

Las Posas Valley Groundwater Basin Technical Advisory Committee Regular Meeting

Tuesday February 4, 2025, 2:00 PM

Via Zoom:

<https://us02web.zoom.us/j/84168071218?pwd=Kv42H0XegH4TthbvJUgzTrzACgXM8b.1>

Webinar ID: 841 6807 1218

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NOTICE OF MEETING

NOTICE IS HEREBY GIVEN that the Las Posas Basin Technical Advisory Committee (TAC) will hold a regular meeting via Zoom at **2 PM on Tuesday February 4, 2025**.

AGENDA

- A. Call to Order**
- B. Roll Call**
- C. Agenda Review**
- D. Public Comments**
- E. TAC Member Comments**
- F. Regular Agenda**
 - 1. Approve the Minutes of the January 21, 2025 TAC Regular Meeting** (attached, agenda page 3)
 - 2. Recommendation Report Review – Draft Initial Basin Optimization Plan**

The TAC reviewed the Draft Initial Basin Optimization Plan submitted by the Watermaster for Committee Consultation in previous regular meetings. The TAC Administrator has prepared the attached (agenda page 9) draft Recommendation Report summarizing TAC comments on the draft Initial Basin Optimization Plan. The draft Recommendation Report for this consultation request includes comments and recommendations for the Watermaster and their consultant (Dudek) to consider.

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

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

The Watermaster submitted a request for Committee Consultation and review of the draft Las Posas Valley Basin Groundwater Sustainability Plan (GSP) Annual Report Covering Water Year 2024 to the TAC on January 15, 2025. The TAC created a plan for review of the draft Water Year 2024 Annual Report in the January 21, 2025 regular meeting. The draft Annual Report was provided without detailed groundwater use reporting information and the financial audit. These

components of the Annual Report are in progress but are not expected to be available to the TAC prior to the deadline for Recommendation Report submittal on February 15, 2025.

The TAC will discuss their review of the partial draft Annual Report and finalize plans for preparation of a Recommendation Report for submittal to the Watermaster.

4. Update on Committee Consultation Review Schedule

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

Consultation Description	Expected Request Date	Expected Review Due Date
Draft Basin Optimization Plan	12/12/24	2/13/25
Basin Optimization Yield Study Schedule and Alternatives to UWCD Modeling for WLPMA	12/23/24	1/31/25
Presentation of Basin Optimization Yield Study Model Scenarios by Dudek	1/7/25 Regular Meeting	Recommendation Report by 1/21/25
Draft Water Year 2024 Annual Report	1/15/25	2/15/25
Draft Basin Optimization Yield Study	4/1/25	TBD
Calleguas ASR Project Operations Plan	TBD	TBD

5. Schedule for Completing Committee Consultations and Related Recommendation Reports

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

G. Items for Future Agenda

Potential items for future agenda will be considered by the TAC

H. Adjourn

Attachment 1

Minutes of the January 21, 2024 TAC Regular Meeting

Las Posas Valley Groundwater Basin Technical Advisory Committee Regular Meeting

Meeting Minutes
for
January 21, 2025

A. Call to Order

Chair Chad Taylor called the Las Posas Valley Groundwater Basin Technical Advisory Committee (TAC) to order at 2:02 pm.

B. Roll Call

Voting TAC members present (via Zoom):

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

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

- Bryan Bondy – Present
- Kimball “Kim” Loeb – Present

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

C. Agenda Review

Mr. Taylor asked for comments from TAC members or the public on the agenda, which was published by the Watermaster on January 17, 2025. No members of the TAC or public attendees were made.

D. Public Comments

Chair Taylor provided an opportunity for public comments on items not on the agenda. Steve Murata, Policy Advisory Committee (PAC) member representing West Las Posas Mutual Water Company asked if someone from the TAC could attend a PAC meeting and explain the technical difference between a dedicated monitoring well and an active production well that is used for monitoring. Vice Chair Tony Morgan volunteered to provide this information to the PAC in his capacity as the PAC Administrator. No other comments were received.

E. TAC Member Comments

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

F. Regular Agenda

1. Approve the Minutes of the January 7, 2024 Regular Meeting

Mr. Taylor asked for TAC member discussion and/or comments on the minutes for the January 7, 2024 regular TAC meeting. There was discussion and no changes or corrections were identified.

MOTION: Dr. Abrams moved to approve minutes of the January 7, 2024 TAC Meeting

SECOND: Vice Chair Morgan seconded the motion

VOTE: Unanimously approved

2. Recommendation Report Review – Basin Optimization Yield Study Schedule

Mr. Taylor invited the TAC to provide comments and discussion on the draft Recommendation Report for the Basin Optimization Yield Study Schedule included in the meeting agenda. TAC members asked if a specific period for additional review should be added to the recommendation that the schedule allow for flexibility in the TAC model simulation result review. The text of this recommendation was modified to request the TAC have the option to request additional review time. The TAC also discussed the statement of support for the Watermaster in securing an agreement with United Water Conservation District to model Basin optimization with the existing Coastal Plain groundwater model. The TAC decided to modify this language and remove reference to potential problems with multiple models of the same area. Mr. Taylor shared his computer screen to show the TAC members the changes to the Recommendation Report as they discussed them.

Mr. Taylor asked for public comment on the Recommendation Report and Richard Cavaletto asked about the potential for disagreement between multiple models and the veracity of the existing Coastal Plain Model and the confidence in that model. Mr. Loeb answered that United Water Conservation District and their independent panel of modeling experts review the model and found it to be an appropriate tool for simulating groundwater conditions in the Coastal Plain. Mr. Loeb further stated that for the Las Posas Valley Basin Groundwater Sustainability Plan (GSP) an uncertainty analysis was completed that showed reasonable results. While all models are imperfect, Mr. Loeb stated that the existing Coastal Plain Model is the best tool available for simulating the West Las Posas Management Area. Mr. Morgan further explained that when there are two models of the same area it would be expected that the results be similar without producing exactly the same numerical results in all cases.

No additional public comments were made.

Mr. Taylor asked the TAC members if they were comfortable voting on the Recommendation Report on the Basin Optimization Yield Study Schedule and if there were any dissenting opinions that should be added to the report. No discomfort or dissenting opinions were raised.

MOTION: Mr. Taylor moved to approve the Recommendation Report – Basin Optimization Yield Study Schedule Consultation Request as amended during the meeting

SECOND: Vice Chair Morgan seconded the motion

VOTE: Unanimously approved

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

Chair Taylor advanced to review and discussion of the draft Recommendation Report on the Basin Yield Study modeling approach. He reminded meeting attendees that Dudek provided a presentation on this topic at the previous TAC meeting and TAC members made comments at that time. The Recommendation Report captures those comments, which were:

1. Consider iteratively adjusting in lieu deliveries when simulating projects that supply alternative water supplies to specific areas of the Basin
2. Include in lieu deliveries to northern east Las Posas Management Area in modeling approach
3. Track and report changes in outflow to pleasant valley basin for all simulations

4. Use recent historical trends in Moorpark water reclamation facility percolation rates to develop model inputs
5. Consider assessing effects of variable pumping reduction across the Basin
6. Consider running additional simulations for West Las Posas Management Area with the Oxnard Extraction Barrier Brackish Water Treatment Project

TAC members agreed the Recommendation Report captures the comments and recommendations on the modeling approach.

Mr. Bondy and Mr. Morgan provided limited specific text edits to recommendations 2 and 5 that Mr. Taylor made during the meeting.

Mr. Taylor asked for public comments on this Recommendation Report; none were received.

MOTION: Dr. Abrams moved to approve the Recommendation Report – Basin Optimization Yield Study Modeling Approach Consultation Request as amended

SECOND: Vice Chair Morgan seconded the motion

VOTE: Unanimously approved

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

Mr. Taylor turned to the new committee consultation request submitted to the TAC, review of the draft Las Posas Valley Basin Groundwater Sustainability Plan (GSP) Annual Report Covering Water Year 2024. This document was sent to the TAC January 15, 2025 and a Recommendation Report is due to the Watermaster by February 15th. The draft annual report is incomplete and is missing tabulated water use by party to the Judgment, which the Watermaster is still working on, and financial auditing information. This information is not likely to be provided to the TAC prior to the review deadline.

The TAC discussed the review period and developed a plan for developing comments, recommendations, and a Recommendation Report. In this discussion the TAC decided to schedule a special meeting on February 11th to allow for more time for TAC members to review the draft and provide comments and then have the Administrator prepare a Recommendation Report for review in the special meeting. To meet these deadlines, the TAC will discuss comments on the draft Annual Report in the regular meeting February 4th, TAC member comments will be due to the Administrator in tabular format by February 6th, and a draft Recommendation Report will be prepared by February 10th for inclusion in the special meeting agenda. Mr. Taylor asked the Watermaster staff to prepare to assist by publishing the special meeting agenda.

Mr. Loeb informed the other TAC members that much of the water year 2024 annual report is similar to previous annual reports and much of it is not necessarily technical but is required by SGMA and/or the Judgment.

No public comments were received.

5. Ongoing Committee Consultation– Draft Basin Optimization Plan

Chair Taylor went on to the ongoing discussion of the Draft Basin Optimization Plan (dBOP), thanking the other TAC members for providing their comments. Those comments were included in the agenda.

Mr. Taylor indicated that the comments will be incorporated into a Recommendation Report for review in the next regular TAC meeting.

No public comments were received.

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

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

Mr. Loeb reiterated that the Watermaster appreciated the TAC's thoughtful review. The Watermaster attempted to provide self-explanatory responses line-by-line to the TAC's comments and recommendations.

Mr. Bondy indicated that some of the comments and recommendations were not comprehensively addressed because there was not sufficient time. Mr. Bondy relayed a specific question from stakeholders who ask what the real effect on seawater intrusion pumping in West Las Posas Management Area has. He noted this will continue to be a point of concern and confusion for stakeholders and other items that the TAC raised that the Watermaster did not have time to address may have similar concern for stakeholders.

Mr. Loeb responded that the Watermaster would like to address more of these items in the future when there is more time.

Mr. Bondy asked the Watermaster to consider how the TAC can be engaged earlier in the process. He stressed this was not a criticism, by perhaps the TAC could help earlier in the evaluation process in the future. Other TAC members agreed.

No public comments were provided on this item.

7. Update on Committee Consultation Review Schedule

Mr. Loeb informed the TAC that the items on the schedule table in the agenda are all correct and that the only additional upcoming consultation is the Basin Optimization Yield Study, anticipated to be delivered April 1st.

Mr. Morgan noted that the Calleguas ASR study group is still being formed and that the PAC is planning to reach out to potential candidates.

No public comments.

8. Schedule for Completing Committee Consultations and Related Recommendation Reports

Mr. Taylor reviewed the plan for completing current consultations. He noted two consultations:

1. Draft Basin Optimization Plan: A Recommendation Report is due February 13th. TAC members have provided comments that will be incorporated into a draft Recommendation Report for review in the February 4th regular meeting.
2. Draft Water Year 2024 Annual Report: Discussion will take place on February 4th, comments in tabular form using the Microsoft Excel format previously circulated due

February 6th, draft Recommendation Report for review in a special meeting February 11th.

No public comments received.

G. Items for Future Agenda

TAC members had no items for future meeting agenda.

Richard Cavaletto made a public comment in the meeting chat requesting page numbers with references to attachments or some other means of locating attached documents when the agenda is long. Mr. Taylor indicated he will consider the best way to assist readers in locating items in the agenda, potentially including hyperlinks or pdf page numbers.

H. Adjourn

Mr. Taylor moved to adjourn at 3:37 PM

MOTION: Chair Taylor moved to adjourn the meeting

SECOND: Vice Chair Morgan seconded the motion

VOTE: Unanimously approved

Attachment 2

Draft TAC Consultation Recommendation Report, Draft Initial Basin Optimization Plan, January 30, 2025

LAS POSAS VALLEY TECHNICAL ADVISORY COMMITTEE

January 30, 2025

RECOMMENDATION REPORT

To: Las Posas Valley Watermaster

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

Re: Recommendation Report – Draft Initial Las Posas Valley Basin Optimization Plan Consultation Request

The Las Posas Valley Watermaster Technical Advisory Committee (TAC) provides this Recommendation Report on the Draft Initial Las Posas Valley Basin Optimization Plan Consultation Request. The Las Posas Valley Basin Watermaster (Watermaster) submitted a committee consultation request to the TAC on December 12, 2024 and the TAC discussed the Draft Basin Optimization Plan (dBOP) in regular TAC meetings on December 17, 2024, January 7, 2025, and January 21, 2025. The TAC members provided specific comments on the dBOP in tabular formats in the agenda for the January 21st meeting. Those specific comments are attached to this Recommendation Report and form the basis for the recommendations presented herein.

TAC RECOMMENDATIONS

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

TAC members question whether the dBOP presents a complete plan for evaluation of optimization of the Las Posas Valley Basin (LPVB). While the dBOP appears to meet the letter of the Judgment, it may not address the underlying goal presented in the Judgment to "optimize" the basin by seeking to identify means of augmenting Basin Optimization Yield to be no less than 40,000 acre-feet per year (AFY). Given that the yield of the LPVB (both Basin Optimization Yield and Sustainable Yield) are dependent on avoiding undesirable results, optimizing yield should consider focusing on projects that maximize water supply augmentation in areas of the LPVB where undesirable results are likely under baseline conditions (i.e., the eastern West Las Posas Management Area and northern East Las Posas Management Area). Assessment of yield optimization without prioritizing projects that directly benefit these areas and address current and historical localized water level depressions risks misapplying effort with limited potential benefit.

1.1 Recommendations:

Consider reworking the project scoring methodology to award points to projects that address areas where undesirable results are likely already occurring. Specifically:

- Rework item 14 of the project scoring methodology to award more points for projects that address areas where modeling shows that undesirable results are likely under baseline conditions or add a 15th scoring criteria that specifically addresses project location in relation to undesirable results.
- Alternatively, divide proposed projects in two groups within the dBOP so that projects that address areas where modeling shows that undesirable results are likely under baseline conditions are scored separately from those that may increase water supply availability and/or augment yield in other areas of the LPVB.
- Reframe the BOP to include more context regarding the need for optimization and narrative explanations of how each project and the prioritization approach addresses groundwater sustainability conditions at local, management area, and basin-wide scales. Include clear language describing how the proposed projects will address sustainability conditions.

1.2 Technical Rationale for Recommendation:

Sustainability in the LPVB is not solely a function of the basin-wide water budget. Increasing potential inflow to the basin-wide water budget in areas where current and historical conditions do not require augmentation does not directly address conditions in areas where undesirable results are occurring. This potential misalignment of effort is compounded when the problems exist in areas of the LPVB that are either poorly connected to or disconnected from the areas of augmentation. In those cases the problem areas will either have limited or no benefit from the augmentation projects.

1.3 Summary of Facts in Support of Recommendation:

- Only one of the highly ranked projects has the potential to directly effect the areas of undesirable results in the eastern West Las Posas Management Area (WLPMA).
- The sole project designed to address conditions in the northern East Las Posas Management Area (ELPMA) is poorly ranked.
- Many of the projects propose to augment water available for recharge in areas of the LPVB with high groundwater levels, limiting the volume of additional recharge that could occur.
- Optimization should include iterative evaluation of projects at different scales to assess the optimal suite and scale of projects that would maximize basin yield.

2. RECOMMENDATION 2: REVISE HOW PROJECTS DEPENDENT ON OTHER PROJECTS ARE PRESENTED AND PRIORITIZED

There are multiple projects dependent on one or more other projects. While there is a scoring metric for a project's dependency on other projects, as approved by the TAC, there is not a corollary scoring metric to increase the priority of projects on which other projects depend. For example, the Moorpark Desalter (Project 4) is a critical project because the full

benefits of three other projects (1, 3, and 5) depend on lowering groundwater levels in the Shallow Aquifer around the Arroyo Simi-Las Posas. The Moorpark Desalter extraction wells will accomplish this reduction of groundwater levels, which will provide space in the Shallow Aquifer for additional groundwater recharge. Consequently, Project 4 should be included in the Basin Optimization Yield Study (BOYS). These dependencies on Project 4 do not appear to have been made explicit in previous documents provided to the TAC.

2.1 Recommendations:

- Consider revisiting how interdependent projects are prioritized so that project on which other projects depend are prioritized at least as highly as those that depend on them.
- Include modeling of Project 4 in conjunction with the projects that depend on it in the BOYS.
- Prior to such modeling, the TAC should be provided with supporting information that demonstrates the ELPMA model is sufficiently calibrated and robust to evaluate water level changes associated with the Moorpark Desalter extraction wells, if such information does not already exist.
- Consider including other factors on which projects in the dBOP depend, such as brine disposal for Project 4.
- Consider adding a graphic that visually conveys project interdependencies.

2.2 Technical Rationale for Recommendation:

The current and future BOYS will set the Operating Yield and Rampdown Rate through 2039. Waiting for future BOYS to realize the maximum benefits of other projects will cause delays in maximizing the Operating Yield.

The interdependencies between projects are not emphasized adequately in the document. The most significant example of this is Project 4, the Moorpark Desalter. Benefits of Projects 1, 3 and 5 are not fully realized unless the Moorpark Desalter project is implemented, but the desalter project is not among the prioritized projects and is not proposed for inclusion in the BOYS (Table 3).

2.3 Summary of Facts in Support of Recommendation:

- Evaluating projects for which success is dependent on other projects without also evaluating the projects on which they depend would be an incomplete assessment of basin optimization.
- Modeling Project 4 is essential at this early stage of project implementation; the BOP states that the full effectiveness of three other projects will likely not occur without the Desalter in operation.
- The projects dependent on the Moorpark Desalter to create more storage space in the shallow aquifer may actually be competing for the same storage space. Until the desalter project is modeled and the amount of storage space is reasonably estimated, it is impossible to assess whether projects 1, 3, and 5, that all propose to increase surface water flows to be captured by in the shallow aquifer, are viable.

3. RECOMMENDATION 3: REVIEW AND ADDRESS APPARENT INCONSISTENCIES IN WATER SUPPLY / YIELD BENEFITS

TAC members identified multiple instances of inconsistent quantification of water supply benefits for projects in the dBOP. These inconsistent quantifications included assigning benefits to projects dependent on other projects without specifically addressing those dependencies (as described in Recommendation 2), presentation of the maintenance of existing conditions as a future benefit, and apparent misunderstandings or ineffective presentation of project effects on the LPVB water budget. If benefit quantification is undertaken the scoring of affected projects should be revisited.

3.1 Recommendations:

- Reconsider how the benefits from projects that are dependent on other projects are presented and scored. If the project on which another project depends does not move forward, then the benefits of the dependent project will not be realized. This recommendation applies to Projects 1, 3, and 5.
- Revise how the benefits associated with Project 4 are described. The current description indicates that pumping 6,720 AFY will increase recharge by 2,200 AFY, which was called out by three of the four reviewing TAC members as confusing or incorrect.
- Revise the water supply / yield augmentation benefit of Project 6 from the volume of diverted water to the volume of avoided evapotranspiration losses associated with current transfer methods.
- Revise how the benefits of projects that continue existing conditions and/or practices are quantified. This applies to Projects 1 and 5.

3.2 Technical Rationale for Recommendation:

- As discussed in Recommendation 2, the benefit from a project that is dependent on another project cannot be realized without implementing both projects. Projects 1, 3, and 5 are presented and scored assuming that Project 4 will be implemented. However, Project 4 is not proposed for consideration in the dBOP. Either the presentation, scoring, and prioritization should be modified so that Project 4 is moved forward to the BOYS or the benefits and scoring of Projects 1, 3, and 5 should be revised to lower values appropriate for current conditions.
- The water supply / yield augmentation benefit of Project 4 is incorrect. Assuming the values of pumping and additional recharge presented in the text are correct, the actual water supply / yield augmentation benefit of Project 4 is the difference between project pumping and increased recharge, which is -4,070 AFY (note: the negative sign indicates that, as a standalone project, it would simply increase ELPMA groundwater pumping by 4,070 AFY without an offsetting increase in recharge). However, the 2,200 AFY of increased recharge is based on old information about Simi inflows to the ELPMA, which have declined significantly in recent years. Because Simi inflows have decreased, the amount of increased recharge induced by the project is likely less than 2,200 AFY under present and anticipated future conditions. Thus, the unmitigated groundwater pumping increase would likely be

more than 4,070 AFY. While it may be possible to increase pumping by some amount in this part of the Basin without triggering additional undesirable results that should be quantified with modeling as described in Recommendation 2.

- For Project 6, diverting 3,000 AFY of recycled water from Simi Valley for pipeline delivery would reduce the amount water that percolates into ELPMA along the arroyo. The actual water supply benefit of Project 6 is equal to the amount of avoided evapotranspiration losses along the arroyo. The sustainable yield increase would depend on where the water is delivered, with maximal benefit for delivery to one or both areas of the Basin where modeling shows that undesirable results are likely under baseline conditions (i.e., eastern WLPMA and northern ELPMA) and minimal benefit elsewhere.
- Project 5 will not increase the sustainable yield of ELPMA because it proposes to maintain existing recharge sources that are already accounted for in the sustainable yield.

3.3 Summary of Facts in Support of Recommendation:

- The benefit from a project that is dependent on another project cannot be realized without implanting both projects.
- Increasing pumping as proposed for Project 4 to induce recharge does not represent an increase in water supply when the volume of expected recharge is less than the volume of pumping.
- The water supply benefit of Project 6 is equal to the amount of avoided evapotranspiration losses along the arroyo.
- Project 5 will not increase the sustainable yield of ELPMA because it proposes to maintain existing recharge sources that are already accounted for in the sustainable yield.

4. RECOMMENDATION 4: CONSIDER REVISING AND ADDING TO DISCUSSION OF BENEFITS TO AND IMPACTS ON WATER QUALITY FROM PROJECTS

TAC members are concerned that several of the proposed projects may continue or worsen water quality impacts from recharging poor quality water along the Arroyo-Simi Las Posas. The GSP indicates that historical inflow from Simi Valley and percolated treated wastewater have caused high salt concentrations in the ELPMA. It is unclear how Projects 4 and 5 will improve groundwater quality by inducing additional recharge from these same sources.

4.1 Recommendations:

- Include evaluation of water quality impacts and potential for benefits in the BOP and/or BOYS.
- Further clarify how water quality is expected to improve by implementing Project 4

4.2 Technical Rationale for Recommendation:

Projects 4 and 5 include pumping in an area of elevated salinity to provide additional storage space for recharging from the same source of poor quality water that caused the elevated salinity. Optimization of the LPVB yield should not include only adding water to the

basin but also improving water quality such that beneficial uses and users have access to more high-quality groundwater.

4.3 Summary of Facts in Support of Recommendation:

- The dBOP description of Project 5 indicate that potential impacts to water quality are unknown.
- Water quality in the area of Projects 4 and 5 has historically been impacted by inflows from Simi Valley and percolated treated wastewater at the Moorpark Water Reclamation Facility.

5. RECOMMENDATION 5: INCLUDE IN LIEU DELIVERIES TO NORTHERN EAST LAS POSAS MANAGEMENT AREA (PROJECT 7) IN MODELING APPROACH

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

This recommendation was also provided in response to the Committee Consultation request for the Basin Optimization Yield Study Modeling Approach submitted to the Watermaster on January 21, 2025.

5.1 Recommendations:

The TAC recommends reevaluating the scoring for Project 7 to prioritize it similarly to Project 2. Specific details of locations of in lieu deliveries and available volumes should be coordinated with the Waterworks District.

5.2 Technical Rationale for Recommendation:

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

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

5.3 Summary of Facts in Support of Recommendation:

- The northern ELPMA has historically exhibited significant groundwater elevation declines
- Groundwater elevations in the ELPMA indicate that the area is not well connected to regional recharge from the Arroyo Simi-Las Posas
- A local approach to addressing water level declines in this area is necessary to achieve sustainability
- An in lieu project could be modeled with rough estimates of in lieu water availability and application locations using an iterative approach to optimize benefits

6. RECOMMENDATION 6: RECONSIDER HOW PROJECTS WITHOUT SPECIFIC WATER SUPPLY BENEFITS ARE CONSIDERED

The TAC noted that there are projects without specific water supply, augmentation, or yield improvement benefits included in the dBOP. While we understand that these are projects included in the GSP and/or Judgment and were assessed in the dBOP as a result, we do not know that they fit in the dBOP as presented. Given that the dBOP is intended to set the stage for the projects evaluated in the BOYS, it makes sense that projects without basin yield benefits would not score well or be given high priority. However, members of the TAC commented that these data gap filling projects have other benefits that should not be ignored when considering whether or not to move them forward. These comments and recommendations are specifically directed to Projects 9 and 10, which include construction of dedicated monitoring wells and equipping monitoring wells with transducers for better water level data collection. While these projects do not have the potential to add yield to the LPVB, they are a mechanism for tracking groundwater conditions, identifying trends, and avoiding undesirable results in the basin.

6.1 Recommendations:

Consider evaluating data gap filling Projects 9 and 10 separately from the other projects in the BOP and advancing them without including them in the BOYS.

6.2 Technical Rationale for Recommendations

Increased monitoring cannot directly increase the operational or sustainable yield of a groundwater basin. However, it is a critical component of sustainable management of groundwater resources. Without routine, reliable, and accurate monitoring of groundwater elevations and quality it is impossible to assess, maintain, or achieve groundwater sustainability.

6.3 Summary of Facts in Support of Recommendations

- Projects 9 and 10 do not have the potential to increase the operational yield of the LPVB.
- Historical monitoring of groundwater elevations in the LPVB has been less consistent and widespread than would be expected for a high use and dynamic groundwater system.

- Adding dedicated groundwater monitoring wells and better data collection tools will benefit the LPVB in the long-term.

7. RECOMMENDATION 7: REEVALUATE PROJECT SCHEDULE CONSIDERING TAC MEMBER COMMENTS

TAC members commented that the schedule presented in Appendix C is too short for some projects and perhaps too long for others. We also noted that the schedule does not clearly identify which projects are proposed for advancement or the relationship between projects.

7.1 Recommendations:

Consider comments and recommendations in the attached tabular summary.

7.2 Technical Rationale for Recommendations

See individual comments and recommendations regarding schedule in the attached tabular summary.

7.3 Summary of Facts in Support of Recommendations

See individual comments and recommendations regarding schedule in the attached tabular summary.

8. RECOMMENDATION 8: REEVALUATE PROJECT COST ESTIMATES AND PRESENTATION CONSIDERING TAC MEMBER COMMENTS

TAC members provided multiple comments, questions, and recommendations regarding the presentation of project costs. These comments identified missing cost estimate information for multiple projects, inconsistent presentation of costs, potential underestimates of costs, and omission of important cost components including operations and maintenance, funding mechanisms, future rate increases, etc. Consistent and complete cost estimate information is important for evaluating projects when costs are included in the prioritization criteria.

8.1 Recommendations:

Consider comments and recommendations in the attached tabular summary, including:

- Include all cost components for each project in a consistent format in the text and tables.
- Include capital expenses, operating expenses, and other costs for each project.
- Include reasonable changes in rates for unit based components of long-term projects.
- Describe likely funding mechanisms for each project, including both capital and operating expenses.

8.2 Technical Rationale for Recommendations

See individual comments and recommendations regarding costs in the attached tabular summary.

8.3 Summary of Facts in Support of Recommendations

See individual comments and recommendations regarding costs in the attached tabular summary.

9. RECOMMENDATION 9: ACKNOWLEDGE AND PRESENT PLANS FOR CONSIDERING POTENTIAL EFFECTS ON NEIGHBORING BASINS

Potential impacts on neighboring basins are not well described in the dBOP. While these potential impacts may not be known until additional analysis is completed, the possibility of impacts to neighboring basins should be acknowledged in the dBOP.

9.1 Recommendations:

Add a subsection addressing the potential to impact neighboring basins for each project and describe how those potential impacts will be evaluated prior to project implementation.

9.2 Technical Rationale for Recommendations

SGMA requires consideration of and coordination with neighboring basins when assessing groundwater conditions, establishing sustainable management criteria, and planning for projects and management actions.

9.3 Summary of Facts in Support of Recommendations

Multiple projects included in the dBOP include changes to local and/or regional surface and groundwater flows. The potential for these changes to effect neighboring groundwater basins should be acknowledged and assessed.

10. RECOMMENDATION 10: REVIEW EDITORIAL COMMENTS PROVIDED BY TAC IN TABULATED COMMENT MATRIX

The TAC members each prepared detailed tabulated comments numbered by commentor with references to specific section and page numbers and quoted text. Many of these comments are editorial in nature and identify apparent errors in the dBOP, including typographic and formatting errors and unclear text.

10.1 Recommendations:

Consider revising the text to address the comments identified as editorial and clarification in the attached tabular comment matrix.

10.2 Technical Rationale for Recommendation:

See individual editorial comments for rationale.

10.3 Summary of Facts in Support of Recommendation:

A summary of facts for this recommendation is not applicable.

TALLY OF COMMITTEE MEMBER VOTES

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

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

REPORT OF BASES FOR MAJORITY AND MINORITY COMMITTEE MEMBER POSITIONS

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

Attachment 1

TAC Member Comments on the Draft Initial Basin Optimization Plan

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

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

Specific Comments from the Las Posas Valley Basin Technical Advisory Committee

Draft Initial Las Posas Valley Basin Optimization Plan

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

MEMORANDUM

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

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

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

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

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



re: **DRAFT** Comments on Draft Initial BOP

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

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

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

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

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

Watermaster also requested specific commentary on:

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



re: *DRAFT Comments on Draft Initial BOP*

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

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

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

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