LAS POSAS BASIN POLICY ADVISORY COMMITTEE MEETING

NOTICE OF MEETING

NOTICE IS HEREBY GIVEN that the Las Posas Basin Policy Advisory Committee (PAC) will hold a **HYBRID** meeting at **3:00 P.M**. on **Thursday, February 6, 2025.**

In Person:

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

via ZOOM:

https://us06web.zoom.us/j/84816327542?pwd=Y-bN4zt674FOphU6wRyxXw9swYTgvA.9bNuXf3yWWBZyrae

Webinar ID: 848 1632 7542 | Passcode: 400774

AGENDA

A. Call to Order

B. Roll Call

C. Agenda Review

D. Public Comments

E. PAC Member Comments

F. Regular Agenda

1. **Approve the minutes of the January 22, 2025 Regular Meeting**

2. **Basin Optimization Yield Study Revised Schedule**

   On December 23, 2024, Watermaster notified the PAC of the need to extend the schedule for the Basin Optimization Yield Study (BOYS). The PAC discussed the proposed revised schedule at the January 22, 2024 meeting and developed recommendations to adjust the revised schedule. The PAC will consider approval of the draft Recommendation Report.

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

   On December 12, 2024, Watermaster submitted to the PAC for committee consultation the Draft Initial Las Posas Valley Basin Optimization Plan (BOP). The amended Watermaster Rules give the PAC 63 days from submittal to provide a Recommendation Report.

   At its January 9, 2025 meeting, the PAC discussed initial reactions to the draft BOP. Since then, PAC members have submitted comments to the PAC Administrator that were compiled into a draft Recommendation Report. This draft Recommendation Report was reviewed at the January 22, 2024 PAC meeting and suggestions for improvement were provided to the Administrator. Those suggestions were used to revise the draft Recommendation Report into the version attached with this agenda.

   The PAC will review the revised draft PAC Recommendation Report and consider approval of the report.

4. **Watermaster Budget**

   The PAC will discuss how to engage in the budgeting efforts and identify priorities for engagement with FCGMA/WM. Part of this discussion includes how United Water Conservation District fees paid by landowners in the West Management Area of the LPV are accounted for.

G. PAC Subcommittee Reports

PAC representatives on subcommittees will provide reports

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

H. Written Communication

1. Email from Farai Kaseke, FCGMA/Watermaster staff, regarding the BOYS modeling contract

I. Future Agenda Items

The PAC will consider items for future agendas.

J. Adjourn

Attachments:

1. **F-1 PAC 2025-01-22 Meeting Minutes**
2. **F-3 Draft PAC Recommendation Report on Revised BOYS Schedule**
3. **F-4a Revised DRAFT PAC Recommendation Report on Draft Initial LPV BOP**
4. **F-4b PAC Comments on Draft Initial LPV BOP – Master List**
5. **H-1 Watermaster Update on BOYS Modeling Contract**

LAS POSAS VALLEY BASIN POLICY ADVISORY COMMITTEE

Meeting Minutes for January 22, 2025

The Las Posas Valley Basin Policy Advisory Committee (PAC) held a regular hybrid meeting at 9:00 A.M. on Wednesday, January 22, 2025, at Calleguas Municipal Water District, 2100 Olsen Road, Thousand Oaks, CA, and via Zoom.

A. Call to Order: Chair Ian Prichard called the meeting to order at 9:03 A.M.

B. Roll Call:

The following PAC members were present:

1. Calleguas Municipal Water District – Ian Prichard, Chair
2. West Las Posas Large Agriculture – Rob Grether, Vice Chair
3. Ventura County Waterworks District Nos. 1 and 19 – Jeff Palmer* (via Zoom)
4. Commercial – Arturo Aseo (via Zoom)
5. Watermaster (non-voting) – Farai Kaseke (via Zoom)
6. Zone Mutual Water Company – John Menne
7. East Las Posas Large Agriculture – David Schwabauer (via Zoom)
8. East Las Posas Mutual Water Company – Laurel Servin (via Zoom)
9. West Las Posas Small Agriculture – Richard Cavaletto
10. West Las Posas Mutual Water Company – Steven Murata

The following PAC member was absent:

1. East Las Posas Small Agriculture – Josh Waters

*New member for Ventura County WWD 1 and 19; formal Watermaster approval pending.

C. Agenda Review: Vice Chair Grether requested to have Item F.2 deferred to a future agenda in February; the topic will be moved to the meeting on February 6 or February 20, 2025.

D. Public Comments: There were no public comments.

E. PAC Member Comments:

Chair Prichard provided follow-up answers to the budget questions posed by Laurel Servin at the last meeting. Specifically, current YTD budget to actual information can be found in every FCGMA board meeting packet, and clarification was provided that the Watermaster budget and basin assessments are billed based on the FCGMA fiscal year which runs from July 1 – June 30. The basin assessments are subject to change at any time based on the need for budget amendments and with Watermaster/FCGMA board approval.

Budget planning discussions for the next fiscal year began at the last FCGMA executive committee meeting, and will continue with monthly FCGMA fiscal committee meetings starting on February 18, 2025. PAC members and members of the public are encouraged to join these meetings and to provide input.

Watermaster Farai Kaseke encouraged all participants to ensure that they are part of the Watermaster Listserv and to check the Watermaster website for the most current information on LPV Basin activities.

F. Regular Agenda

1. Approve the Minutes of the January 9, 2025, Regular PAC Meeting: Vice Chair Grether moved to approve the minutes as stated for the January 9, 2025, meeting; John Menne seconded the motion. The motion passed with a vote of 8 Ayes; 0-Nays; 0-Abstentions.

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

This agenda item has been deferred to a future meeting date in February 2025.

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

The PAC discussed the Watermaster's Response Report (dated December 03, 2024) to its Recommendation Report (dated November 08, 2024).

The PAC noted that the documentation for the United Water Conservation District (UWCD) model used in the draft GSP evaluation was not made available to the PAC or TAC for review and, therefore, the PAC could not make informed policy recommendations concerning the modeling data. Also, the limited number of wells available for calibration poses a problem in terms of gathering and analyzing sufficient modeling data. UWCD is currently working on supplemental documentation to cover changes that have been made since the version that was used for the GSP; a contract is pending between FCGMA And UWCD for this supplemental data.

The PAC supports its initial recommendation that the draft Five-Year GSP Evaluation should include comprehensive information from the UWCD model, including (updated) documentation and details on confidence intervals, to address these concerns and to improve transparency.

The PAC highlighted the importance of its recommendation #7, which calls for a clear master plan and leadership for advancing GSP management projects, asking FCGMA to specify how it intends to oversee, manage, and drive these initiatives.

4. Basin Optimization Yield Study (BOYS) Revised Schedule

On December 23, 2024, Watermaster submitted a memo detailing the need to extend the schedule for the Basin Optimization Yield Study Schedule along with a revised Basin Optimization Yield Study Schedule which was prepared by Dudek.

The PAC discussed this request and some members expressed concern that the proposed timeline may be out of compliance with the terms of the Judgment as revised in September 2024. One such example is the period allotted on the schedule for the PAC to review the materials and provide its recommendation report is listed as 60 days, but the Judgment provides 70 days for this action. Watermaster agreed to research the reason and resolve the discrepancy on the BOYS Schedule.

The TAC expressed similar concerns about the abbreviated periods to review modeling scenarios and to provide their recommendation reports. The PAC is willing to consider allocating some of its days on the schedule to the TAC to be used earlier in the modeling review process if that becomes necessary.

Watermaster and the PAC acknowledged that the creation of a workable schedule for all parties is a collaborative effort and requires buy-in from the FCGMA board, counsel, staff, and TAC and PAC members.

A motion was made by PAC Vice Chair Grether to speak on this topic at the FCGMA monthly board meeting this afternoon; Richard Cavaletto seconded the motion.

The motion passed with a vote of 8 Ayes; 0-Nays; 0-Abstentions.

Vice Chair Grether will state that the PAC supports the delay of the study's end date to accommodate an extra ten days (70 days versus 60 days as stated above) which will be used as needed for TAC to perform modeling review, and for TAC and PAC to review drafts and provide Recommendation Reports. There is also a possibility that the schedule will be further revised in the future if an entirely new modeling system is developed and analyzed.

A similar message will form the substance of the PAC's Recommendation Report, a draft of which will be presented to the PAC at its February 6, 2025 meeting.

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

At its January 9, 2025, meeting, the PAC discussed initial reactions to the draft Basin Optimization Plan, which was presented to the PAC on December 12, 2024 for committee consultation. Tony Morgan, PAC Administrator, collected and compiled comments from the PAC members on the draft BOP. These items were consolidated into: 1) a Master List of comments from individual PAC members; and 2) the draft PAC Recommendation Report that provides overarching policy recommendations.

The PAC discussed these items and the need to carefully consider the costs and benefits of each project to ensure efficient spending of basin assessment funds. The desired outcome of these projects is to increase sustainable yield in the Basin without causing any harm to the Basin at a cost that is sustainable. If no action is taken to avoid it, rampdown measures described in the Judgment will begin on October 1, 2025.

There was extensive discussion on the ten projects under consideration and the project ranking methodology that will be used. The PAC states that the lack of well-developed cost information is holding up the ability to evaluate and prioritize projects, but they also recognize that ranking should include ease of implementation, evaluation of efficacy, and project flexibility.

The PAC discussed consideration of importing water through purchase from Calleguas and/or the purchase of allocations from other landowners/mutuals who have a surplus. These actions are simple to implement, would yield immediate benefits, and are simple to stop.

Based on the group's discussion, additional items will be added to the recommendation list. The PAC's comments on the draft Recommendation Report will be incorporated for consideration of final approval at the February 6, 2025 meeting. The PAC's Recommendation Report will be finalized for return to Watermaster by February 13, 2025, in keeping with the terms of the Judgment.

6. Draft GSP Annual Report

The Judgment requires that Watermaster submit the GSP Annual Report to the PAC for committee consultation. The 2024 Annual Report is due to the California Department of Water Resources by April 1, 2024. The draft report is attached for PAC review; PAC members are encouraged to read and review the report for discussion at a future meeting.

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

G. PAC Subcommittee Reports:

1. Operations Subcommittee: No meeting; nothing to report.

2. Executive Subcommittee: John Menne provided an overview of the meeting where there were four key topics discussed:

    a. Recruitment of an Executive Officer who will be solely dedicated to FCGMA and Watermaster functions. The new job description was reviewed and discussed. A third-party recruitment firm will be engaged for the hiring process.

    b. FCGMA's high-level workplan and initial budget planning for FY 2025/26 were reviewed; the workplan includes 30+ tasks. These discussions will continue with monthly FCGMA fiscal committee meetings beginning on February 18, 2025.

    c. Identification of staffing needs for the Watermaster role; it has been determined that 2.7 full-time employees are required to fulfill the Watermaster's duties.

    d. Hallmark Group is continuing its study of independent staffing needs for FCGMA's tasks and workflow; they will provide specific staffing recommendations once their study is complete.

3. Fiscal Subcommittee: No meeting; nothing to report.

4. TAC Subcommittee: Chair Prichard reported that the TAC discussed the draft Basin Optimization Plan, the Basin Optimization Yield Study, and the timing of reviews and due dates. Further, there is an outstanding question about the availability of new/supplemental modeling data from United Water Conservation District (UWCD), which is needed for a proper review of the plan, and possible alternatives from Dudek if that modeling data is not made available to FCGMA and the TAC. FCGMA has a pending contract with United for this updated modeling data, and Watermaster is hopeful that the contract and its terms will be finalized soon.

H. Written Communication: None.

I. Future Agenda Items: Future agenda items will include a status report on the appointment of a TAC member to the ASR Study Group, the Basin Optimization Plan, and PAC's review of the GSP Annual Report.

J. Adjournment: Chair Prichard adjourned the meeting at 11:31 AM, until the next regular hybrid PAC meeting which is scheduled for February 6, 2025, at 3:00 PM.

TO: **Las Posas Valley Watermaster**

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

RE: **Recommendation Report – Basin Optimization Yield Study Schedule**

DATE: **February 6, 2025**

Dear Las Posas Valley Watermaster,

The Las Posas Valley Watermaster Policy Advisory Committee (PAC) provides this Recommendation Report on the **Basin Optimization Yield Study Schedule dated December 23, 2025.**

Recommendation:
See memo below for PAC recommendations to the **Basin Optimization Yield Study (BOYS) Schedule (January 2025).**

Policy Rationale for Recommendation:
See memo below for rationale.

Summary of Facts in Support of Recommendation:
See memo below for complete summary of facts.

Tally of Committee Member Votes:

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

Report of Bases for Majority and Minority Committee Member Positions:

PAC Recommendations Report Regarding the Basin Optimization Yield Study Schedule

On December 23, 2024, the Fox Canyon Groundwater Management Agency (FCGMA), serving in its capacity as the Watermaster for the Las Posas Valley Basin (LPVB), sent a Committee Consultation request to the LPVB Policy Advisory Committee (PAC) regarding the *Basin Optimization Yield Study (BOYS) Schedule* (Schedule) prepared by Dudek, Inc. as the FCGMA's consultant.

The PAC recognizes the challenges associated with organizing and executing this study and appreciates the effort put forth by the FCGMA and their consultant, Dudek to prepare the *Schedule.* We are pleased to have the opportunity to provide comments on the document for consideration by the FCGMA.

Following a review and discussion by the PAC, the PAC authorized Vice Chair Grether to deliver the PAC recommendations in-person at the January 22, 2025 FCGMA Board of Directors meeting. This recommendation report, which memorializes that in-person communication with the FCGMA, was approved by the PAC on _____, 2025.

Recommendation 1: Consider adjusting the BOYS implementation schedule to allow more time for stakeholder input.

This recommendation has three components:

a. The PAC is supportive of the TAC's recommendation that the TAC be allowed at least an additional 10 days to review the groundwater model and scenario results prior to the development of the draft BOYS;
b. The time period allowed for PAC and TAC to review and respond to the draft BOYS be extended from 60 days to 70 days to match the schedule approved in the amended Judgment; and
c. The target completion date of the BOYS be delayed only nominally from December 2025 to January 2026.

TO: **Las Posas Valley Watermaster**

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

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

DATE: **February 6, 2025**

Dear Las Posas Valley Watermaster,

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

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

Policy Rationale for Recommendation:
See memo below for rationale.

Summary of Facts in Support of Recommendation:
See memo below for complete summary of facts.

Tally of Committee Member Votes:

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

Report of Bases for Majority and Minority Committee Member Positions:

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

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

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

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

Recommendation 1: Pursue projects and programs that are low-cost, readily implementable, and operationally flexible.

The PAC approached review of proposed projects and programs through three criteria: cost; time to water supply production; and operational flexibility. Such projects and programs provide for "piloting" through their ability to be started and stopped as their effects are realized and evaluated. Projects that are costly, have long lead times, and result in significant built infrastructure eat up scarce available capital, incur the operational cost of rampdown over the design and construction period, and create institutional inertia. Projects that are only fully optimized with the development of other projects can create perverse incentives, hardening commitment to decisions even after more cost-effective alternatives are identified. Projects with implementation timelines and benefit realization horizons that extend beyond 2040 do not help achieve the goals of the GSP or the Judgment.

Examples of projects/programs that meet the criteria described above are Projects 2, 7, and 8, the two Calleguas in-lieu programs and the Least Cost Acquisition Program. **The PAC recommends these be moved to the Water Supply Project Prioritization category.**

Recommendation 2: Reconsideration of "ready to implement" projects.

The PAC has reviewed the information for the three prioritized projects (Projects 1, 2, and 5) for inclusion in the BOYS and has reservations that those projects "…are sufficiently defined to implement without additional feasibility studies to define project scopes, costs, and benefits" as described in the dBOP. The dBOP acknowledges the PAC's observations that the costs for these

projects have not been adequately researched (e.g., water purchases from City of Simi Valley are not known, costs for purchasing water from CMWD are unrealistically assumed to be constant through 2029) and the magnitude of the benefits may be dependent on the implementation of other projects that will not be prioritized in the BOYS. **The PAC recommends that the classification of Projects 1, 2, and 5 as "…sufficiently defined to implement…" be revisited and that these projects undergo further scope and cost development prior to consideration for implementation.**

Recommendation 3: Provide details on anticipated project costs and potential funding sources.

Cost information was lacking for many projects, which makes it difficult to evaluate the cost/benefit relationship and to perform comparisons between the various projects. The lack of cost information, even at the placeholder level, skews the cost factor used in the project ranking. **The PAC recommends that all various costs, including operation and maintenance and ancillary construction costs (even as a range of costs, if necessary), be included in the dBOP to help stakeholders understand the potential range of project costs.** It is recognized that the anticipated costs included in the dBOP would be placeholders and would be updated as the project scope matures and modeling or feasibility results become available. The dBOP should include a section on potential funding mechanisms/sources for each project. As currently written, stakeholders cannot discern what entity(-ies) would be fiscally responsible for implementation, operations, and maintenance of all the projects/programs described.

Recommendation 4: Provide details on how the BOP would be performed.

The PAC noted that the dBOP, while providing information about the projects proposed for evaluation in Basin Optimization Yield Study, contained very limited information about how the plan would be executed; that is, how the analysis of each project would be performed or the results interpreted within the goals of the plan. The current dBOP language does not promote a solutions-oriented workflow or clearly show how SGMA and Judgment milestones impact the implementation timeline of the plan. **It recommended that the dBOP be revised with a detailed discussion on, for example but not limited to, how the projects would be evaluated (e.g., what modeling scenarios would be run, single projects or suites of projects), what is the relationship between the prioritized projects and the feasibility studies (i.e., are both to be included in the Basin Optimization Yield Study [BOYS] or only the prioritized projects), and how the modeling scenarios or feasibility studies address the goal of achieving and maintaining an Operational Yield of 40,000 AFY without triggering undesirable results.**

Recommendation 5: Data mine existing water level data sets.

The PAC noted that the intentions of projects 9 (*Construction of additional dedicated groundwater monitoring wells*) and 10 (*Installation of transducers in groundwater monitoring wells*) are critical and vital to long term success. High-quality data that is spatially distributed both geographically and in multiple aquifers is key to understanding how the basin responds to management actions.

The PAC understands the need to expand the monitoring network, but wonders, given the abundance of wells in the Las Posas Basin, that there may be other options besides constructing new monitoring wells, such as exploring the extent to which existing wells can be modified for inclusion in the monitoring network. **The PAC recommends that new monitoring wells should be considered to fill important data gap areas that need additional information, but only after an exhaustive review of the existing wells in the basins is performed to determine if those wells are suitable additions to the monitoring network.** It is recognized by the PAC that the use of irrigation or municipal wells that may be screened across multiple aquifers is less desirable than aquifer-specific monitoring wells. However, irrigation and municipal wells are important additions to monitoring programs in many groundwater basins. The PAC is aware of well owners in the LPV who record and maintain water level data for their wells and is willing to assist the Watermaster in identifying those well owners. The PAC recommends that the TAC, in consultation with Watermaster staff and Dudek, identify locations (geographical and hydrogeological) where additional monitoring would be beneficial, provide those locations to the PAC, and allow the PAC to identify existing wells that may be viable candidates for modification and inclusion in the network.

Recommendation 6: Project benefit interdependencies should be clearly analyzed.

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

Attachments:

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

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

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

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

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment
CMWD-10	Ian Prichard, Calleguas	Editorial	planning assumptions	7	2.2.2.1	*"CMWD represented in recent consultation that the limiting factor is the volume of imported water the two purveyors can accept to offset their pumping in the WLPMA."*	There are other limiting factors to the supply: drought and an imported water outage. Calleguas's and Metropolitan's Water Shortage Contingency Plans (in their Urban Water Management Plans) describe the six water shortage stages and their potential impacts on water users. As recently as 2022, when the State Water Project allocation was only 5% for the second year in a row, Metropolitan enacted an Emergency Water Conservation Program that required significant demand curtailment. During such periods, in-lieu water may not be available. Other emergencies that interrupt imported water service would also constrain the availability of in-lieu water.
CMWD-11	Ian Prichard, Calleguas	Editorial/Policy	planning assumptions	7	2.2.2.2	*"This project would reinitiate a Metropolitan Water District of Southern California incentivized program implemented by CMWD that was operational in the WLPMA between 1995 and 2008."*	This references a program that no longer exists and cannot be reinstated.
CMWD-12	Ian Prichard, Calleguas	Editorial	Complexity analysis/comparison	7	All Projects	*"Project Complexity"*	Recommend some standardization of complexity discussion. Three projects don't offer a judgment on complexity; four are described as "moderately complex"; one is considered "low"; and two are described as "not technically complex."
CMWD-13	Ian Prichard, Calleguas	Policy	planning assumptions	7	2.2.2.2	*"During development of the GSP, CMWD indicated that this project lifespan could exceed 50 years."*	The "could" in this sentence begs additional exposition. Recommend modifying this text to reflect that the reliability of getting imported water from CMWD is currently equal to the reliability of the State Water Project and Metropolitan Water District. Based on existing infrastructure, it is likely that "imported" water will continue to mean SWP water from MWD, and it is likely that it will be available for more than 50 years.
CMWD-14	Ian Prichard, Calleguas	Policy	project complexity	7	2.2.2.2	*"the full benefits of this project may require implementation of other projects, like the Moorpark Desalter (Project No. 4)"*	Relying on a groundwater extraction project (Moorpark desalter) to ensure optimum benefit significantly increases the institutional and implementation complexity of this project.
CMWD-15	Ian Prichard, Calleguas	Editorial		7	2.2.2.3	*"This cost includes O&M to maintain CMWD's conveyance infrastructure."*	Whis is only this portion of the rate called out?
CMWD-16	Ian Prichard, Calleguas	Editorial	costs	7	2.2.2.3	*"The project is envisioned to incentivize VCWWD-19 and Zone MWC by funding the difference between the cost of CMWD and the cost of pumping."*	Clarify that the incentive would come from WM via funds raised as part of basin assessment. It will not be provided by CMWD.
CMWD-17	Ian Prichard, Calleguas	Policy	cost assumptions	7	2.2.2.3		The paucity of dollar signs in this paragraph is striking, especially compared with 2.2.1.3, a project that is more conceptual and conditional. Finding out how much it costs VCWWD-19 and Zone to pump is straightforward—and critical to determining whether/how much to buy.
CMWD-18	Ian Prichard, Calleguas	Policy	cost assumptions	7	2.2.2.3	*""The project is envisioned to incentivize VCWWD-19 and Zone MWC by funding the difference between the cost of CMWD and the cost of pumping."*	It needs to be clear that Calleguas's water would be purchased at the full Tier 1 rate and any financial incentive would be provided by the Watermaster using funds from the basin assessment.
CMWD-19	Ian Prichard, Calleguas	Policy	cost assumptions	9	2.2.3.3	*"VCWWD-1 estimates that the capital cost to construct this project is approximately $4,000,000. O&M costs have not been estimated."*	2.2.3.2 states that the GMA recommends modeling to estimate amount of recharge that would stay in the ELPMA. What is the cost estimate for this modeling and can we include it here?
CMWD-20	Ian Prichard, Calleguas	Editorial/Policy	project benefits	10	2.2.4	*"...reduce the dependence on imported water in the LPVB by providing new local potable supplies."*	There needs to be some way to recognize that different constituents may have different goals. There is a tension between this project, or at least this goal for this project, and projects that bring additional imported water supplies into the basin.
CMWD-21	Ian Prichard, Calleguas	Policy	cost assumptions	10	2.2.4	*"Additionally, this project may require construction of additional pipeline to connect the desalter's brine disposal system to CMWD's Salinity Management Pipeline, which discharges brine from various desalters and water treatment plants to the Pacific Ocean."*	The project would definitely require construction of additional pipeline to connect the desalter's brine disposal system to the Salinity Management Pipeline (SMP), which currently terminates near Los Angeles Ave. and La Cumbre Rd. An SMP Discharge Station would also be required, which would contain metering and water quality sampling equipment.
CMWD-22	Ian Prichard, Calleguas	Editorial/Policy	project benefits	10	2.2.4.1	*"...pumping 6,270 AFY for the desalter project would result in an additional 2,200 AFY of recharge to the ELPMA. Based on this, it is estimated that this project would increase the sustainable yield of the ELPMA by 2,200 AFY."*	Please explain how 6,270 AFY of pumping to make room for 2,220 AFY of recharge increases the sustainable yield.
CMWD-23	Ian Prichard, Calleguas	Editorial	project status	10	2.2.4.2	*"VCWWD-1 has not completed a feasibility study for this project."*	2.2.4.1 references "preliminary numerical groundwater flow modeling." 2.2.4 intro states "Preliminary analyses for the proposed desalter have been completed and the project is in the planning phase."

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CMWD-24	Ian Prichard, Calleguas	Policy	planning assumptions	10	2.2.4.2	*"This project is not dependent on other unbuilt projects or projects that are currently under construction."*	As stated above, the SMP does not extend to the Moorpark Desalter location and several miles of additional pipeline would need to be constructed to serve the Moorpark Desalter. The last sentence of this paragraph states "VCWWD-1 may need to develop an agreement with CMWD to dispose of brine produced at the desalter via CMWD's Salinity Management Pipeline." There are other options besides the SMP for disposing of brine (though how they compare to the SMP is unclear), but if VCWWD-1 wants to use the SMP to dispose of its brine, it would definitely require an agreement with Calleguas to do so.
CMWD-25	Ian Prichard, Calleguas	Policy	project benefits	11	2.2.4.4	*"reduce the dependence on imported water in the LPVBLPV by providing new local potable supplies "*	see comment IP-13 re: 2.2.4
CMWD-26	Ian Prichard, Calleguas	Editorial		11	2.2.4.4	*"Depending on the operational conditions and distribution of desalted water, this project ."*	sentence incomplete
CMWD-27	Ian Prichard, Calleguas	Policy	project benefits	12	2.2.5	*"...leaving 2,200 to 3,700 AFY available as surface flow and recharge to the ELPMA."*	Is "surface flow" the same as "recharge"?
CMWD-28	Ian Prichard, Calleguas	Policy	project benefits	12	2.2.5.1	*"...implementation of this project could increase the sustainable yield of the ELPMA by as much as 2,000 AFY."*	The water is flowing today. How does developing an agreement with Simi to ensure it continues to flow *increase* sustainable yield—at all, let alone by 2,000 AFY?
CMWD-29	Ian Prichard, Calleguas	Policy	project benefits	12	2.2.5.2	*" the full benefits of this project may require implementation of other projects, like the Moorpark Desalter (Project No. 4), which lowers groundwater elevations in the Shallow Alluvial Aquifer"*	The water is not "additional" unless and until it has a place to go that it doesn't now.
CMWD-30	Ian Prichard, Calleguas	Policy	cost assumptions	13	2.2.5.3	*"...FCGMA anticipates that this water will cost less than the $500/AF evaluation criterion..."*	What is the basis for this assumption? What cost are we assuming for the budgeting? Recycled water goes for much higher than this in other parts of the state--in fact, just a few miles down the 101. Offers have been made to the City of Simi Valley to tie up this water, and yet it has not been tied up. Calleguas currently has an agreement with the City to buy recycled water for more than $1,100/AF.
CMWD-31	Ian Prichard, Calleguas	Policy	project benefits	13	2.2.5.4	*"... this project would maintain native habitat..."*	What is the definition of "native habitat"? The second sentence of this paragraph states that "perennial flow... did not begin until the 1970s." Also, without Arundo removal, the water will also maintain invasive species.
CMWD-32	Ian Prichard, Calleguas	Editorial		14	2.2.6.2	*"FCGMA anticipates that implementation of Phase I could be completed within a 2-year timeframe following commitment of funds for the feasibility study."*	Whose commitment?
CMWD-33	Ian Prichard, Calleguas	Editorial/Policy	cost assumptions	15	2.2.6.2	*"may be required to construct, operate, and maintain desalter facilities "*	Who would pay for these?
CMWD-34	Ian Prichard, Calleguas	Editorial/Policy	planning assumptions	15	2.2.6.3	*"Additionally, this does not include any costs required to construct, operate, and maintain local desalters to treat the recycled water to levels suitable for irrigation..."*	Whose responsibility is it to maintain what level of service?
CMWD-35	Ian Prichard, Calleguas	Editorial/Policy	planning assumptions	15	2.2.6.3	*"... and to avoid significant and unreasonable degradation of water quality."*	Whose responsibility is this? And of what "water"? This seems like a different goal than irrigation water quality depending on what water we're talking about.
CMWD-36	Ian Prichard, Calleguas	Policy	planning assumptions	15	2.2.7	*feasibility study*	It is unclear why a feasibility study is needed. In lieu deliveries have been made to Ventura County Waterworks District No. 1 in the past and the infrastructure remains in place.
CMWD-37	Ian Prichard, Calleguas	Policy	planning assumptions	16	2.2.7.1	*Water Supply*	Consideration could also be given to directly injecting imported water into Calleguas's Las Posas Aquifer Storage and Recovery Wellfield.
CMWD-38	Ian Prichard, Calleguas	Policy	planning assumptions	16	2.2.7.1	*Water Supply*	The amount of imported water necessary to prevent minimum threshold exceedances in the ELPMA should be provided so the potential yield of this project is clear and definitive.
CMWD-39	Ian Prichard, Calleguas	Editorial		17	2.2.7.4	*Benefits...*	there doesn't appear to be text in this section
CMWD-40	Ian Prichard, Calleguas	Policy	project benefits	17	2.2.7.5	*"... the potential increase to the sustainable yield of the ELPMA."*	How would it increase sustainable yield? It would offset pumping or shift pumping or add to total water use in the basin, but it doesn't increase "yield."
CMWD-41	Ian Prichard, Calleguas	Editorial		18	2.2.8.4	*Benefits...*	there doesn't appear to be text in this section
CMWD-42	Ian Prichard, Calleguas	Editorial	CEQA	19	2.2.9.2	*"CEQA and NEPA are not required to implement this project."*	CEQA does apply, even if only to file an NOE
CMWD-43	Ian Prichard, Calleguas	Editorial	grants	20	2.2.9.3	*"however, Watermaster staff continuously monitor for potential grant funding"*	This should be a blanket statement made at the top of the document or in every Cost and Funding subsection
CMWD-44	Ian Prichard, Calleguas	Policy	collaboration	20	2.2.9.4	*Collaboration Requirements*	Calleguas already operates a monitoring network comprised of nested, clustered, and individual monitoring wells, as well as monitors wells owned by others. Any monitoring efforts should be closely coordinated with Calleguas to prevent unnecessary duplication.
CMWD-45	Ian Prichard, Calleguas	Policy	collaboration	20	2.2.10	*groundwater monitoring*	Like Project 9, this needs to be done in strong coordination with CMWD.

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CMWD-46	Ian Prichard, Calleguas	Editorial	planning assumptions	22	2.3.1	*"Three projects are sufficiently defined to implement without additional feasibility studies to define project scopes, costs, and benefits."*	See notes to Project No. 2, which would require additional analysis to identify current demands, which will impact costs and benefits. Likely won't rise to the level of a feasibility study, but will require some refinement.
RG-01	Rob Grether	Editorial	Watermaster or FCGMA	1	1.1	*As outlined in the Judgment, FCGMA, in consultation with the LPV Policy Advisory Committee (PAC) and Technical Advisory Committee (TAC), is responsible for developing a Basin Optimization Plan for the LPV.*	5.3.1 states "Watermaster shall…develop and maintain a Basin Optimzation Plan." While FCGMA is currently serving as Watermaster, this sentence and others like it should be changed to match the Judgment.
RG-02	Rob Grether	Editorial	Text from 5.3.2.1	1	1.1	*Criteria for determining the priority and feasibility of each Basin Optimization Project;"*	5.3.2.1 specified the criteria that are to be used for determining the prority and feasibility of each project. As written, it suggests the FCGMA will be setting the criteria instead. The criteria specified in the Judgment should be repeated here so a reader doesn't have reference the Judgment to know if projects in the BOP conform: "Citeria for determining the priority and feasibility of each Basin Optimization Project…shall include, but not be limited to, the estimated amount of yield augmentation, cost effectiveness, cost feasibility, technical/engineering feasibility, project implementation timing, benefits relative to the achievement of Sustainable Groundwater Management, and whether the collaboration, cooperation, or participation of the FCGMA, Calleguas, WWDs, United Water Conservation District, or the Water Right Holders is necessary or desirable for implementation of the Basin Optimization Project.
RG-03	Rob Grether	Editorial	Specific text from 5.3.2.2	1	1.1	*A description of Basin Optimization Projects;*	should be modified to include full text from 5.3.2.2: "A description of Basin Optimization Projects that are likely to be practical, reasonable, and cost-effective to implement prior to 2040 to maintain the Operating Yield at 40,000 AFY or as close thereto as achievable."
RG-04	Rob Grether	Editorial	Specific text from 5.3.2.5	1	1.1	*A schedule for the Basin Optimization Projects which are to be evaluated, scoped, designed, financed, or developed; and*	include full text emphasizing need to coordinate timelines with other agencies: "5.3.2.5. A schedule for the Basin Optimization Projects which are to be implemented to be evaluated, scoped, designed, financed, and developed. If the collaboration, cooperation, or participation of the FCGMA, Calleguas, WWDs, United Water Conservation District, or the Water Right Holders is necessary or desirable for any evaluation, scoping, design, financing, and development of any Basin Optimization Project, the schedule shall so consider the time necessary for such collaboration or cooperation; and
RG-05	Rob Grether	General Editorial	Criteria from 5.3.2.1	6 and others	2.2	*Benefits relative to Sustainable Groundwater Management*	This criterion is specified in 5.3.2.1 but missing from projects 1 - 6, 9, 10
RG-06	Rob Grether	Technical	Arundo removal math	4	2.2.1 and 2.2.1.1 and 2.2.1.4	*The Arroyo Simi–Las Posas Arundo Removal Project involves removal of the invasive plant species Arundo donax from approximately 324 acres of land along the Arroyo Simi-Las Posas corridor. Arundo donax (Arundo) would be replaced with native riparian plant species, which are estimated to consume approximately 6 to 25 AFY per acre less water than Arundo (VCWSD 2015). If all of the Arundo within the 324-acre area is removed, this project could result in up to an additional 2,680 AFY of recharge to the ELPMA (VCWSD 2015).*	The math doesn't track. If arundo removal can result in between 6 and 25 AFY per acre less water, that would mean a range of 1,404 to 5,850 AFY, yet in 2.2.2.1 it says project could result in "as much as 2,680 AFY." If additional assumptions are being made that further reduce the potential water savings, they should be identified and the math should be clearly described. And then in 2.2.1.4 it says Arundo uses 1,900 AFY more than native riparian species. Would the plan be to plant native riparian species in place of the Arundo? If so, what is the cost. If not, why mention this?
RG-07	Rob Grether	Technical	Arundo removal math	4	2.2.1	*FCGMA estimates the total cost to implement this project is approximately $390 per AF*	The estimated cost only holds if the yield is 2,680 AF. It should be clearer that it could be much higher per AF if actual infiltration does not hit the target.
RG-08	Rob Grether	General Technical	Permitted cost and time delays	4, 9	2.2.1 & 2.2.3.2		Some projects (e.g., Arundo removal, stormwater diversion, fish ladder construction) can trigger lengthy permit reviews by multiple agencies. The Plan should underscore how that could affect both scheduling and total cost.
RG-09	Rob Grether		Number formatting	6	2.2.1.3	*$9,100,00 and an O&M cost of $250 per acre-foot (AF) of water.*	I think there is a missing 0
RG-10	Rob Grether	General Editorial	CMWD cost clarity	6	2.2.2	*During development of the GSP … 1,762 AFY of CMWD water would be available … The project is envisioned to incentivize VCWWD-19 and Zone MWC by funding the difference between the cost of CMWD and the cost of pumping.*	The estimated cost of pumping should disclosed so that stakeholders are clear what the net cost per AF would likely be if this project were pursued. Stakeholdres may not have an appetite for water at this cost and would opt instead to face rampdown to lower allocations.
RG-11	Rob Grether	Editorial	CMWD importation limitations	7	2.2.2.1	*CMWD represented in recent consultation that the limiting factor is the volume of imported water the two purveyors can accept to offset their pumping in the WLPMA. FCGMA used these projections for analysis of the project for this Plan.*	More information on the limitations should be provided. Can the limitation be mitigated through investment in infrastructure? What would the cost be?

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

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

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

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

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

From:	LPV Watermaster
To:	Ian Prichard
Cc:	johndmenne@gmail.com; LPV Watermaster; schwabauer@aol.com; jwaters@silentspringsllc.com; Rancho Servin; Grether, Robert; Richard Cavaletto; Steven Murata; Palmer, Jeff
Subject:	Watermaster update on BOYS modeling contract
Date:	Monday, January 27, 2025 12:28:15 PM

Dear PAC members,

Watermaster has been informed by United Conservation Water District that they [United] will not provide Watermaster comments/revisions to the scope of work for the Basin Optimization Yield Study modeling contract until after January 31st. No further explanation was given by United. But Watermaster continues to believe that United's modeling services are the best option for timely completion of the Study, and staff continue to work with United to prepare an acceptable contract.

Watermaster will update the PAC as we get more information.

Thank you,

LPV Watermaster