

## **Las Posas Valley Groundwater Basin Technical Advisory Committee Special Meeting**

Tuesday February 11, 2025, 2:00 PM

Via Zoom:

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

Webinar ID: 841 6807 1218

Passcode: 150451

### **NOTICE OF MEETING**

NOTICE IS HEREBY GIVEN that the Las Posas Basin Technical Advisory Committee (TAC) will hold a special meeting via Zoom at **2 PM on Tuesday February 11, 2025**.

### **AGENDA**

- A. Call to Order**
- B. Roll Call**
- C. Agenda Review**
- D. Public Comments**
- E. TAC Member Comments**
- F. Regular Agenda**
  - 1. Approve Minutes from February 4, 2025 TAC Regular Meeting** (attached, agenda page 3)
  - 2. Revised Recommendation Report Review – Draft Initial Basin Optimization Plan**

The TAC reviewed the Draft Initial Basin Optimization Plan submitted by the Watermaster for Committee Consultation and a draft Recommendation Report in previous regular meetings. The TAC Administrator revised the Recommendation Report with changes to specific text modifying the recommendations for the Watermaster and their consultant (Dudek) to consider.

Two versions of the revised Recommendation Report are attached to this agenda. The first (agenda page 7) is the revised version for TAC review and consideration and the second (agenda page 34) includes tracked changes documenting edits compared to the draft Recommendation Report.

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

- 3. Recommendation Report Review – Draft Las Posas Valley Basin Groundwater Sustainability Plan 2025 Annual Report Covering Water Year 2024**

The TAC reviewed the Draft Las Posas Valley Basin Groundwater Sustainability Plan 2025 Annual Report Covering Water Year 2024 two previous regular meetings. The TAC Administrator prepared the attached (agenda page 46) draft Recommendation Report summarizing TAC comments on the draft Water Year 2024 Annual Report including comments and

recommendations for the Watermaster and their consultant (Dudek) to consider in revising and finalizing the Annual Report.

The draft Recommendation Report will be discussed by the TAC and feedback will be provided to the TAC Administrator. The TAC will consider edits to the draft Recommendation Report and voting to authorize the Administrator to finalize and submit it 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
Draft Water Year 2024 Annual Report	1/15/25	2/15/25
Presentation of Basin Optimization Yield Study Model Scenario Results by Dudek	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 February 4, 2025 TAC Regular Meeting**

## Las Posas Valley Groundwater Basin Technical Advisory Committee Regular Meeting

Meeting Minutes  
for  
February 4, 2025

**A. Call to Order**

The meeting was called to order by Chair Chad Taylor at 2:02 pm.

**B. Roll Call**

Voting TAC members present (via Zoom):

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

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

- Kim Loeb – Present
- Bryan Bondy – Present

All three voting members were present, and Chair Taylor reported the Las Posas Valley Technical Advisory Committee (TAC) had a quorum.

**C. Agenda Review**

Chair Taylor reminded attendees that the agenda for the meeting was published and notified by the Watermaster on January 31, 2025 and asked if TAC members or the public had comments on the agenda. No comments were provided.

**D. Public Comments**

Chair Taylor asked for public comments on items not on the agenda; none were received.

**E. TAC Member Comments**

Mr. Taylor offered an opportunity for TAC members to comment on items not on the agenda. No comments were received.

**F. Regular Agenda**

**1. Approve the Minutes of the January 21, 2025 Regular Meeting**

Mr. Taylor noted that minutes from the January 21, 2025 regular meeting were included in the agenda packet and asked for TAC member comments. TAC members provided comments and corrections to specific statements from the meeting. Mr. Taylor made changes to the minutes in response to these comments and corrections and asked if TAC members were comfortable approving the minutes as amended. TAC members agreed that the minutes could be approved and submitted to the Watermaster as amended.

**MOTION:** Vice Chair Morgan moved to approve the amended minutes of the January 21, 2024 TAC Meeting

**SECOND:** Dr. Abrams seconded the motion

**VOTE:** Unanimously approved

## **2. Recommendation Report Review – Draft Initial Basin Optimization Plan**

Chair Taylor advanced to discussion of the draft Recommendation Report summarizing TAC comments on the draft Initial Basin Optimization Plan. He noted that the draft Recommendation Report was compiled in consideration of the tabulated comments provided by TAC members and presented in previous meeting agenda. These comments were also attached to the draft Recommendation Report and will be submitted to the Watermaster in Microsoft Excel format to facilitate tracking responses to individual comments and recommendations. The numbered recommendations in the draft Recommendation Report represent and summarize multiple TAC comments and recommendations from the individual TAC member tabulated comments.

The TAC discussed the draft Recommendation Report and identified specific text edits and significant revisions to individual recommendations. Mr. Taylor made specific text edits in the draft document during the meeting. The significant discussion focused on two areas of the draft Recommendation Report, specifically recommendations 2 and 4.

Recommendation 2 concerned the interdependence of projects in the Basin Optimization Plan (BOP) and requested revision of the ranking of the Moorpark Desalter project (Project 4), which was presented as a project other projects depend on. Mr. Bondy informed the TAC that on reflection he realized the BOP presentation did not include institutional connections between projects. He requested Recommendation 2 in the Recommendation Report be revised to focus on the presentation of the interdependent projects and not include a request to model Project 4.

Recommendation 4 related to water quality effects of projects in the BOP. The recommendation included a statement regarding water quality optimization that TAC members decided to remove from the Recommendation Report.

Mr. Taylor noted that the requested changes were significant and may require further review prior to TAC approval of the Recommendation Report for finalization and submittal to the Watermaster. TAC members agreed to review a revised version of the Recommendation Report in the special TAC meeting scheduled for February 11, 2025. Mr. Taylor committed to working with Mr. Bondy to make the requested revisions and providing a revised Recommendation Report in the agenda packet for the February 11<sup>th</sup> special meeting for consideration of approval.

No public comments were made.

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

Mr. Taylor turned the TAC to continued discussion of the draft Las Posas Valley Basin Groundwater Sustainability Plan (GSP) Annual Report Covering Water Year 2024. This consultation request was submitted to the TAC on January 15, 2025 and initially discussed in the January 21, 2025 regular meeting. In that meeting the TAC created a plan for review and Recommendation Report preparation. Mr. Taylor reminded TAC members that comments in tabular format were due by February 6<sup>th</sup> for preparation of a draft Recommendation Report that would be reviewed in a special TAC meeting February 11<sup>th</sup>.

The TAC discussed the draft Annual Report, focusing on what comments and recommendations would be most helpful to the Watermaster. They noted that comments and recommendations on the draft Annual Report are best held to items relating to Sustainable Groundwater Management Act (SGMA) compliance, clear presentation of recent groundwater conditions, and project and management action progress in the Basin. TAC members also enquired about the comparison of recent conditions to those in 2015 and noted that this is a common approach as the responsibilities for sustainable management of basins in SGMA begins in 2015 and Groundwater Sustainability Agencies are not required to address conditions that occurred prior.

There were no public comments.

#### **4. Update on Committee Consultation Review Schedule**

Mr. Loeb informed the TAC that there were no new items to add to the list of upcoming committee consultation requests. He noted that the Draft Basin Optimization Yield Study item listed with an expected date of April 1, 2025 is a presentation by the Dudek following completion of initial modeling for the Study. He noted the schedule for that presentation and consultation is dependent on reaching agreement with United Water Conservation District to use the Coastal Plain model for the West Las Posas Management Area. There was no news regarding this negotiation. United informed the Watermaster they would not provide any comments or review of the pending agreement until after January 31<sup>st</sup> and as of the morning of February 4<sup>th</sup> there was still no additional information available. Mr. Loeb asked that the TAC plan to receive the presentation on April 1<sup>st</sup> but be aware that this date is tentative.

No public comments.

#### **5. Schedule for Completing Committee Consultations and Related Recommendation Reports**

Mr. Taylor reviewed the plan for completing current the two current consultations.

Mr. Taylor will work with Mr. Bondy to revise Recommendation 2 of the Draft Basin Optimization Plan Recommendation Report and provide a revised version and a tracked changes version in the agenda for the February 11<sup>th</sup> TAC special meeting. That Recommendation Report is due to the Watermaster by February 13<sup>th</sup>.

Comments from TAC members on the Draft Water Year 2024 Annual Report due to the Administrator in Microsoft Excel tabular format by February 6<sup>th</sup>. A draft Recommendation Report will be provided in the agenda for the special meeting February 11<sup>th</sup>.

No public comments received.

#### **G. Items for Future Agenda**

Mr. Taylor reminded attendees that a request to include page numbers and references was made in a public comment in the previous meeting. This was implemented in the agenda and will be continued in the future. He asked for further feedback and/or items for future agenda, and none was received from the TAC or public.

#### **H. Adjourn**

**MOTION:** Chair Taylor moved to adjourn the meeting at 3:23 pm

**SECOND:** Vice Chair Morgan seconded the motion

**VOTE:** Unanimously approved

## **Attachment 2**

**LPV TAC Recommendation Report Draft Initial Las Posas Valley Basin  
Optimization Plan - Revised 02/09/2025**

February 9, 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 21<sup>st</sup> 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 15<sup>th</sup> 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 or are predicted to occur. 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 affect 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/OR PRIORITIZED**

There are multiple projects described in the dBOP as 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. Additionally, the institutional relationship

between projects are not discussed or included in the prioritization approach. For example, the Moorpark Desalter (Project 4) as described appears to be a critical project because the full benefits of three other projects (1, 3, and 5) are described as dependent on lowering groundwater levels in the Shallow Aquifer around the Arroyo Simi-Las Posas. The importance of the Moorpark Desalter extraction wells is described in the presentation of those other projects as the means to accomplish this reduction of groundwater levels, which will provide space in the Shallow Aquifer for additional groundwater recharge. Consequently, readers assume Project 4 should be included in the Basin Optimization Yield Study (BOYS). However, TAC members note that the institutional relationships between Project 4 and projects that would increase percolation along the Arroyo are important and need to be considered. Projects 3 and 4 have a common sponsor in Water Works District 1 and, as currently and historically defined, would be completed together and would only benefit Ventura County Water Works District 1 rate payers<sup>1</sup>. Projects 1 and 5, like Project 3, seek to maintain or increase percolation along the Arroyo, but are sponsored by FCGMA, would presumably be paid through a basin assessment, and should therefore benefit all pumpers in the ELPMA. However, the percolation from these projects would help sustain increased pumping from Project 4, which would only benefit the Water Works District 1 rate payers. For this reason, it seems unlikely that there would be support for a basin assessment to pay for Projects 1 or 5 if the benefits would be partially or completely captured by Water Works District 1 rate payers. For this reason, Projects 1 and 5, as currently framed, appear to be incompatible with Project 4 from an institutional perspective. The dBOP should be revised to clearly identify the differences in the dependencies and incompatibilities of Projects 1, 3, 4, and 5.

## **2.1 Recommendations:**

- Consider revising how the dependencies are described in Projects 1, 3, 4, and 5.
- Include text regarding the institutional relationships between projects and identify institutional incompatibility of projects.
- 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.
- 
- 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 interdependencies between projects are not described adequately in the document. The most significant example of this is in the text is Project 4, the Moorpark Desalter. The text states that the 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). This leaves the reader

<sup>1</sup> The current project description states that a goal of the Project 4 is to reduce Water Works District No. 1's dependence on imported water.

confused as to why modeling of Project 4 is not included when Project 1 appears dependent on it. Revising the descriptions and details of these projects in the dBOP to clarify these dependencies and institutional incompatibilities will reduce confusion.

### **2.3 Summary of Facts in Support of Recommendation:**

- The text leads to confusion regarding dependencies between projects.
- Projects 1 and 5, described as dependent or possibly dependent on the Moorpark Desalter to create more storage space in the shallow aquifer, are sponsored by FCGMA but would increase recharge that would be pumped by the Moorpark Desalter for the exclusive benefit of the Water Works District 1 ratepayers. It seems unlikely that FCGMA would implement Projects 1 and 5 if the benefits are partially or completely captured by Water Works District 1 rate payers instead of all ELPMA pumpers.

## **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 implementing 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 discussion 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.

##### **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 Individual Comments; 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.

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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.

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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.

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BB-19	Bryan Bondy	Technical	Project Prioritization - Project No. 7	22-23	2.3	N/A	Per comment BB-16, this project should be moved from Section 2.3.2 and Table 3 to Section 2.3.1 and Table 2.
BB-20	Bryan Bondy	Consistency with Judgment	Applicability of Data Gap Projects to BOP	2	1.2, third bullet	"Address data gaps identified in the GSP and 2025 Periodic Evaluation of the LPV GSP."	Should projects to address data gaps be included in the BOP? Projects to address data gaps are not projects that "are likely to be practical, reasonable, and cost-effective to implement prior to 2040 to maintain the Operating Yield at 40,000 AFY or as close thereto as achievable" (Judgment §5.3.2.2).
BB-21	Bryan Bondy	Editorial	Clarification	1	1.1, footnote no. 1		Because footnote no. 1 is the 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.

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

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



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TM-1	TMorgan	General Editorial	plan scope	NA	NA	NA	The document reads like a list of projects rather than a plan. Document does not say WHAT is going to be done. What modeling will be done? Have scenarios been developed to model? How will out-of-basin impacts be addressed? Can a project flow chart be included to show the sequencing of steps envisioned for the plan? Which projects will be modeled? If the goal is get Operational Yield to 40,000 AFY, what quantity of water is needed to be developed via new sources, demand reduction, new projects, or ??
TM-2	TMorgan	General Editorial	plan scope	NA	NA	NA	How do the prioritized projects address the GW problems in each basin? Same for the "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 Construction</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&amp;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&amp;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., aquilogic, Inc.  
Date: January 17, 2025

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

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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.

## **Attachment 3**

**LPV TAC Recommendation Report Draft Initial Las Posas Valley Basin  
Optimization Plan - Revised 02/09/2025, w/ Tracked Changes**

# LAS POSAS VALLEY TECHNICAL ADVISORY COMMITTEE

~~January 30~~February 9, 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 21<sup>st</sup> 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 15<sup>th</sup> 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- or are predicted to occur. 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 effectaffect 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/OR PRIORITIZED

There are multiple projects described in the dBOP as 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. Additionally, the institutional relationship between projects are not discussed or included in the prioritization approach. For example, the Moorpark Desalter (Project 4) is as described appears to be a critical project because the full benefits of three other projects (1, 3, and 5) depend are described as dependent on lowering groundwater levels in the Shallow Aquifer around the Arroyo Simi-Las Posas. The importance of the Moorpark Desalter extraction wells will is described in the presentation of those other projects as the means to 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. readers assume Project 4 should be included in the Basin Optimization Yield Study (BOYS). However, TAC members note that the institutional relationships between Project 4 and projects that would increase percolation along the Arroyo are important and need to be considered. Projects 3 and 4 have a common sponsor in Water Works District 1 and, as currently and historically defined, would be completed together and would only benefit Ventura County Water Works District 1 rate payers<sup>1</sup>. Projects 1 and 5, like Project 3, seek to maintain or increase percolation along the Arroyo, but are sponsored by FCGMA, would presumably be paid through a basin assessment, and should therefore benefit all pumpers in the ELPMA. However, the percolation from these projects would help sustain increased pumping from Project 4, which would only benefit the Water Words District 1 rate payers. For this reason, it seems unlikely that there would be support for a basin assessment to pay for Projects 1 or 5 if the benefits would be partially or completely captured by Water Words District 1 rate payers. For this reason, Projects 1 and 5, as currently framed, appear to be incompatible with Project 4 from an institutional perspective. The dBOP should be revised to clearly identify the differences in the dependencies and incompatibilities of Projects 1, 3, 4, and 5.

## 2.1 Recommendations:

- Consider revising how the dependencies are described in Projects 1, 3, 4, and 5.
- Include text regarding the institutional relationships between projects and identify institutional incompatibility of projects.
- 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.

<sup>1</sup> The current project description states that a goal of the Project 4 is to reduce Water Works District No. 1's dependence on imported water.

- 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~~described adequately in the document. The most significant example of this is in the text is Project 4, the Moorpark Desalter. The text states that the 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). This leaves the reader confused as to why modeling of Project 4 is not included when Project 1 appears dependent on it. Revising the descriptions and details of these projects in the dBOP to clarify these dependencies and institutional incompatibilities will reduce confusion.

## 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~~The text leads to confusion regarding dependencies between projects.
- Projects 1 and 5, described as dependent or possibly 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, are sponsored by FCGMA but would increase surface water flows to be recharge that would be pumped by the Moorpark Desalter for the exclusive benefit of the Water Works District 1 ratepayers. It seems unlikely that FCGMA would implement Projects 1 and 5 if the benefits are partially or completely captured by in the shallow aquifer, are viable~~Water Works District 1 rate payers instead of all ELPMA pumpers.

## 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 ~~implanting~~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~~implementing 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~~discussion 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 ELPMA 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 4**

**Draft LPV TAC Consultation Recommendation Report, Draft Las Posas Valley Basin Groundwater Sustainability Plan 2025 Annual Report Covering Water Year 2024, February 10, 2025**

February 10, 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 Las Posas Valley Basin Groundwater Sustainability Plan 2025 Annual Report Covering Water Year 2024

The Las Posas Valley Watermaster Technical Advisory Committee (TAC) provides this Recommendation Report regarding the Draft Las Posas Valley Basin Groundwater Sustainability Plan 2025 Annual Report Covering Water Year 2024 in response to the Las Posas Valley Basin Watermaster (Watermaster) committee consultation request. Annual reporting of groundwater conditions and progress toward sustainability are required by the Sustainable Groundwater Management Act (SGMA) and Santa Barbara Superior Court judgment in Las Posas Valley Water Rights Coalition, et al., v. Fox Canyon Groundwater Management Agency (Judgment).

The request for consultation on the Draft Las Posas Valley (LPV) Basin Groundwater Sustainability Plan (GSP) 2025 Annual Report Covering Water Year 2024 (WY 2024 Annual Report) was submitted to the TAC January 15, 2025. The TAC discussed the WY Annual Report in regular TAC meetings on January 21, 2025 and February 4, 2025. TAC comments on the WY 2024 Annual Report were provided to the TAC Administrator by each TAC member in tabular formats and are attached to this Recommendation Report. These specific comments have been incorporated into the recommendations presented below and will be provided to the Watermaster in the original Microsoft Excel format to aid in tracking comment and recommendation responses.

The TAC will review this Recommendation Report and discuss and consider voting to approve it in a special meeting on February 11, 2025.

## TAC RECOMMENDATIONS

### 1. RECOMMENDATION 1: CLARIFY THE RELATIONSHIP BETWEEN WATER LEVELS IN SPECIFIC AREAS OF THE BASIN AND SUSTAINABLE YIELD

Sustainable yield is a basin-wide, long-term metric for assessing overall groundwater basin conditions. There are two locations in the text where ongoing water level declines in the

eastern part of the West Las Posas Management Area (WLPMPA) and northern East Las Posas Management Area (ELPMA) are attributed to basin-wide production in excess of sustainable yield. It is overly simplistic to say that these localized declines are the result of basin-wide exceedance of sustainable yield. There must be a local reason that water levels in these specific areas are declining when they are relatively stable in other parts of the Las Posas Valley Basin (Basin).

### **1.1 Recommendations:**

- Consider revising these specific statements regarding local water level declines and sustainable yield at the end of the Executive Summary and in section 3.1.1.
- Edits should at a minimum indicate that local pumping in excess of recharge is the likely cause of water level declines.
- Consider also indicating that additional information and analysis may be necessary to define the affected areas and identify projects and management actions to address the ongoing declines. Additional information could include more consistent groundwater elevation monitoring at increased geographic density and analyses could include local pumping and water level change rates.

### **1.2 Technical Rationale for Recommendation:**

Stating that Basin-wide pumping in excess of sustainable yield is responsible for local groundwater elevation declines simultaneously implies that all pumping in the Basin affects groundwater elevations in these specific locations and minimizes the effect of local conditions on those declining elevations. Conceptually, these two areas are somewhat hydraulically isolated and pumping in them has historically exceeded local recharge and flow from other portions of the Basin (local subsurface inflow). Because local pumping exceeds the supply of water to these areas of the Basin, water levels have been and continue to decline. This has occurred during a period when pumping Basin-wide commonly exceeds the total sustainable yield of the Basin. However, it is possible that pumping Basin-wide could be reduced to below the sustainable yield while local pumping in the eastern WLPMA and northern ELPMA continues to exceed combined local recharge and subsurface inflow. In this case, water levels in these two areas would continue to decline even though Basin-wide pumping was below total sustainable yield.

The TAC hopes that contextualizing the hydrogeologic and hydrologic conditions related to the groundwater elevation declines in the eastern WLPMA and northern ELPMA will help the Watermaster and stakeholders continue to advance projects and management actions targeted at and designed to maximize benefit to these areas.

### **1.3 Summary of Facts in Support of Recommendation:**

- Water levels have continued to decline in the eastern WLPMA and northern ELPMA.
- Pumping in the Basin has commonly exceeded the Basin-wide sustainable yield.
- Recharge and subsurface inflow to the eastern WLPMA and northern ELPMA are limited by hydrogeologic structures in the Basin.
- Reducing total pumping in the Basin may not sufficiently address the local water budget imbalance in the eastern WLPMA and northern ELPMA.



## **2. RECOMMENDATION 2: ADD DISCUSSION AND COMPARISON OF THE REGRESSION CHANGE IN STORAGE ESTIMATION METHOD AND THE MODEL-BASED METHOD**

The TAC is interested in seeing a comparison of the results of the change in storage methods referenced in the Annual Report. In the discussion of change in storage, the Annual Report indicates that previously presented change in storage estimates for the period from 2015 through 2022 were updated following extensions of the models for both the WLPMA and ELPMA completed as part of the 2025 Periodic Evaluation of the LPV GSP. However, the Annual Report does not present the difference these change in storage volume updates represent compared to those reported previously. An accounting of the difference between the changes in storage presented in previous annual reports and those in the WY Annual Report should be included along with a discussion of the differences between the model-based and regression-based methods for estimating change in storage.

### **2.1 Recommendations:**

- Include comparison of model-based change in storage estimates presented in the WY 2024 Annual Report to those for the same years in previous annual reports derived from the regression-based method.
- Discuss the differences in change in storage estimates between these two methods.
- Consider completing a thorough assessment of the differences in outcome of these two methods for estimating changes in storage and presenting it in future annual reports
- Consider developing a plan for how future model updates and resulting differences in change in storage estimates presented in annual reports and other publications will be retroactively adjusted. This plan should be included in future annual reports (and the WY 2024 Annual Report, if possible) and summarized or referenced in other documents that include change in storage estimates.
- Standardize the years for which changes in storage are reported for all management areas. Table 2-7a shows change in storage for 2019 through 2024 for the Lower Aquifer System of the WLPMA while Table 2-7b shows 2016 through 2024 changes in storage for all ELPMA and Epworth Gravels Management Area aquifers.

### **2.2 Technical Rationale for Recommendation:**

Differences in historical change in storage estimates between annual reports and/or other published documents may lead to confusion on the part of stakeholders and regulators. While the WY 2024 Annual Report acknowledges that recent historical change in storage estimates presented in past annual reports were updated in the WY 2024 Annual Report, the differences in these values are not presented. Assuming the difference between the previously reported and current change in storage values is relatively small and does not include sign changes, inclusion of transparent presentation of the differences should reduce confusion.

TAC members noted that the changes in storage presented in the WY 2024 Annual Report do show the linear regression method for estimating storage change is potentially

underestimating storage change. Table 2-7b shows Fox Canyon Aquifer model-based changes in storage in the ELPMA for above normal years 2019 and 2020 of 5,962 and -393 acre-feet per year (AFY), respectively. The regression-based changes in storage for wet years 2023 and 2024 in Table 2-7b are reported at 6,030 and 5,271 AFY for the wet years of 2023 and 2024, respectively. These changes in storage for wet years are only slightly greater than the modeled maximum in recent above normal years, implying that the linear regression method is underestimating storage change.

**2.3 Summary of Facts in Support of Recommendation:**

- The WY 2024 Annual Report indicates that the recent model extensions resulted in ‘updates’ in change in storage estimates presented in previous annual reports.
- There is no presentation of the magnitude or sign differences these changes represent.
- The TAC is not aware of a published assessment of the differences in change in storage estimates between the model-based and regression-based methods for estimating storage change.

**3. RECOMMENDATION 3: PROVIDE AN UPDATE ON WATER YEAR 2024 GROUNDWATER PRODUCTION MISSING FROM THE DRAFT ANNUAL REPORT**

The draft WY 2024 Annual Report was submitted to the TAC for review without groundwater production records for the water year. Not having these data makes assessing groundwater sustainability conditions in the Basin challenging. We understand there were difficulties compiling groundwater use records in the first year of implementation of a new data collection system. However, comparison of groundwater use over time in to monitored water level conditions and estimated changes in storage is an important function of GSP annual reporting. The TAC anticipated the Watermaster would provide these missing data during the WY 2024 Annual Report review period, but they have not been made available to date.

**3.1 Recommendations:**

- Provide groundwater use data to the TAC for review as soon as possible.
- Review and revise groundwater use reporting and data processing procedures so that these important data are available for inclusion in future draft annual reports prior to committee review.

**3.2 Technical Rationale for Recommendation:**

Groundwater production information for the Basin and each management area is an important component of assessing sustainability. The ability of the TAC to provide thorough technical review of documents relies on those documents being complete when submitted.

**3.3 Summary of Facts in Support of Recommendation:**

- The WY 2024 groundwater production data for the Basin were not available for inclusion in the draft WY 2024 Annual Report and have not been provided to the TAC separately as of the date of publication of this report.

- SGMA and the Judgement require groundwater use data to be collected and presented in annual reports.

#### **4. RECOMMENDATION 4: CONTINUE WORKING TO CONSISTENTLY COLLECT WATER LEVEL AND OTHER DATA FROM THE BASIN MONITORING NETWORK**

The TAC noted that there are monitoring wells designated as Key Wells in the GSP for which sustainable management criteria (SMCs) have been established that are inconsistently monitored. The TAC acknowledges that these problems were identified and commented on in the TAC review of the first GSP periodic evaluation for the Basin and that the period reflected in the WY 2024 Annual Report is the same as that discussed in the periodic evaluation. However, the TAC also notes that previous annual reports have included statements recognizing these deficiencies and the Watermaster's efforts to address them when first discussing the missing data. The WY 2024 Annual Report does not present a similar statement or commitment to addressing the problem until discussion of the periodic evaluation in section 3.

##### **4.1 Recommendations:**

Continue to include statements regarding Watermaster efforts to address groundwater monitoring consistency problems when presenting monitoring results.

##### **4.2 Technical Rationale for Recommendation:**

Inconsistent groundwater monitoring in basins attempting to achieve groundwater sustainability makes assessing sustainability efforts challenging and can lead to uncertainty. Readers of the WY 2024 Annual Report may focus on specific areas of the report and could miss statements regarding plans to address problems in data collection if they are not included in the same section of the report where the data are discussed.

##### **4.3 Summary of Facts in Support of Recommendation:**

- Section 2 of the WY 2024 Annual Report indicates that some important data were not collected during the period assessed in the report.
- Discussion of efforts to address data collection inconsistencies were not included in section 2 as in previous annual reports.

#### **5. RECOMMENDATION 5: CONSIDER ADDING TO THE DISCUSSION AND EXPLANATION OF GROUNDWATER ELEVATION CONTOUR MAPS TO INCLUDE RATIONALE FOR CONTOURING DECISIONS**

When reviewing the groundwater elevation contour maps and related discussion in the WY 2024 Annual Report, TAC members had questions regarding specific decisions to include and/or omit contour data for multiple aquifers and areas of the Basin. These questions included:

- Why were the values identified as not used in contouring omitted?

- How were the Shallow Alluvial aquifer contours upstream of 07G01 defined in both shallow alluvial aquifer maps (Figures 2-1 and 2-2) and also the contours downstream of 09Q08 in Figure 2-1? There do not appear to be wells with measured water levels up and downstream of these wells for generating contours.
- Why were contours not generated for the Epworth Gravels aquifer?
- Why was only a portion of the ELPMA contoured for the Upper San Pedro aquifer in fall 2023 when there were data for the WLPMA for that period and why were no contours created for this aquifer for spring 2024?
- Why is so little of the Fox Canyon aquifer contoured in Figures 2-7 and 2-8? Are all the omitted data really from the aquifer? Is there another way to better show the spatial distribution of groundwater elevations in this aquifer?
- How were the contours in the neighboring basins shown for the Fox Canyon Aquifer on Figures 2-7 and 2-8 developed? What is the assumed relationship between the Oxnard basin and the WLPMA and the Pleasant Valley basin and ELPMA, and how was this relationship used in the preparation of these contours?

#### **5.1 Recommendations:**

- Consider including additional discussion regarding groundwater elevation contouring decisions in the text to help readers understand the information presented on the maps in Figures 2-1 through 2-10.
- Consider removing groundwater elevation contours for the neighboring Oxnard and Pleasant Valley basins or explain in the text the hydraulic relationship the contours illustrate.

#### **5.2 Technical Rationale for Recommendation:**

Technical rationale for these recommendations is included in the questions above and TAC member comments BB-8, BB-9, TM-13, TM-14, CT-19, CT-20, CT-21, CT-22, CT-23, and CT-24 in the attached individual tabulated TAC comment matrix.

#### **5.3 Summary of Facts in Support of Recommendation:**

The facts related to these recommendations are included in the attached individual tabulated TAC comments.

### **6. RECOMMENDATION 6: CHECK WATER LEVEL DATA FOR ACCURACY**

In reviewing the WY 2024 Annual Report, TAC members had questions regarding the accuracy of multiple water level data records. These questions should be reviewed alongside the related water level data records and referenced values in the text and corrected or discussed.

#### **6.1 Recommendations:**

Review the anomalous, questionable, and/or incorrect values identified in TAC member comments BB-10, BB-12, BB-13, BB-19, TM-17, TM-18, and TM-19 in the attached tabulated comment matrix.

**6.2 Technical Rationale for Recommendation:**

The technical rationale for the recommendation above are included above and in the attached individual tabulated TAC comments.

**6.3 Summary of Facts in Support of Recommendation:**

Facts related to this recommendation are included above and in the attached individual tabulated TAC comments.

## **7. RECOMMENDATION 7: CONSIDER REVISING GROUNDWATER ELEVATION CONTOURS TO INCLUDE SPECIFIC DATA AND BETTER EXPLAIN CONTOURING DECISIONS**

In reviewing the WY 2024 Annual Report, TAC members had questions regarding the omission and inclusion of specific data for generating groundwater elevation contours of some aquifers and portions of the Basin. Individual TAC member comments in the attached tabulated comment matrix identified specific water level measurements that could have been included in contouring.

**7.1 Recommendations:**

Consider revising contours based on information provided in TAC member comments BB-11, BB-14, BB-15, BB-16, and BB-18 in the attached tabulated comment matrix.

**7.2 Technical Rationale for Recommendation:**

TAC members identified data that could have been used in contouring; rationale for this recommendation is included in the referenced TAC member comments.

**7.3 Summary of Facts in Support of Recommendation:**

The facts related to these recommendations are included above and in the attached individual tabulated TAC comments.

## **8. RECOMMENDATION 8: CONSIDER ADDING CLARIFYING TEXT AND ADDRESSING TYPOGRAPHICAL ERRORS IN SPECIFIC SECTIONS OF THE ANNUAL REPORT**

TAC members identified multiple portions of the draft Water Year 2024 Annual Report that would benefit from the addition of clarification and/or correction of apparent typographical errors. The clarifications can be generally categorized into the following groups:

- New information
- Comparison of current conditions to 2015
- Presentation of streamflow data
- General text clarification
- Headings not matching text
- Map or graph title, labels, or legend edits

Recommendations relative to each category are summarized below and presented in the tabulated TAC comments attached to this Recommendation Report.

### 8.1 Recommendations:

- Consider adding text related to the following new or additional information:
  - On page 2-4 in section 2.1.1.4 well 03N19W31D07S is identified as having shown groundwater elevation increases between fall 2022 and fall 2023. The reason for this change and difference to other local conditions may reflect the fact that Calleguas Municipal Water District (CMWD) was pumping their aquifer storage recovery (ASR) wellfield during fall 2022 and then switched to injection from February through September 2023.
  - The list of significant new information in section 3.1.2 (page 3-1) should be expanded to note the inclusion of data from the CMWD three multi-level groundwater monitoring wells, which provided new stratigraphic data for the hydrostratigraphic model, characterization of vertical gradients, and expansion of the groundwater level monitoring network.
- Consider adding explanation for why current and recent conditions are compared to conditions in 2015. Readers unfamiliar with SGMA may not know the significance of 2015 in the context of sustainable groundwater management policy and may be confused.
- Consider adding additional discussion of streamflow conditions, specifically:
  - The text in section 1.2.2 and Table 1-1 discuss and show average daily streamflow values, which are biased by peak storm flows. Median values may be more informative. Consider showing and/or discussing median daily streamflow values in addition to the average values.
  - Consider adding text in section 1.2.2 clarifying the factors that affect streamflow volumes in Arroyo Las Posas. The text states that annual streamflow reflects precipitation, but flow in 2010 and 2011 was greater than flow in 2023 and 2024, while precipitation was greater in 2023 and 2024. This implies that other factors are also affecting streamflow.
- Consider editing and/or adding text to increase the clarity of the text as suggested in TAC member comments BB-3, BB-4, BA-6, TM-6, TM-21, TM-22, CT-3, CT-7, and CT-13 in the attached individual tabulated TAC comments.
- Consider revising the heading titles for sections 2.1.1 and 2.2.2.
  - The former is titled *Groundwater Elevation Contour Maps* but the text in the section discusses elevation changes by aquifer and specific well and does not exclusively include information relating to contour maps.
  - The latter is titled *Groundwater Elevation Hydrographs* but deals more with comparison to sustainable management criteria than to discussions limited to hydrographs.
- Consider addressing the map and graph title, label, and/or legend changes and comments in TAC member comments BB-7, BB-22, BB-24, BA-9, BA-10, BA-11, BA-12, TM-15, TM-16, TM-20, and CT-25.

- Consider addressing the apparent typographical errors identified in TAC member comments BB-21, BB-23, BA-5, BA-13, TM-4, TM-5, CT-1, CT-12, CT-14, CT-17, and CT-18.
- Consider assessing the organization of future Annual Reports and modifying to be consistent with the October 2023 *Groundwater Sustainability Plan Implementation: A Guide to Annual Reports, Periodic Evaluations, & Plan Amendments* guidance document from the California Department of Water Resources (DWR).

**8.2 Technical Rationale for Recommendation:**

The technical rationales for each of these recommendations are included above and in the attached individual tabulated TAC comments.

**8.3 Summary of Facts in Support of Recommendation:**

The facts related to these recommendations are included above and in the attached individual tabulated TAC comments.

**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 Las Posas Valley Basin  
Groundwater Sustainability Plan 2025 Annual Report Covering Water  
Year 2024**



**Specific Comments from the Las Posas Valley Basin Technical Advisory Committee  
Water Year 2024 Draft Annual Report**

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment
BB-1	Bryan Bondy	Technical		i	ES	The average precipitation in the LPV between 2016 and 2024 was 16.4 inches per year.	What is the significance of the 2016-2024 period?
BB-2	Bryan Bondy	Technical		Global	Global	N/A	Throughout the document values of groundwater levels, etc are compared to 2015 values. It is unclear what the relevance of comparing to 2015 values is because minimum thresholds are not pegged to 2015 conditions. Such comparisons may be unnecessary and potentially misleading absent context for why they are provided.
BB-3	Bryan Bondy	Technical		1-2	1.1.2	The LAS of the LPV Basin is hydrogeologically connected to the LAS of the Oxnard Subbasin.	For clarity, consider revising to say: "The LAS of the LPV-WLPMA Basin is hydrogeologically connected to the LAS of the Oxnard Subbasin."
BB-4	Bryan Bondy	Editorial		1-4	1.2.2	There is one active streamflow gauging station in the LPV Basin.	Statement and Figure 1-2 are in conflict. Figure 1-2 shows six "Recording Stream Gauges" in the LPVB.
BB-5	Bryan Bondy	Technical		1-4 - 1-5	1.2.2; Table 1-1	N/A	Text and Table 1-1 discuss / show data from WY 2010 - 2024. It is noted that the gauge has data prior to WY 2010. Why not showing earlier data? If cutting off older data, why WY 2010 vs. other sections that discuss data since SGMA (2015)? Seems arbitrary.
BB-6	Bryan Bondy	Technical		1-4 - 1-5	1.2.2; Table 1-1	N/A	Text and Table 1-1 discuss / show average daily values, which are biased by peak storm flows. Median values may be more informative. Consider showing/discussing medians in addition to the averages.
BB-7	Bryan Bondy	Editorial		N/A	Figures 2-1 - 2-10	Note 1 says "Well labels consist of an italicized abbreviated State Well Number (SWN)"	Labels on maps are not italicized.
BB-8	Bryan Bondy	Technical		N/A	Figures 2-1 - 2-10	N/A	An explanation should be provided for why values not used in contouring were omitted.
BB-9	Bryan Bondy	Editorial		N/A	Figures 2-3 & 2-4	N/A	Consider noting why there are no contours shown.
BB-10	Bryan Bondy	Technical		N/A	Section 2.1.1.3; Figures 2-5 & 2-6	N/A	There are a number of anomalous values in WLPMA. These wells should be looked at closer to reassess aquifer designation or to determine if they are suitable for monitoring.
BB-11	Bryan Bondy	Technical		N/A	Figures 2-7 & 2-8	N/A	Values for 07K02 and 08H02 should be used for contouring in ELPMA to show a more complete picture of the groundwater flow direction away from Arroyo Las Posas to the north. Similar comment in WLPMA for wells 08L03, 08G04, and 17F05.
BB-12	Bryan Bondy	Technical		N/A	Figure 2-8	N/A	Value for 27H03 is anomalous. GWL data for this well began deviating significantly from the long term trend in 2021. Please see graph provide with comment. 
BB-13	Bryan Bondy	Editorial		2-2	2.1.1.3	In spring 2023, groundwater elevations in the Upper San Pedro Formation in the WLPMA ranged from a low of -49 ft. msl at well 02N21W15M03S to...	-49.7 rounded is -50.
BB-14	Bryan Bondy	Technical		2-3	2.1.1.4	Fall 2023 groundwater elevations in the FCA in the WLPMA ranged from a low of approximately -236 ft. msl at well 02N20W06R01S (Figure 2-7), which is located in the eastern portion of the WLPMA, to a high of -33 ft. msl at well 02N20W12H01S, which is located in the central portion of the WLPMA (Figure 2-7).	The highest value is 08L03 at 4 feet above sea level. Please also see earlier comment about omitting this value in contouring.
BB-15	Bryan Bondy	Technical		2-3	2.1.1.4	Spring 2024 groundwater elevations in the WLPMA ranged from a low of approximately -167 ft. msl at well 02N21W13A01S to a high of approximately -25 ft. msl at well 02N20W12H01S (Figure 2-8).	The highest value is 08G04 at 22 feet above sea level. Please also see earlier comment about omitting this value in contouring.

**Specific Comments from the Las Posas Valley Basin Technical Advisory Committee  
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Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment
BB-16	Bryan Bondy	Technical		2-3	2.1.1.4	<i>In the ELPMA, fall 2023 groundwater elevations ranged from a high of approximately 297 ft. msl at well 02N20W11B02S, which is located near Arroyo Simi-Las Posas, to a low of approximately 113 ft. msl at well 02N20W03J01S, which is in the central portion of the ELPMA (Figure 2-7).</i>	The highest value is 08H02 at 467 feet above sea level. Please also see earlier comment about omitting this value in contouring.
BB-17	Bryan Bondy	Technical		2-4	2.1.1.4	The one exception to this is well 03N19W31D07S, where the fall 2023 groundwater elevation was approximately 44 feet higher than fall 2022.	Consider noting that the reason for this change and why it is different from other areas is because Calleguas MWD was pumping the ASR well field during Fall 2022 and then injected a considerable volume of water between in February through September 2023.
BB-18	Bryan Bondy	Technical		2-4	2.1.1.4	Spring 2024 groundwater elevations in the ELPMA ranged from a high of approximately 303 ft. msl at well 02N20W11B02S, which is located near Arroyo Simi-Las Posas, to a low of approximately 115 ft. msl at well 03N20W27H03S, which is in the northern ELPMA (Figure 2-8).	The highest value is 08H02 at 470 feet above sea level. Please also see earlier comment about omitting this value in contouring. Reported low value at 27H03 is an anomalous value- please see earlier comment about this data from this well.
BB-19	Bryan Bondy	Technical		2-7	2.1.2.1	<i>Spring 2024 groundwater elevations were above the measurable objective groundwater elevations at two (02N20W08F01S and 02N21W12H01S) of the three of the key wells measured in the WLPMA (Table 2-1; Figure 2-11).</i>	Per Table 2-1, 02N20W08F01S was below its MO.
BB-20	Bryan Bondy	Editorial		2-14	2.5	<i>Total available water is reported in Table 2-5 by water year.</i>	This sentence should reference Table 2-6, not 2-5.
BB-21	Bryan Bondy	Editorial		N/A	Figures 2-11 through 2-13	N/A	Solid blue circle is not explained in legends of these figures. Open blue circle is explained in legend of Figure 2-11, but not the others. Use of an open circle to indicate no measurement is misleading because it looks like a data point that does not really exist. Consider removing and just making a note about no measurement.
BB-22	Bryan Bondy	Editorial		N/A	Figures 2-11 through 2-13	<i>Note: 2025 Interim milestone groundwater elevations are not established for wells where 2015 groundwater elevations were higher than the established minimum thresholds</i>	This should read" "Note: 2025 Interim milestone groundwater elevations are not established for wells where 2015 groundwater elevations were higher than the established <b>minimum thresholds-measurable objectives.</b> "
BB-23	Bryan Bondy	Editorial		N/A	Figures 2-12b	N/A	There is a strange font on labels of some graphs.
BB-24	Bryan Bondy	Technical		3-1	3.1.2	N/A	The list of significant new information should be expanded to note the inclusion of data from Calleguas' three multi-level groundwater monitoring wells, which provided new stratigraphic data for the hydrostratigraphic model. characterization of vertical gradients, and expansion of the groundwater level monitoring network.
BA-1	Bob Abrams	General Technical	Sustainable yield	ii	Final sentence	<i>"These ongoing groundwater elevation declines in eastern WLPMA and northern ELPMA indicate that groundwater production from the LPV Basin exceeds the sustainable yield."</i>	This is an over-simplification. Sustainable yield is exceeded these two areas, but other parts of the Basin are doing better. Add <i>"in these areas "</i> to the end of this sentence? It would also be worth noting what management actions are being implemented to mitigate the over-production in these areas because that is the obvious next question for the local Groundwater Management Agency. Even if the management action is not finalized yet.
BA-2	Bob Abrams	General Technical	San Pedro GW elevations WLPMA	2-2	2.1.1.3	<i>"in western WLPMA and 3 to 15 feet in central WLPMA".</i>	A discussion of groundwater elevations in the San Pedro Formation in eastern WLPMA conspicuous by its absence. If this is because there are no SP Formation wells in eastern WLPMA, then say this is a data gap.
BA-3	Bob Abrams	Technical	GW Elevations in GCA	2-4	2.1.1.5	<i>"none were measured in fall 2023"; "Well 02N21W22G01S was not measured in spring 2023"; "Spring 2024 groundwater elevations were not measured in either of the two wells"</i>	Need to explain why there are no measurements in these key wells in key aquifers. The previous 2023 WY's report pp. 2-15 noted that "The FCGMA, as part of their GSP implementation activities, continues to evaluate opportunities to install dedicated monitoring wells and improve access/coordination with local operators to reduce these uncertainties and data gaps." Unless there are good reasons, it looks like this management action hasn't happened.
BA-4	Bob Abrams	Technical	Pumping Data	2-9	Table 2.2 and 2.3 and Table 2.6	<i>Footnotes in WY2023 data</i>	Disappointing that groundwater production has not been updated since March 2024 report was issued.
BA-5	Bob Abrams	Editorial	typo	2-14	2.5	<i>"Total available water is reported in Table 2-5 by water year"</i>	Table 2-6?
BA-6	Bob Abrams	Editorial	Acronym	2-14	2.5	<i>"AMI-estimated extractions"</i>	Spell out AMI
BA-7	Bob Abrams	Technical	Pumping Data	2-14	Table 2.6	<i>Footnotes in WY2023 data</i>	Disappointing that groundwater production has not been updated since March 2024 report was issued.
BA-8	Bob Abrams	Technical	Pumping Data	3-3	3.2	<i>"Collected groundwater use and extraction data to inform basin management."</i>	Incomplete Tables 2.2, 2.3 and 2.6 would suggest otherwise
BA-9	Bob Abrams	Technical	Groundwater contours		Figure 2-3 and Figure 2-4	<i>"Groundwater Elevation Contours in the Epworth Gravels Aquifer"</i>	Better title would be "Groundwater Elevations in the Epworth Gravels Aquifer" because there are no contours
BA-10	Bob Abrams	Technical	Groundwater contours		Figure 2-5	<i>"Groundwater Elevation Contours in the Upper San Pedro Aquifer.."</i>	Better title would be "Groundwater Elevations and Contours in the Epworth Gravels Aquifer"

**Specific Comments from the Las Posas Valley Basin Technical Advisory Committee  
Water Year 2024 Draft Annual Report**

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment
BA-11	Bob Abrams	Technical	Groundwater contours		Figure 2-6	"Groundwater Elevation Contours in the Upper San Pedro Aquifer.."	Better title would be "Groundwater Elevations in the Epworth Gravels Aquifer" because there are no contours
BA-12	Bob Abrams	Technical	Groundwater contours		Figures 2-9 and 2-10	"Groundwater Elevation Contours in the Upper San Pedro Aquifer.."	Better title would be "Groundwater Elevations in the Grimes Canyon Aquifer" because there are no contours
BA-13	Bob Abrams	Technical	Text box		Figure 2-12b	"c o e 2.2 Ele at o 281.6 ft MSL" "M r h 2.2 Ele a ion 260.2 ft MSL"	Problem with pdf conversion? Well 02N20W10J01S and Well 02N20W10G01S
TM-1	TMorgan	General Technical		2-7	2.1.2.2	Fall 2023 groundwater elevations were measured in three of the five key wells in the WLPMA.	With so few key wells in WLPMA, the loss of data from 40% of those wells (2/5 wells) is problematic. Recommend FCGMA and cooperating entities have a MOA that prescribes when the wells are to be monitored, who is responsible for measuring W/Ls, etc. It would be helpful to the reader to have a short explanation of why the well soundings were not performed (e.g., no access to well due to field conditions, loss of land access, etc.). Was this a one-off situation or a permanent change in data availability going forward?
TM-2	TMorgan	General Editorial	inaccurate section title	2-7	2.1.2	Groundwater Elevation Hydrographs	This section is titled "Groundwater Elevation Hydrographs", however the only reference to the hydrographs is to Figure 2-11. Suggest renaming this section "Groundwater Elevation" to more accurately reflect the text.
TM-3	TMorgan	General Technical	clarify text	2-8	2.2	These tables, and the narrative to this section, will be updated upon receipt of 2024 extraction data.	Does this mean that the 2025 Annual Report will be revised and re-issued OR will the 2024 extraction data be included in updated Tables 2-2 and 2-3 in the 2026 Annual Report. Suggest providing language to clarify to the reader how and when the missing data will be added to this report.
TM-4	TMorgan	General Editorial	typo	2-11	2.4	CWMD = Calleguas Municipal Water District	Abbreviation is incorrect in Table 2-4 Notes - should be CMWD
TM-5	TMorgan	General Editorial	typo	2-14	2.5	Total available water is reported in Table 2-5 by water year.	Should refer to Table 2-6. Also occurs in 2nd paragraph of this section.
TM-6	TMorgan	General Editorial	clarify text	2-14	2.5	reported AMI-estimated extractions	first use of AMI - spell it out for reader
TM-7	TMorgan	General Editorial	clarify text	2-14	2.5	c Groundwater extraction reporting for 2023 was updated based on additional extraction reporting.	The 2023 groundwater extraction information was updated in this report? In agency files AND this report? Explain to reader how the new data was accounted for.
TM-8	TMorgan	General Editorial	clarify text	2-14	2.5	d Groundwater extraction reporting for 2024 were unavailable at the time of reporting.	Like Section 2.2, when will these data become available? Help the reader understand FCGMA's plans for updating or amending this report.
TM-9	TMorgan	General Technical	clarify text	2-15	2.6	Because neither model simulates water years 2023 and 2024...	What is the plan with respect to the 2023 and 2024 data? Will this or future annual reports be revised when the groundwater models are rerun with these data?
TM-10	TMorgan	General Technical	clarify text	2-15	2.6	...the change in storage for those two water years was calculated using the series of linear regressions used in previous annual reports...	Has a comparison been done between the model-derived storage changes and the linear regression approach? Are we confident that the mix of analytical methods shown in Table 2-7a reasonably reflect reality? Should the linear regression values have a +/- range associated with them?
TM-11	TMorgan	Technical	inferences re: changes in storage	2-17	2.6.1.2	data contained in Table 2-7b	The FCA in the ELP model shows <u>above normal precipitation years</u> changing the storage from -393 to 5,962 AFY. The linear regression method infers storage changes at 6,030 and 5,271 AFY for the <u>wet years of 2023 and 2024</u> , respectively. With the linear regression method inferring storage changes in wet years only slightly greater than the modeled maximum in above normal years, does this imply that the linear regression method is underestimating storage change?
TM-12	TMorgan	Technical	reason for groundwater declines	3-1	3.1.1	The periodic evaluation found that groundwater production exceeding the sustainable yield is the primary cause of groundwater level declines in the eastern WLPMA and northern ELPMA.	Sustainable yield is a basin-wide, long term value. It seems too simplistic to say that a single years pumping (this is an annual report so we are focused on conditions for the most recent WY) is responsible for a single key well with declining water levels in eastern WLPMA. The report states "Elsewhere in the LPV Basin, where measured, groundwater elevations were either stable or increased between water years 2015 and 2024." That statement implies that groundwater extractions in excess of the long-term sustainable yield have NOT resulted in basin-wide groundwater level declines? Seems like language to the effect of "Long-term water levels were either stable or increasing between WY 2015 and 2024, however groundwater level declines were identified in the eastern WLPMA and northern ELPMA. The current monitoring well network is insufficient to determine if these declines are a function of localized pumping patterns and/or differing aquifer hydraulic properties. Further research is needed to better understand the hydrologic dynamics in these areas."
TM-13	TMorgan	General Technical	water level data	5-19	Fig 2-5	Contours	Why contour the wells in ELP? There are so few wells. Not sure it has significant meaning. Wells in WLP are not contoured.
TM-14	TMorgan	General Technical	water level data	5-23	Fig 2-7 & 2-8	Contours	Not sure how helpful the small portion of the basins that are contoured really are. A color ramp of the GW elevations at each well might be a simpler way to present these data.

**Specific Comments from the Las Posas Valley Basin Technical Advisory Committee  
Water Year 2024 Draft Annual Report**

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment
TM-15	TMorgan	General Technical	hydrographs	5-31	Fig 2-11	Labels	The blue open circles plotted on the hydrographs are labeled as "...Elevation Not Measured" and "Measurements not collected between October 2 and October 29, 2023 or March 2 and March 29, 2023. So, if the hydrograph shows a blue open circle (representing a value), but the data point is labelled as "...Elevation Not Measured", please clarify how to interpret these data points.
TM-16	TMorgan	General Technical	hydrographs	5-31	Fig 2-11	Labels	Is the black line referring to pressure transducer data? If so, suggest adding that to label. If not, add that they are manual measurements. why are there manual VCWPD WLE measurements shown for 06R01S?
TM-17	TMorgan	General Technical	hydrographs	5-31	Fig 2-11	Hydrograph for 12H01S	Why does this graph show a ~100ft decline in the WLE from ~2012-2014? Is that real? If so, it warrants and explanation in the text. If it is a graphing artifact, then recommend regraphing to eliminate the decline.
TM-18	TMorgan	General Technical	hydrographs	5-35	Fig 2-12b	Hydrograph for 01B02	Did the WLE actually rise ~200 ft then fall ~200 ft as depicted in the hydrograph? Looks like a suspect data point(s) are included in the plot. Suggest adding a note indicating that this (these) data point(s) are suspect, if that is the appropriate explanation.
TM-19	TMorgan	General Technical	hydrographs	5-35	Fig 2-12b	Hydrograph for 01D02	Why the 60 ft rise in WLE from October 2023 and March 2024 when over the previous +/-50 yrs the annual WLE fluctuation was in the 10-20 ft range?
TM-20	TMorgan	General Editorial	hydrographs	5-35	Fig 2-12b	Data point labels	Data point labels for 01G01S and 10J01S have missing letters.
TM-21	TMorgan	General Technical	project suite	3-2	3.1.2	Expanded project suite to include:	Suggest adding "potential" to phrase. "Expanded potential project suite to include:..."
TM-22	TMorgan	General Technical	recommendations	3-2	3.1.3	This could include the construction of new dedicated monitoring wells	Suggest adding a phrase to this sentence - "This could include the construction of new dedicated monitoring wells, incorporation of additional monitored stakeholder owned wells, and the development...."
CT-1	Chad Taylor	Editorial	typo	i	ES, 4th paragraph	In the WLPMA, the volume of groundwater in storage increased by approximately 4,400 AF in water year 2024, with the largest increases occurring in the western portion of management area, near the Oxnard Subbasin.	In the WLPMA, the volume of groundwater in storage increased by approximately 4,400 AF in water year 2024, with the largest increases occurring in the western portion of <u>the</u> management area, near the Oxnard Subbasin.
CT-2	Chad Taylor	Technical	Water level declines and sustainable yield	ii	ES, last sentence of section	These ongoing groundwater elevation declines in eastern WLPMA and northern ELPMA indicate that groundwater production from the LPV Basin exceeds the sustainable yield.	While it may be true that production has exceeded sustainable yield basin-wide, groundwater elevation declines could occur in these areas even if basin-wide groundwater use was less than the sustainable yield. This statement should be expanded to provide more detail.
CT-3	Chad Taylor	Editorial	Acronym definition	1-1	1.1.1, first sentence of first paragraph	and all agricultural and M&I users	Define M&I
CT-4	Chad Taylor	Technical	Recent weather conditions	1-4	1.2.1	The average annual precipitation in the LPV between 2016 and 2024 was 16.4 inches per year, which is approximately 6% higher than the 1956 to 2024 average.	Recommend indicating why this statistic matters
CT-5	Chad Taylor	Technical	Recent streamflow and precipitation	1-4 - 1-5	1.2.2; Table 1-1 and last paragraph of section	Average daily flows in Arroyo Las Posas reflect the water year precipitation (Section 1.2.1) with the highest daily average flows (over 30 cfs) measured at gauge 841A during the 2010 to 2024 period occurring in 2010, 2011, 2017, 2023, and 2024. Water years 2010, 2011, and 2017 were above normal water years in which water year precipitation was approximately 140% of the long-term mean. Water years 2023 and 2024 were wet water years in which water year precipitation was approximately 185% of the long-term average (Table 1-1; Figure 1-4).	Why was flow in 2010 and 2011 greater than 2023 and 2024 when precipitation was greater in 2023 and 2024? If this is correct then the statement in the first sentence of the paragraph may be a partial explanation of the relationship between flow in the Arroyo and precipitation.
CT-6	Chad Taylor	Technical	Report organization	1-5	1.3	This annual report is organized according to the GSP Emergency Regulations.	What about organizing and including formats and information indicated in the October 2023 Groundwater Sustainability Plan Implementation: A Guide to Annual Reports, Periodic Evaluations, & Plan Amendments guidance document from DWR?
CT-7	Chad Taylor	Editorial	Technical terminology	2-1	2.1, first paragraph	These maps show the seasonal low (fall 2023) and high (spring 2024) groundwater elevations for the 2024 water year. Groundwater elevations are best constrained in the FCA (Figures 2-7 and 2-8), and least constrained in the GCA (Figures 2-9 and 2-10).	Consider defining the term "constrained" for non-technical readers.
CT-8	Chad Taylor	Editorial	Heading title	2-1	2.1.1 heading name	Groundwater Elevation Contour Maps	While groundwater elevation contour maps are discussed in this section, it presents other information about location specific elevation changes etc. Consider changing heading to reflect contents of the section.
CT-9	Chad Taylor	Editorial	Heading title	2-7	2.1.2 heading name	Groundwater Elevation Hydrographs	This section appears to deal more with comparison to sustainable management criteria than presentation and/or discussion of hydrographs. Consider changing heading to reflect the contents of the section.

**Specific Comments from the Las Posas Valley Basin Technical Advisory Committee  
Water Year 2024 Draft Annual Report**

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment
CT-10	Chad Taylor	Technical	Groundwater elevation monitoring	2-7	2.1.2.1 and 2.1.2.2	<p>Fall 2023 groundwater elevations were measured in three of the five key wells in the WLPMA. The elevations at two of these wells were below the measurable objectives (Table 2-1; Figure 2-11). Spring 2024 groundwater elevations were above the measurable objective groundwater elevations at two (02N20W08F01S and 02N21W12H01S) of the three of the key wells measured in the WLPMA (Table 2-1; Figure 2-11).</p> <p>Fall 2023 groundwater elevations were measured in three of the five key wells in the WLPMA. The elevations at two of these wells, wells 02N20W06R01S and 02N21W11J03S, were below the minimum thresholds (Table 2-1). Spring 2024 groundwater elevations were above the minimum threshold groundwater elevations at all of the key wells measured in the WLPMA (Table 2-1; Figure 2-11).</p>	3 out of 5 is 60 percent of key wells in the WLPMA, which is problematic for monitoring sustainability. 2/3 of the monitored wells below the MT speaks to a greater need to monitor all the Key Wells.
CT-11	Chad Taylor	Technical	Groundwater use records	2-8	2.2	[Water year 2024 groundwater extraction data were not available at the time of reporting. Accordingly, Tables 2-2 and 2-3 summarize extraction information through the end of water year 2023. These tables, and the narrative to this section, will be updated upon receipt of 2024 extraction data. Additionally, because water year 2024 data are not available, Figure 2-14, which displays the spatial distribution of groundwater extractions in the LPV Basin, has not been prepared. This figure will be prepared upon receipt of 2024 extraction data.]	These missing data make a complete technical assessment of conditions in the LPV Basin challenging.
CT-12	Chad Taylor	Editorial	Typo	2-14	2.5, second paragraph	Similar to Table 2-2 and 2-3, the groundwater extractions for water years 2021 and 2022 presented in Table 2-5	Appears that this reference should be Table 2-6.
CT-13	Chad Taylor	Editorial	Acronym definition	2-14	2.5, second paragraph	a combination of reported AMI-estimated extractions for the period	Consider defining the acronym AMI
CT-14	Chad Taylor	Editorial	Footnotes	2-14	Table 2-6	2022 <sup>c</sup> 2023 <sup>d</sup>	These footnotes in the table appear to be applied to the wrong years.
CT-15	Chad Taylor	Technical	Change in storage estimation	2-14 to 2-15	2.6	Because neither model simulates water years 2023 and 2024, the change in storage for those two water years was calculated using the series of linear regressions used in previous annual reports (FCGMA 2022, 2023, 2024a). The estimated change in storage calculated using this method differs from the estimates presented in the Periodic Evaluation, which were based on measured groundwater elevation changes from a smaller subset of wells. The series of linear regressions employed here better capture the spatial variability in storage change but are limited to the FCA (Table 2-7b; Figure 2-15).	Is a comparison of the model-based and regression-based change in storage estimates available? How much difference is there in the changes in storage presented previously to those in this annual report?
CT-16	Chad Taylor	Technical	Water level declines and sustainable yield	3-1	3.1.1	The periodic evaluation found that groundwater production exceeding the sustainable yield is the primary cause of groundwater level declines in the eastern WLPMA and northern ELPMA.	As in Comment CT-2, while it may be true that production has exceeded sustainable yield basin-wide, groundwater elevation declines could occur in these areas even if basin-wide groundwater use was less than the sustainable yield. This statement should be expanded to provide more detail.
CT-17	Chad Taylor	Editorial	typo	3-3	3.2, bullet 4	*Consulted with the LPV TAC to inform development of the LPV Basin Optimization Yield Study, a study planned for completion in 2025 that will inform the Rampdown Rate required to achieve long-term groundwater sustainability by 2040.11	The 11 after 2040 appears to be a typographical error
CT-18	Chad Taylor	Editorial	typo	3-4	3.3	On December 9, 2024, FCGMA submitted the initial draft Basin Optimization Plan for review and consultation to the LPV PAC and TAC.	The draft of the Basin Optimization Plan was submitted to the TAC on December 12, 2024
CT-19	Chad Taylor	Technical	Groundwater contours	5-11 and 5-13	Figures 2-1 and 2-2		How were the contours upstream of 07G01 defined in both shallow alluvial aquifer maps and also the contours downstream of 09Q08 in Figure 2-1? There do not appear to be wells with measured water levels up and downstream of these wells for generating contours.
CT-20	Chad Taylor	Technical	Groundwater contours	5-15 and 5-17	Figures 2-3 & 2-4		Recommend explaining why there are no contours for the Epworth Gravels Area in these two figures, both of which are titled 'Groundwater Elevation Contours...'

**Specific Comments from the Las Posas Valley Basin Technical Advisory Committee  
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CT-21	Chad Taylor	Technical	Groundwater contours	5-19	Figure 2-5		Why weren't the wells in WLPMA included in the contouring for the USP aquifer? There are measurements not in parentheses in WLPMA.
CT-22	Chad Taylor	Technical	Groundwater contours	5-21	Figure 2-6		Why are there no contours drawn on this figure? Recommend explaining why contours weren't created for the USP aquifer for this period.
CT-23	Chad Taylor	Technical	Groundwater contours	5-23	Figure 2-7		The 20 foot contour interval makes the northern ELPMA appear flat when there is significant complexity in the area. Recommend either modifying the contour interval for this area
CT-24	Chad Taylor	Technical	Groundwater contours	5-23 and 5-25	Figures 2-7 & 2-8		How were the contours in the neighboring basins developed, what is the assumed relationship between the Oxnard basin and the WLPMA and the Pleasant Valley basin and ELPMA, and how was this relationship used in the preparation of these contours. If the areas were contoured separately, recommend removing the contours from the neighboring basins from the maps. Otherwise, the apparent hydrologic disconnection between the basins should be discussed.
CT-25	Chad Taylor	Technical	Groundwater contours	5-31 through 5-39	Figures 2-11 through 2-13		Finding the locations of the hydrograph wells is challenging. Consider including a map with pointers to well locations if continuing to present multiple hydrographs on a single figure. Otherwise, the recommended format from the DWR October 2023 Groundwater Sustainability Plan Implementation: A Guide to Annual Reports, Periodic Evaluations, & Plan Amendments guidance document is a good way to show all the information a reader is interested in seeing on hydrographs.