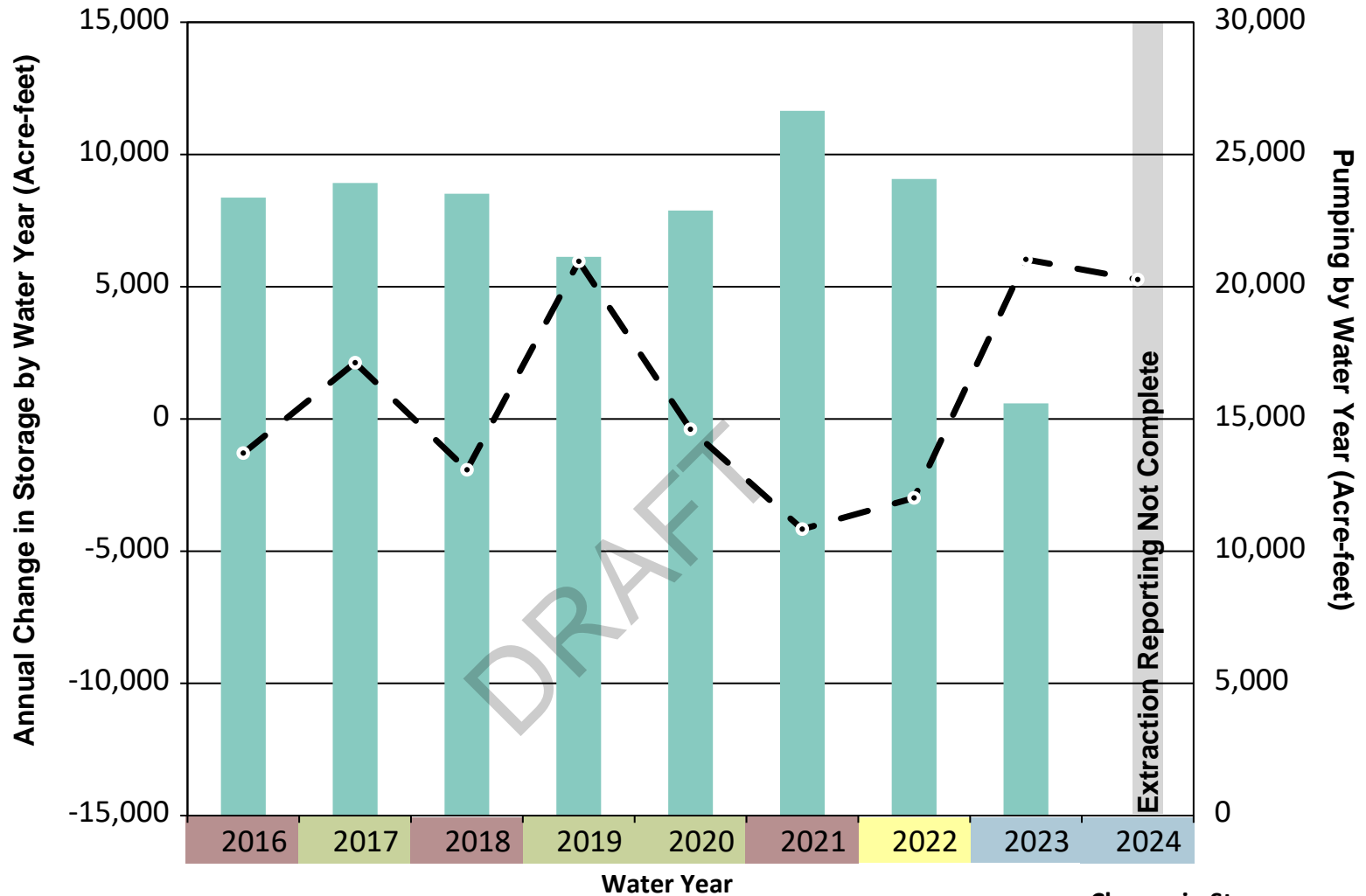


FIGURE 2-17

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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 ($\geq 150\%$ of average), Above Normal ($\geq 100\%$ to $< 150\%$ of average), Below Normal ($\geq 75\%$ to $< 100\%$ of average), Dry ($\geq 50\%$ to $< 75\%$ of average), and Critical ($< 50\%$ of average).

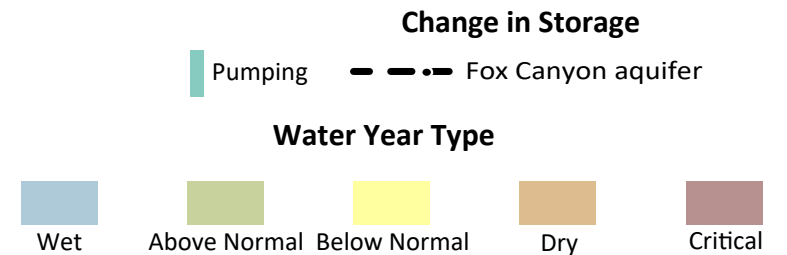
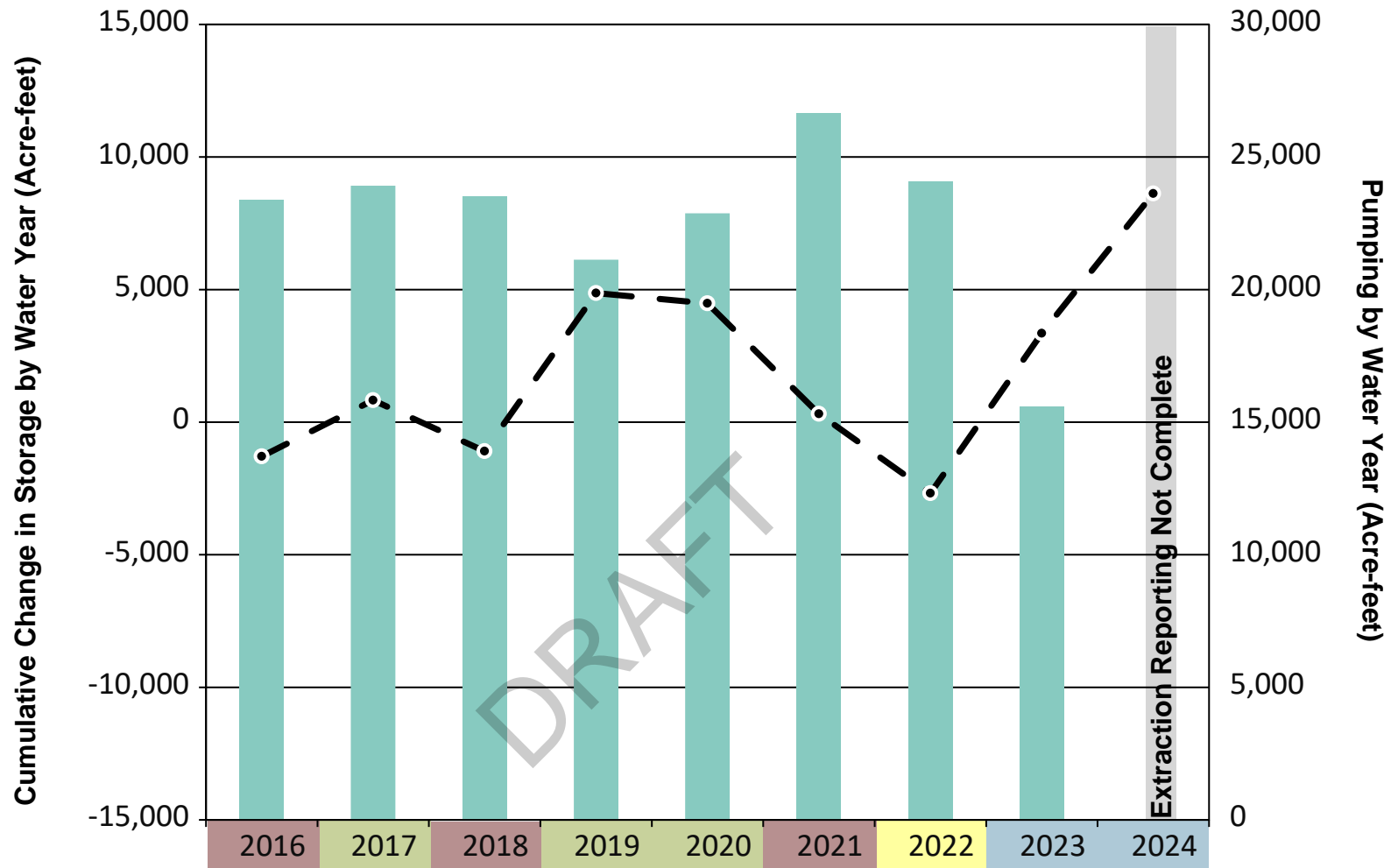


FIGURE 2-18

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

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Notes:

- 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.
- Water year is from October 1 through September 30 (Example: water year 2016 is from October 1, 2015 through September 30, 2016).
- Water year type is based on the percentage of the water year precipitation compared to the 30-year precipitation average. Types are defined as Wet ($\geq 150\%$ of average), Above Normal ($\geq 100\%$ to $< 150\%$ of average), Below Normal ($\geq 75\%$ to $< 100\%$ of average), Dry ($\geq 50\%$ to $< 75\%$ of average), and Critical ($< 50\%$ of average).

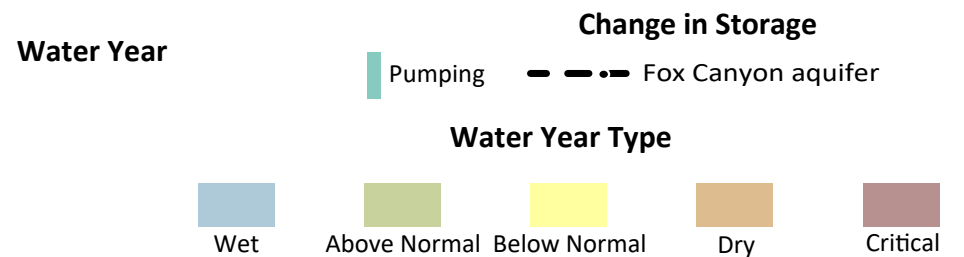


FIGURE 2-19
Water Year Type, Groundwater Use, and Cumulative Change in Storage in the East Las Posas Management Area

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Appendix A

Annual Allocation Accounting

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ANNUAL ALLOCATION ACCOUNTING NOT
AVAILABLE AT TIME OF REPORTING.

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Appendix B

Watermaster Budget

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**Las Posas Valley Basin
Initial Watermaster Budget FY 2023-24¹**

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 Article III	288	\$ 54,144	
Technical Advisory Committee ⁶	6.11, Ex A Article IV	288	\$ 54,144	\$ 86,400
TAC Member Cost ⁷				\$ 259,200
Subtotal - Committee Coordination and Consultations		576	\$ 108,288	\$ 345,600

**Las Posas Valley Basin
Initial Watermaster Budget FY 2023-24¹**

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 Services⁸				
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 Optimization 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 assisting 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.

Resolution 2024-04


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

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Resolution 2024-04

Appendix C

Water Year 2023 Fiscal Report

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FUND: 0171 UNIT: 5796 LPV WATERMASTER	2023-24 ADOPTED BUDGET	ACCUMULATED			EXPENDITURES BY ACCOUNTING PERIOD													
		OBJ	PROG	TOTAL	AP 01	AP 02	AP 03	AP 04	AP 05	AP 06	AP 07	AP 08	AP 09	AP 10	AP 11	AP 12	AP 13	
					7/23	8/23	9/23	10/23	11/23	12/23	1/24	2/24	3/24	4/24	5/24	6/24	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

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

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Appendix E

Updated Groundwater Allocation Schedule

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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 Resplendor 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

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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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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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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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1062	John Moffatt Grether, Trustee of the Helen B. Grether Trust, the GST Exempt Exemption Trust, and the Survivors Administrative 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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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

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)
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-Dayana & 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, Rojalia		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	27.02
		03N20W27H03	
3300	Berylwood Heights Mutual Water Company	02N20W02D02	46.43
		02N20W03B01	
		02N20W03H01	
		03N20W34K01	
3500	Del Norte Water Company	02N21W09D02	40.34
		02N21W09N01	
		02N21W18H01	
		02N21W18H03	
		02N21W18H10	
		02N21W18H12	
		02N21W18H14	
3600	Fuller Falls Mutual Water Company	03N20W35G01	0.00
		03N20W35H03	
3700	La Loma Ranch Mutual Water Company	03N21W35R01	0.00
		03N21W35R02	
3800	Las Lomas Mutual Water Company	03N20W33B01	0.00
		03N20W33B02	
3900	Rancho Canada Water Company LLC	02N20W05J01	0.00
4100	Thermic Mutual Water Company	03N19W29M02	0.00
		03N19W29M03	
		03N19W30J01	
		03N19W30Q01	
4200	Zone Mutual Water Company	02N20W04R03	103.84
		02N20W07R02	
		02N20W07R03	
		02N20W08E01	
		02N20W08F01	
		02N20W08M01	
		02N20W08Q01	
		02N20W09F01	
		02N20W09Q04	
		02N20W09Q05	
		02N20W09Q07	
		02N20W09R01	
Total Mutual Water Company Allocations			217.64

Appendix F

Annual Allocations Calculation

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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 Administrative 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 Hwei-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. Borchart, Jr., Trustee of the John W. Borchart, 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. Borchart, Jr., Trustee of the John W. Borchart, 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, Rojalia		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-Dayam & 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

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. Thiessen, 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				<u>34,332.69</u>	<u>21,400.98</u>	<u>12,931.69</u>	<u>11,485.17</u>	<u>32,886.15</u>		

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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, pledged 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

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

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						<u>6,440.03</u>	<u>6,165.87</u>		

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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

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WY2023-1 Basin Assessment Delinquency List as of 1/15/2025 1/15/2025 PAC 115/2025 Packet - REVISED

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

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