Fox Canyon Groundwater Management Agency

AGENDA PACKAGE

Board Regular Meeting
of
June 25, 2025

FOX CANYON GROUNDWATER MANAGEMENT AGENCY

A STATE OF CALIFORNIA WATER AGENCY

NOTICE OF MEETING

NOTICE IS HEREBY GIVEN that the Fox Canyon Groundwater Management Agency (FCGMA) Board of Directors will hold a **Board Hybrid Meeting** at **12:30 P.M.** on **Wednesday, June 25, 2025,** in the **Board of Supervisors Board Room and via Zoom**, at the Ventura County Government Center, Hall of Administration, Main Plaza Level at **800 South Victoria Avenue**, **Ventura**, **California**.

To attend the public portion of the meeting via Zoom, click here:
https://us02web.zoom.us/j/84755291260?pwd=pxZh0C8b3qzyDxZ68aIYJ6RftxhByg.1
(Passcode 585594)

FCGMA BOARD REGULAR MEETING AGENDA

June 25, 2025
12:30 P.M.

Welcome to the meeting of the Fox Canyon Groundwater Management Agency Board of Directors, also sitting as watermaster for the Las Posas Valley Basin and the groundwater sustainability agency for the Las Posas Valley Basin, the Pleasant Valley Basin, and the Oxnard Subbasin. For more information, full agenda packets, or past meeting information, visit *www.fcgma.org*.

In compliance with the Americans with Disabilities Act, all possible accommodations will be made for individuals with disabilities so they may attend and participate in meetings. If special assistance is needed, please call Agency staff at (805) 654-2014 at least 24 hours prior to the meeting so proper arrangements may be assured. If requested, and as possible, agendas will be provided in alternative formats.

Agenda items are numbered for identification purposes only and may not necessarily be considered in this order. Agenda items are grouped under Las Posas Valley Watermaster (LPV Watermaster) or under Fox Canyon Groundwater Management Agency (FCGMA), if the item directly applies only to that entity. The Board reserves the right to limit each speaker to five (5) minutes per subject or topic if necessary. The public portion of every public meeting of the Board of Directors is recorded. Please see the "STANDING NOTICES" section at the end of this Agenda for more information, including hybrid attendance and public participation.

OPENING

1. **Call to Order** – The Board Chair will call the meeting to order.

2. **Pledge of Allegiance** – A Board member will lead the Pledge of Allegiance.

3. **Roll Call** – Attending Board members, alternates, and staff will be recorded by the Board Clerk.

4. **Agenda Review** – Consider and approve by majority vote, any minor revisions to Board Agenda items and/or attachments and any item(s) added or removed from this Agenda.

5. **Public Comments** – Audience members may speak about Agency-related matters not on today's Agenda. California State law does not allow any response or action from the Board concerning non-agenda topics at this time; however, topics can be placed on future agendas or referred to staff. Please come to the podium and state your name and affiliation for the record before commenting on any particular subject.

6. **Executive Officer's Comments** – Brief announcements and administrative report on Agency workforce activities.

7. **Board Member Comments** – An opportunity for Board Members to make comments or to communicate with other directors, staff, and/or the public regarding non-agenda topics.

CONSENT AGENDA

Routine items are placed under the Consent portion of this Agenda and need only be reviewed and approved by one single motion. Consent Agenda items are grouped under LPV Watermaster or under FCGMA, if the item directly applies only to that entity. Consent items generally require no discussion; however, they may be debated or voted on by moving them to the "Regular Agenda" portion at the Board's discretion.

CONSENT AGENDA – FCGMA Items

8. **FCGMA Budget to Actual Report for May 2025** – *(New Item)*
RECOMMENDATION: Receive and file the monthly financial report.

CONSENT AGENDA – LPV Watermaster Items

9. **LPV Watermaster Budget to Actual Report for May 2025** – *(New Item)*
RECOMMENDATION: Receive and file the monthly financial report.

REGULAR AGENDA

Regular Agenda items are heard at the Board's discretion and may be heard at any time during the meeting. Regular Agenda items are grouped under LPV Watermaster or under FCGMA, if the item directly applies only to that entity.

REGULAR AGENDA – LPV Watermaster Items

10. **Adopt Proposed Resolution No. 2025-03 to Establish the Amount of the Las Posas Valley Overuse Assessment on the Use of Groundwater in Excess of What the Las Posas Valley Adjudication Judgment Allows** – *(New Item)*
RECOMMENDATIONS: (1) Receive an Agency staff presentation on the Las

Posas Valley (LPV) Overuse Assessment establishing the amount (or rate) of the Overuse Assessment; and **(2)** Adopt Resolution No. 2025-03 establishing the amount of the Overuse Assessment on groundwater use in excess of what's allowed under the LPV Adjudication Judgment equal to the prevailing Calleguas Municipal Water District's Tier 1 rate at the end of the cure period Water Year 2024, setting the interest rate on delinquent Overuse Assessments equal to the current real property tax delinquency rate for Ventura County, and directing staff to deposit Overuse Assessments collected from water right holders in the separate Watermaster Overuse Assessment account

11. **Adopt the 2025 Las Posas Valley Basin Optimization Plan and Related Response Reports** – *(Returning Item)* **RECOMMENDATIONS: (1)** Receive an Agency staff presentation on the Las Posas Valley Basin Optimization Plan and related Recommendation and Response Reports; **(2)** Approve the Response Reports to the Policy Advisory and Technical Advisory Committees' Recommendation Reports; and **(3)** Adopt the Las Posas Valley Basin Optimization Plan.

12. **Approve and Authorize the Interim Executive Officer to Execute a Professional Services Contract Modification with Dudek to Prepare the Las Posas Valley Basin 2025 Optimization Yield Study** – *(Returning Item)* **RECOMMENDATIONS: (1)** Receive a presentation from Agency Staff; and **(2)** Approve and authorize the Interim Executive Officer to execute a professional services contract modification with Dudek for the development of the 2025 Basin Optimization Yield Study for the Las Posas Valley Basin.

13. **Las Posas Valley Basin Optimization Yield Study Preferred Modeling Alternative Approach** – *(Returning Item)* **RECOMMENDATIONS: (1)** Receive a presentation from Agency staff on the Las Posas Valley Basin Optimization Yield Study preferred modeling alternative, preparation schedule, related Committee Recommendation Reports, and related Watermaster Response Reports; and **(2)** Provide direction to staff on preferred modeling alternative, schedule, and response reports.

14. **Del Norte Water Company (WMID 3500) and Vanoni Group (WMIDs 1095, 1120, 1121) Protests and Requests for Refund of WY2023 Basin Assessment** – *(Returning Item)* **RECOMMENDATIONS: (1)** Receive a presentation from Agency staff on the protests and requests for refund of Water Year 2023 Las Posas Valley Watermaster Basin Assessments submitted by Del Norte Water Company [WMID 3500] (DNWC) and Mary Vanoni on behalf of WMIDs 1095, 1120, 1121 (collectively, the Vanoni Group); and **(2)** Deny the DNWC and the Vanoni Group protests and requests for refund.

CLOSED SESSION AGENDA

Discussions of Closed Session Agenda items are closed to the public. The Chair will announce when the Board is going into closed session. Closed session items may be heard at any time during the meeting.

15. **CONFERENCE WITH LEGAL COUNSEL – EXISTING LITIGATION (Gov. Code, §54956.9) PURSUANT TO GOVERNMENT CODE SECTION 54956.9, SUBDIVISION (d), PARAGRAPH (1): NAME OF CASE**: City of Oxnard v. Fox Canyon Groundwater Management Agency, Los Angeles County Superior Court Case No. 20STCP00929

16. **CONFERENCE WITH LEGAL COUNSEL – EXISTING LITIGATION (Gov. Code, §54956.9) PURSUANT TO GOVERNMENT CODE SECTION 54956.9, SUBDIVISION (d), PARAGRAPH (1): NAME OF CASE:** Las Posas Valley Water Rights Coalition v. Fox Canyon Groundwater Management Agency, Santa Barbara County Superior Court Case No. VENCI0059700

17. **CONFERENCE WITH LEGAL COUNSEL – EXISTING LITIGATION (Gov. Code, §54956.9) PURSUANT TO GOVERNMENT CODE SECTION 54956.9, SUBDIVISION (d), PARAGRAPH (1): NAME OF CASE:** OPV Coalition et al v. Fox Canyon Groundwater Management Agency, Santa Barbara County Superior Court Case No. VENCI00555357

18. **Adjourn Board Meeting.**

STANDING NOTICES

The FCGMA Board strives to conduct accessible, orderly, and fair meetings where everyone can be heard on the issues. The Board Chair will conduct the meeting and establish appropriate rules and time limitations for each item. The Board can only act on items designated as Action Items. Action items on the agenda are staff proposals and may be modified by the Board as a result of public comment or Board member input.

Public Comment: Public comment is the opportunity for members of the public to participate in meetings by addressing the Fox Canyon Board of Directors in connection with one or more agenda or non-agenda items.

The following options allow for public participation:

1. Join the Zoom Meeting as an Attendee:
   https://us02web.zoom.us/j/84755291260?pwd=pxZh0C8b3qzyDxZ68aIYJ6RftxhByg.1
   Webinar ID: 847 5529 1260
   Passcode: 585594
   With this option you will be able to raise your hand, and the Clerk of the Board will give you speaking abilities to make a public comment. If you experience technical difficulties during Zoom meeting attendance that impact your ability to hear or see meeting proceedings, please contact the host via chat, or raise your hand for Q&A inside the Zoom Client. If you are unable to contact the host via the Zoom Client's chat or Q&A features, please call (805) 654-2014 and report the issue, then consider submitting written comment according to option 4, below.
2. During meetings held in the Board of Supervisors Boardroom, we have access to livestreaming capabilities. Observe the Board of Directors meeting streaming live by navigating to the "Current and Upcoming Meetings" section of our website and clicking on the video icon button next to the meeting listing at: https://fcgma.org/board-agendas-broadcasts-minutes/. *This option is currently only available for meetings held in the BOS Boardroom.*
3. Call in to listen to the meeting:
   +1 669 900 6833 US (San Jose)
   +1 408 638 0968 US (San Jose)
   +1 669 444 9171 US
   +1 253 205 0468 US
   +1 253 215 8782 US (Tacoma)
   +1 346 248 7799 US (Houston)
   +1 719 359 4580 US
   +1 646 931 3860 US
   +1 689 278 1000 US
   +1 301 715 8592 US (Washington DC)
   +1 305 224 1968 US
   +1 309 205 3325 US
   +1 312 626 6799 US (Chicago)
   +1 360 209 5623 US
   +1 386 347 5053 US
   +1 507 473 4847 US
   +1 564 217 2000 US
   +1 646 876 9923 US (New York)
   Webinar ID: 847 5529 1260
   Passcode: 585594
   Options 2 and 3 will not allow you to make direct speaking comments. If you wish to make a written comment, please follow the steps below.
4. If you wish to make a written comment on a specific agenda item, please submit your comment via email by 5:00 p.m. on the Monday prior to the Board regular meeting. Please submit your comment to the Clerk of the Board at FCGMA@ventura.org. Please indicate in the subject line of

your email the agenda item number (e.g., Item 9). Your comment will be read by the Board of Directors and placed into the record.

5. If you are watching the live stream of the Board meeting and would like to make either a general public comment (Item 5) for items not on the day's agenda or to comment on a specific agenda item as it is being heard, please submit your comment via email to the Clerk of the Board at FCGMA@ventura.org. Please indicate in the email subject line, the agenda item number (e.g., Item No. 9). Every effort will be made to read your comment into the record, but some comments may not be read due to time limitations. Comments received after an agenda item will be made part of the record if received prior to the end of the meeting.

Administrative Record: Material presented as part of testimony will be made part of the Agency's record, and 10 copies should be left with the Board Clerk. This includes any memos, presentations, maps, etc. If possible, in advance of the meeting, email a PDF of your materials to FCGMA@ventura.org.

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ADA Accommodations: Persons who require accommodation for any audio, visual, or other disability in order to review an agenda or to participate in the Board of Directors meeting per the Americans with Disabilities Act (ADA), may request such accommodation in writing addressed to the Clerk of the FCGMA Board, 800 So. Victoria Avenue, Location #1610, Ventura, CA 93009-1610, via emailing FCGMA@ventura.org or via telephone by calling (805) 654-2014. Any such request should be made at least 48 hours prior to the meeting so staff can make the necessary arrangements.

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Availability of Complete Agenda Package: A copy of the complete agenda package is available for examination at the FCGMA office during regular working hours (8:00 a.m. to 5:00 p.m. Monday through Friday) beginning 72 hours before the regular Board meeting. Agenda packet contents are also posted on the FCGMA website as soon as possible and left there for archival retrieval in case reference is needed on previously considered matters. Questions about specific items on the agenda should be directed to the Agency's Executive Officer.

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Continuance of Items: The Board will endeavor to consider all matters listed on this agenda. However, time may not allow the Board to hear all matters listed. Matters not heard at this meeting may be carried over to the next Board meeting or to a future Board meeting. Participating individuals or parties will be notified of the rescheduling of their item prior to the meeting. Please contact the Agency Clerk to find out about rescheduled items.

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The Ralph M. Brown Act: It is the intent of the law that the actions of this Board be taken openly and that their deliberations be conducted openly. Read about the Ralph M. Brown Act via this link: https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?chapter=9.&division=2.&lawCode=GOV&part=1.&title=5.

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Agency Information and Updates: Our website address is https://fcgma.org/. Information available online includes the Board's meeting schedule, a list of the Board members and staff, general information, and various Agency forms. If you would like to be added to our email notification list, or to speak to a staff member, please contact the FCGMA Clerk of the Board at (805) 654-2014 or via email at FCGMA@ventura.org.

June 25, 2025

Board of Directors
Fox Canyon Groundwater Management Agency
800 South Victoria Avenue
Ventura, CA 93009-1600

SUBJECT: Executive Officer's Report – *(Returning Item)*

RECOMMENDATION: Receive and file this informational report.

FCGMA REGISTRATIONS

As of May 5, 2025, twenty-three certified notices have been mailed to new well owners, each providing a 30-day window to register. Of these, four recipients for seven wells will be issued a second notice due to non-response within the allotted timeframe. Additionally, 2 notices were returned as unclaimed or refused, from the same well owner address, according to U.S. Postal Service documentation. Staff will continue to investigate and assess whether enforcement actions are warranted.

FCGMA SEMI-ANNUAL EXTRACTION STATEMENT REPORTING

2025-1 SAES

On May 16, 2025, approximately 400 Semi-Annual Extraction Statements (SAES) were due for the 2025-1 reporting period, covering extractions from October 1, 2024, through March 31, 2025, in the Oxnard and Pleasant Valley (OPV) and Las Posas Valley (LPV) basins. Based on a preliminary review of submitted materials and payments, staff anticipates issuing just over 80 Notices of Violation to non-reporters.

Completing this initial review and payment processing in under a month, an effort that typically takes four months or more, reflects the positive impact of recent hiring of additional staff. Staff is now actively addressing the reporting backlog and compiling statistics to report to your Board at an upcoming meeting.

An additional 31 SAES will be issued to OPV operators pursuant to the Board's recent approval of Temporary Variances for the 2024/2025 Water Year.

LPV WATERMASTER ASSESSMENTS:

WY 2024 BASIN ASSESSMENT UPDATE

As reported in the June 13, 2025, Executive Officer's Report, on September 25, 2024, the Watermaster Board adopted a Basin Assessment for Las Posas Valley Basin for Water

Year (WY) 2024 of $64.58 to be invoiced quarterly at $16.145. Three quarterly Basin Assessment (BA) invoices have been sent to water right holders as of June 18, 2025. Payments not received within one month of the due date are considered delinquent and shall bear interest at the current real property tax delinquency rate for Ventura County per the Judgment.

First quarterly Basin Assessment (BA) invoices for Water Year 2024 were sent to water right holders via email on October 2,2024, with payments due November 1, 2024. Two notices of delinquency were sent to delinquent Water Right Holders (WMIDs) on December 11 and December 21, 2024. As of June 18, 2025, $25,705.93 is delinquent from 11 WMIDs, $ 22,832.94 in Basin Assessments and $2,872.99 in Basin Assessment interest. A list of delinquent 2024-1 WMIDs, as of June 18, 2025, is available on the Watermaster website: https://s42135.pcdn.co/wp-content/uploads/2025/06/LPV-Basin-Assess-Delinq-Report-2024-1_2025-06-18.pdf.

On January 6, 2025, Watermaster released the **second** quarterly BA invoice with a due date of January 30, 2025. Two notices of delinquency were sent to delinquent WMIDs on March 10 and March 20, 2025. As of June 18, 2025, $32,443.54 is delinquent from 16 WMIDs, $29,411.91 in Basin Assessments and $3,031.63 in Basin Assessment interest. A list of delinquent 2024-2 WMIDs, as of June 18, 2025, is available on the Watermaster website at: https://s42135.pcdn.co/wp-content/uploads/2025/06/LPV-Basin-Assess-Delinq-Report-2024-2_2025-06-18.pdf.

On April 1, 2024, Watermaster released the **third** quarterly BA invoice with a due date of May 1, 2025. Payments not received within a month of the due date are considered delinquent and shall bear interest at the current real property tax delinquency rate for Ventura County per the Judgment. As of June 20, 2025, $38,650.99 is delinquent from 24 WMIDs, $35,137.24 in Basin Assessments and $3,513.75 in Basin Assessment Interest. A list of delinquent 2024-3 WMIDs, as of June 20, 2025, is available at: https://s42135.pcdn.co/wp-content/uploads/2025/06/LPV-Basin-Assess-Delinq-Report-2024-3_2025-06-20.pdf.

Adopted Annual Allocations for WY 2024 and the schedule of quarterly installments are available on the Watermaster website at: https://fcgma.org/annual-allocations-wy-2024/.

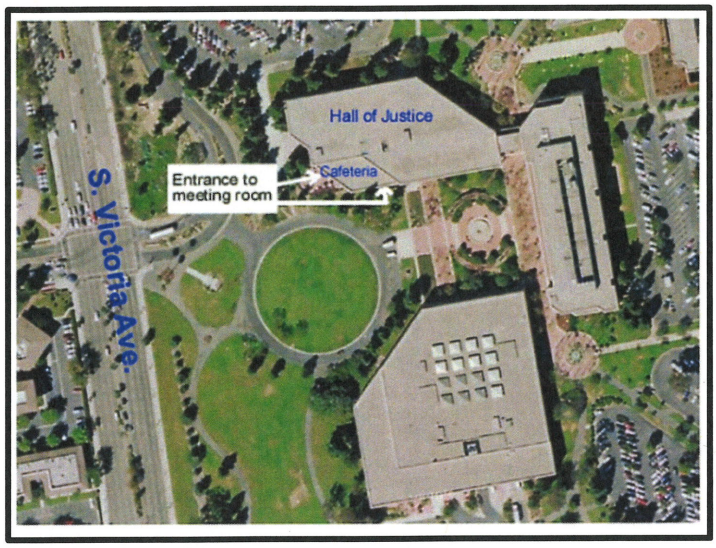
2023-1 DELINQUENT BASIN ASSESSMENTS

On May 5, 2024, Watermaster released the only installment for WY 2023 BA Invoice with a due date of April 5, 2024. Payments not received within a month of the due date are considered delinquent and shall bear interest at the current real property tax delinquency rate for Ventura County per the Judgment. As of June 18, 2025, Delinquent payments for WY 2023 amount to $11,479.58 from 7 WMIDs, $9,689.28 in Basin Assessments and $1,790.30 in Basin Assessment Interest. Staff and counsel are taking the next steps consistent with its enforcement authorities to collect the delinquent basin assessments. A list of delinquent 2023-1 WMIDs, as of June 18, 2025, is available at: https://s42135.pcdn.co/wp-content/uploads/2025/06/LPV-Basin-Assess-Delinq-Report-2023-1_2025-06-18.pdf.

MEETINGS

BOARD MEETINGS

The Board of Supervisors' Boardroom will be unavailable for meetings in July. **The July 23rd FCGMA Board regular hybrid meeting is now scheduled from 11 am to 3 pm at the Ventura County Hall of Justice, in the Pacific Conference Room (PCR).**



The Hall of Justice is located a short walk across the plaza from the Hall of Administration, where your Board usually meets. The PCR is on the lower level of the Hall of Justice, with entrances through the cafeteria.

For more information about Board and Committee meetings, please see the attached list of Scheduled Meetings for Calendar Year 2025 (Exhibit 6A).

CONCLUSION:

This letter has been reviewed by Agency Counsel. If you have any questions, please call me at (805) 654-2040.

Sincerely,

Jeff Palmer
Interim Executive Officer

Attachment:
Exhibit 6A – Scheduled Meetings for Calendar Year 2025

Fox Canyon Groundwater Management Agency (FCGMA)
Scheduled Meetings for Calendar Year 2025

Board Regular Meetings
Fourth Wednesday, Monthly

Date	Start Time	Room
Wednesday, January 22	12:30 PM	BOS
~~Wednesday, February 26~~	~~12:30 PM~~	~~BOS~~
Wednesday, March 26	12:30 PM	BOS
Wednesday, April 23	12:30 PM	BOS
~~Wednesday, May 28~~	~~12:30 PM~~	~~BOS~~
Wednesday, June 25	12:30 PM	BOS
Wednesday, July 23	11:00 AM	PCR
Wednesday, August 27	12:30 PM	BOS
Wednesday, September 24	12:30 PM	BOS
Wednesday, October 22	12:30 PM	BOS
Wednesday, December 10	12:30 PM	BOS

Board Special Meetings
Typically, Second Friday, Monthly, As Needed

Wednesday, February 12	12:30 PM	BOS
~~Friday, April 11~~	~~12:30 PM~~	~~LPAR~~
Friday, May 9 – *Closed Session*	12:30 PM	LPAR
Friday, May 23 – *Closed Session*	9:30 AM	MPR
Friday, June 13	12:30 PM	MPR
Friday, July 11	12:30 PM	LPAR
Friday, August 8	12:30 PM	LPAR
Friday, September 12	12:30 PM	MPR
Friday, October 10	12:30 PM	LPAR
Friday, November 14	12:30 PM	MPR

Executive Committee Meetings
As Needed

Thursday, January 9	1:30 PM	LPAR
Monday, March 17	10:00 AM	LPAR
~~Friday, April 18~~	~~1:30 PM~~	~~LPAR~~
Thursday, May 22 – *CS*	9:30 AM	ACR
Thursday, July 10	1:30 PM	LPAR
Thursday, September 4	1:30 PM	MPR
Thursday, November 6	1:30 PM	MPR

Fiscal Committee Meetings
As Needed

Thursday, February 27	9:00 AM	ACR
Tuesday, March 18	10:00 AM	LPAR
Tuesday, April 15	10:00 AM	MPR
~~Tuesday, May 6~~	~~10:00 AM~~	~~MPR~~
~~Tuesday, June 17~~	~~10:00 AM~~	~~MPR~~
Tuesday, July 15	10:00 AM	MPR
Tuesday, August 19	10:00 AM	MPR

Operations Committee Meetings
As Needed

~~Monday, February 3~~	~~1:30 PM~~	~~MPR~~
Monday, April 7	12:30 PM	MPR
~~Monday, June 2~~	~~1:30 PM~~	~~MPR~~
Monday, August 4	1:30 PM	MPR
Monday, October 6	1:30 PM	MPR

ABOUT SCHEDULED MEETINGS

- All meetings will be held at the Ventura County Government Center, Administration Building, at 800 South Victoria Avenue, Ventura, California, unless otherwise noted.
- **Special meetings and committee meetings are subject to necessity and may be rescheduled or may not be noticed to occur.**
- When a meeting is officially noticed per the Ralph M. Brown Act, it is confirmed to occur.
- To stay up to date, contact FCGMA@ventura.org to subscribe to our notification list.
- Alterations of the time or room are possible, so please check for facility or start time changes each month.
- Meeting schedules are online at https://fcgma.org/events/.

KEY	
"As Needed"	Subject to Necessity
Row is Gray	Already Occurred
~~Strikethrough~~	Meeting Not Held
ACR	Atlantic Conference Room
BOS	Board of Supervisors Hearing Room
LPAR	Lower Plaza Assembly Room
MPR	Multi-Purpose Room
PCR	Pacific Conference Room, in the Hall of Justice Building

PREPARED BY : Daiva Pekinas

A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P
	FCGMA FUND: O170 UNIT: 5795	**EXPENDITURES BY ACCOUNTING PERIOD**													
		OBJ	**PROGRAM**	**TOTAL**	**AP 01/ July**	**AP 02/ August**	**AP 03/ September**	**AP 04/ October**	**AP 05/ November**	**AP 06/ December**	**AP 07/ January**	**AP 08/ February**	**AP 09/ March**	**AP 10/ April**	**AP 11/ May**
1	**CASH BALANCE 07-01-24**			**6,988,697.31**	6,988,697.31	7,779,349.81	6,644,333.02	5,493,290.11	5,213,793.63	4,034,911.42	3,653,443.78	6,108,135.23	8,516,606.26	9,109,029.38	9,222,156.36
2	**REVENUE:**														
3	PUMP CHARGES	9790	P6020901	725,825.90	123,574.42	16,147.94	25,446.70	52,388.37	31,042.51	8,667.97	40,202.30	204,250.66	92,238.86	41,442.75	90,423.42
4	SURCHARGES	9790	P6020903	1,052,864.40	34,464.25						9,166.86	1,006,345.47	0.10	2,758.48	129.24
5	INTEREST/ PENALTIES	9790	P6020904	99,331.22	2,624.31	4,151.14	1,550.00		8,433.83	8,100.00	10,723.44	49,454.96	5,283.43	2,744.40	6,265.71
6	GEMES RESERVE FEE	9790	P6020907	2,052,724.69	359,428.58	18,816.00	84,781.06	172,664.55	34,904.40	28,893.34	67,635.32	637,282.47	281,058.13	103,425.58	263,835.26
7	SUSTAINABILITY FEE	9790	P6020908	2,940,330.18	492,364.19	27,714.27	122,932.79	253,189.35	48,025.45	41,895.34	93,709.94	921,937.25	407,084.13	150,122.35	381,355.12
8	FCGMA TECH SERVICES -GRANT	9708	P6020852	46,472.00			46,472.00								
9	INTEREST EARNINGS	8911	-	134,362.40	(88,564.50)		44,282.25		44,282.25		40,103.81	40,103.81		27,077.39	27,077.39
10	GRANT REVENUE	9790	P6020872/6020874	2,577,800.00							2,541,830.03			35,969.97	
11	OTHER REV	9790	-	0.00											
12	**TOTAL REVENUE**			**9,629,710.79**	**923,891.25**	**66,829.35**	**325,464.80**	**478,242.27**	**166,688.44**	**87,556.65**	**2,803,371.70**	**2,859,374.62**	**785,664.65**	**363,540.92**	**769,086.14**
13	TOTAL FUNDS AVAILABLE			16,618,408.10	7,912,588.56	7,846,179.16	6,969,797.82	5,971,532.38	5,380,482.07	4,122,468.07	6,456,815.48	8,967,509.85	9,302,270.91	9,472,570.30	9,991,242.50
14	**EXPENDITURES:**														
15	***SUPPORT***														
16	PUBLIC WORKS CHARGES	2205	-	2,194,628.08	121,253.89	205,268.99	182,529.79	211,276.59	332,417.44	184,744.02	128,598.73	152,812.44	171,550.12	219,313.46	284,862.61
17	MANAGEMENT AND ADMIN SURVEY ISF	2199	P6020901	351,700.00				118,950.00		118,950.00		(62,050.00)		237,900.00	(62,050.00)
18	FCGMA ONLINE SUPPORT	2202	P6020850/70	88,986.00		11,666.00	3,989.00	5,663.17	13,080.99	10,140.69	10,302.10	12,875.29	10,239.44	4,181.07	6,848.25
19	BOARD MEMBERS INSURANCE	2072	P6020850	4,085.00	4,085.00										
20	BI-ANNUAL AUDIT	2199	P6020850	4,950.00			4,950.00								
21	WPD -SCR Coordinator	2199	P6020850	0.00											
22	***CONTRACT***														
23	CONSULTANT CONTRACT (DUDEK) - Implementation	2183	P6020858	577,745.29			122,414.64	108,002.39	189,199.93		163,613.33	(53,106.25)			47,621.25
24	CONSULTANT CONTRACT (DUDEK) - Annual reports	2183	P6020858	65,247.50					7,835.00		34,352.50				23,060.00
25	CONSULTING CONTRACT (UNITED WATER)-GSP modeling	2183	P6020858	0.00											
26	CONSULTING CONTRACT (RINCON CONSULTANT)- AMI Data support	2199	P6020852/70	36,627.04	4,355.21	5,920.79	2,365.11	7,814.89	4,311.52	2,208.15	9,651.37				
27	CONSULTING CONTRACT (HALLMARK)	2199	P6020850	15,879.31				5,164.34		3,714.97		2,562.50		4,437.50	
28	CONSULTING CONTRACT (PADRE ASSOCIATES)	2183	P6020872/74	3,795.00				1,897.50		1,897.50					
29	***LEGAL***														
30	COUNTY COUNSEL	2185	P6020853	101,829.00			11,534.25	23,955.75		12,285.00		29,961.75		13,377.00	10,715.25
31	COUNTY COUNSEL (GEMES) - LPV Basin Adjudication	2185	P6020864	(6,345.50)			2,934.75	2,320.50		1,160.25		2,798.25		(15,559.25)	
32	COUNTY COUNSEL (GEMES) - City of Oxnard v FCGMA	2185	P6020866	14,673.75			819.00	1,365.00		2,866.50		6,620.25		2,866.50	136.50
33	COUNTY COUNSEL (GEMES) - OPV Coalition v FCGMA	2185	P6020867	55,214.25			8,531.25	11,943.75		6,483.75		9,486.75		15,151.50	3,617.25
34	OTHER LEGAL FEES (Jarvis Fay)	2185	P6020850	1,976.00				1,976.00							
35	OTHER LEGAL FEES (Rutan & Tucker LLP)	2185	P6020853	11,573.50		11,573.50									
36	OTHER LEGAL FEES (Stoel)(GEMES) - LPV Basin Adjudication	2185	P6020864	(35,178.16)		8,134.20	26,165.00	94,508.48			112,875.60	91,100.86		(367,962.30)	
37	OTHER LEGAL FEES (Stoel)(GEMES) - City of Oxnard v FCGMA	2185	P6020866	291,862.50		44,163.52	70,954.51	78,846.71			54,172.14	40,198.26		3,445.53	81.83
38	OTHER LEGAL FEES (Stoel)(GEMES) - OPV Coalition v FCGMA	2185	P6020867	0.00											
39	OTHER LEGAL FEES (Shute Mihaly)(GEMES) - OPV Coalition v FCGMA	2185	P6020867	470,998.76		104,254.96	33,207.96	50,591.53	47,164.56	58,177.77	33,904.10	21,543.10		84,903.71	37,251.07
40	LEGAL EXPENSE COST SHARE - LPV WATERMASTER	2185	P6020853	(200,000.00)							(200,000.00)				
41	OTHER LEGAL FEES (Greines Martin Stein & Richland LLP) (GEMES) - City of Oxnard v FCGMA	2185	P6020866	30,737.00								4,930.00		25,807.00	
42	***GRANT***														
43	KENNEDY JENKS	2199	P6020852	98,735.00		6,492.50	9,452.50	29,867.50		18,747.50		19,712.50		9,300.00	5,162.50
44	WILDHERON DRILLING - FOX24-01 OXNARD BASIN MONIT WELLS	4114	P6020872	1,379,486.70		401,925.86	494,794.82		374,121.88	23,742.72		84,901.42			
45	WILDHERON DRILLING - FOX24-01 PV BASIN MONIT WELLS	4114	P6020874	1,379,486.67		401,925.85	494,794.80		374,121.87	23,742.72		84,901.43			
46	***GSA CHARGES***														
47	GRAPHICS CHARGES ISF	2166	P6020850	1,120.35								1,120.35			
48	GIS - ISF	2203	P6020850	1,655.28		300.96	150.48	150.48	150.48	150.48	150.48	150.48	150.48	150.48	150.48
49	SPECIAL SERVCES ISF	2206	P6020850	7,229.48			4,144.84		1,853.32		208.32	186.00			837.00
50	OTHER MAINTENANCE ISF	2116	P6020850	833.28				833.28							
51	VOICE DATA ISF	2032	P6020850	85.89					12.27	12.27	12.27	12.27	12.27	12.27	12.27
52	MAIL CENTER ISF	2164	P6020850	1,929.41							3.61		899.35	4.20	1,022.25
53	***SPECIAL***														
54	LAFCO FUNDING	2159	P6020850	3,510.00	3,510.00										
55	OXNARD WELL DESTRUCTION	2199	P6020854	0.00											
56	FRUIT GROWERS LAB - Annual GW Monit - Oxnard/ PV Basin Monit Wells	2199	P6020872/74	4,895.00			2,612.00	1,306.00	977.00						
57	RECRUITMENT - EXECUTIVE OFFICER	2199	P6020850	30,000.00									10,000.00	10,000.00	10,000.00
58	***OTHER***														
59	PUBLIC NOTICE	2221	various	1,111.00				855.07							255.93
60	CONFERENCES / SEMINARS	2273	P6020850	2,475.00										2,475.00	
61	PRINTING AND BINDING NON ISF	2162	P6020872/74	0.00											
62	HYDROLOGY SUPPLIES	2103	P6020852	383.00											383.00

PREPARED BY : Daiva Pekinas

A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P
	FCGMA FUND: O170 UNIT: 5795	**EXPENDITURES BY ACCOUNTING PERIOD**													
		OBJ	**PROGRAM**	**TOTAL**	**AP 01/ July**	**AP 02/ August**	**AP 03/ September**	**AP 04/ October**	**AP 05/ November**	**AP 06/ December**	**AP 07/ January**	**AP 08/ February**	**AP 09/ March**	**AP 10/ April**	**AP 11/ May**
63	MAINTENANCE SUPPLIES AND PARTS	2104	P6020872/74	453.35				286.81				53.59	112.95		
64	SOFTWARE SUBSCRIPTIONS NON ISF (ZOOM)	2236	P6020850	1,373.25		163.01	163.01	163.01	163.01		325.79	97.61	99.27	99.27	99.27
65	MISC OFFICE EXPENSE	2169/79	P6020850	1,335.40	34.65	56.00			161.38		179.91	54.12	177.65	511.00	160.69
66	ASSN OF WATER AGENCIES	2159	P6020850	310.62							330.00	(19.38)			
67	**TOTAL EXPENDITURES**			**6,997,393.00**	**133,238.75**	**1,201,846.14**	**1,476,507.71**	**757,738.75**	**1,345,570.65**	**469,024.29**	**348,680.25**	**450,903.59**	**193,241.53**	**250,413.94**	**370,227.40**
68	TOTAL REVENUE			9,629,710.79	923,891.25	66,829.35	325,464.80	478,242.27	166,688.44	87,556.65	2,803,371.70	2,859,374.62	785,664.65	363,540.92	769,086.14
69	**ENDING CASH BALANCE**			**9,621,015.10**	**7,779,349.81**	**6,644,333.02**	**5,493,290.11**	**5,213,793.63**	**4,034,911.42**	**3,653,443.78**	**6,108,135.23**	**8,516,606.26**	**9,109,029.38**	**9,222,156.36**	**9,621,015.10**
70	**NOTES:**														
	Revenues increased by a total of $405,545.22 (111.6%) in May (AP11) from April (AP10) as the SAES-2025-1 were due by 05/16/2025. In addition, there was a $27,077.39 Interest earnings allocation from the County Pooled Investment fund in May.														
	Expenses were higher by $119,813.46 (47.8%) in May (AP11); the contributing factor was a significant reduction in legal fees last month ($367,962.30 Stoel Rives LPV Water Rights fees and $15,559.25 County Counsel LPV Basin Adjudication fees were allocated from FCGMA to LPV Watermaster in April). Peckham & McKenney's retainer invoice #3 $10,000 for the Executive Officer recruitment and Dudek's $70,681.25 invoices for technical services in January, February, and March also contributed to the increase in May expenses.														

FCGMA Board Meeting, 6/25/2025
Item 9 - LPV Watermaster Monthly Balance Report, as of May 2025

PREPARED BY : Daiva Pekinas

A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q
1	**FUND: O171 UNIT: 5796**	**2024-25**	ACCUMULATED			EXPENDITURES BY ACCOUNTING PERIOD										
2	**LPV WATERMASTER**	**ADOPTED**	**OBJ**	**PROG**	**TOTAL**	**AP 01 /July**	**AP 02 / August**	**AP 03 / September**	**AP 04 / October**	**AP 05 / November**	**AP 06 / December**	**AP 07 / January**	**AP 08 / February**	**AP 09 / March**	**AP 10 / April**	**AP 11 / May**
3		**BUDGET**				7/23/2024	8/23/2024	9/23/2024	10/23/2024	11/23/2024	12/23/2024	1/24/2024	2/24/2024	3/24/2024	4/24/2024	5/24/2024
4	CASH BALANCE				**1,127,504.76**	1,127,504.76	1,050,837.78	1,076,742.91	1,074,025.08	1,386,410.44	1,412,842.35	1,438,769.91	1,630,339.40	1,581,858.19	1,596,875.88	1,383,007.76
5	**REVENUE:**															
6	INTEREST EARNINGS		8911	-	27,334.50	(9,651.42)		4,825.71		4,825.71		6,167.29	6,167.29		7,499.96	7,499.96
7	BASIN ASSESSMENT FEE		9790	P6020670	1,813,197.34	(54,626.98)	38,593.60	15,837.76	403,185.65	85,301.81	70,356.86	413,527.98	175,356.97	74,724.88	330,457.46	260,481.35
8	BASIN ASSESSMENT INTEREST		9790	P6020671	22,874.75	2,102.43	2,775.68	2,584.16	112.55		1,232.84	7,474.87	92.72	3,598.70	1,496.46	1,404.34
9																
10	**TOTAL REVENUE**				**1,863,406.59**	**(62,175.97)**	**41,369.28**	**23,247.63**	**403,298.20**	**90,127.52**	**71,589.70**	**427,170.14**	**181,616.98**	**78,323.58**	**339,453.88**	**269,385.65**
11																
12	**TOTAL FUNDS AVAILABLE**				2,990,911.35	1,065,328.79	1,092,207.06	1,099,990.54	1,477,323.28	1,476,537.96	1,484,432.05	1,865,940.05	1,811,956.38	1,660,181.77	1,936,329.76	1,652,393.41
13	**EXPENDITURES:**															
14	***SUPPORT:***															
15	PUBLIC WORKS ISF CHARGES - LPV WATERMASTER ADMINISTRATION	106,848	2205	P6020660	114,223.86	14,491.01	5,228.90	1,925.09	7,698.49	26,921.33	8,029.70	13,126.12	9,707.36	10,807.75	8,366.84	7,921.27
16	PUBLIC WORKS ISF CHARGES - LPV ALLOCATIONS & RECORD KEEPING	217,088	2205	P6020661	51,482.85		1,535.70	332.74	3,187.43	8,854.35	2,797.47		8,879.70	7,760.64	8,768.38	9,366.44
17	PUBLIC WORKS ISF CHARGES - LPV BASIN MANAGEMENT	156,880	2205	P6020662	45,811.46		1,319.55		3,126.10	6,132.81	3,981.92	5,926.28	3,736.60	6,128.78	5,956.09	9,503.33
18	PUBLIC WORKS ISF CHARGES - LPV COMMITTEE COORDINATION AND CONSULTATIONS	71,232	2205	P6020663	29,010.57		2,608.50	1,187.44	2,770.72	6,966.06	3,760.25	1,979.08	3,023.26	2,514.18	1,038.47	3,162.61
19	PUBLIC WORKS ISF CHARGES - LPV BUDGET & ASSESSMENTS	136,528	2205	P6020664	29,198.79				1,510.97	2,789.73	569.63	1,367.91	2,988.88	12,337.08	5,885.54	1,749.05
20	PUBLIC WORKS ISF CHARGES - LPV LEGAL SERVICES	-	2205	P6020666	1,375.75										359.94	1,015.81
21	PUBLIC WORKS ISF CHARGES - LPV IT SERVICE & SUPPORT	40,704	2205	P6020667	16,934.23			79.68	4,727.78	4,605.03	3,085.77	1,905.76	362.47	417.11	1,393.94	356.69
22	PUBLIC WORKS CHARGES - LPV IT SERVICE & SUPPORT (CSD IT)	200,000	2199	P6020667	90,200.00								45,100.00			45,100.00
23	PUBLIC WORKS CHARGES - FISCAL SUPPORT	-	2199	P6020664	33,900.00								16,950.00			16,950.00
24	LPV CALLEGUAS ASR PROJECT OPERATIONS STUDY	81,408	2205	P6020665	791.64											791.64
25	***LEGAL:***															
26	LPV LEGAL SERVICES - COUNTY COUNSEL	248,640	2185	P6020666	152,468.75			10,647.00	25,184.25		9,213.75		41,769.00		48,319.25	17,335.50
27	LPV LEGAL SERVICES - FCGMA LEGAL COST SHARE	200,000	2185	P6020666	200,000.00							200,000.00				
28	LPV LEGAL SERVICES - STOEL RIVES		2185	P6020666	450,253.23										450,253.23	
29	***CONTRACTS:***															
30	RGS AUTHORITY	20,000	2199	P6020661	27,428.42		4,771.50	1,602.26	1,520.35	3,052.30	4,577.40		5,389.17		203.67	6,311.77
31	TODD GROUNDWATER-TAC		2199	P6020663	74,117.50			10,191.25	18,152.50		8,853.75	1,416.25	19,121.25		13,206.25	3,176.25
32	AQUILOGIC-TAC	259,200	2199	P6020663	30,255.00				11,860.00	570.00		3,460.00	10,375.00	2,660.00		1,330.00
33	DANIEL B STEPHENS & ASSOCIATES-TAC		2199	P6020663	26,945.00				11,174.25	1,426.50		3,724.75	9,589.25	1,030.25		
34	DANIEL B STEPHENS & ASSOCIATES-PAC	170,000	2199	P6020663	19,812.50					2,377.50	792.50	2,694.50		11,570.50		2,377.50
35	DUDEK (GSP Update Task 10.2.1 - Committee Review & Response, Periodic Evaluation)	43,440	2183	P6020662	6,578.75								6,578.75			
36	DUDEK (Initial Basin Optimization Plan - Tasks 12.5 - 12.7)	78,000	2183	P6020662	57,740.00								19,398.75			38,341.25
37	DUDEK (Task 13 - Technical Advisory Committee Watermaster Support Services)	97,440	2183	P6020663	61,236.25								27,128.75			34,107.50
38	***AUDITS:***															
39	BROWN ARMSTRONG ACCOUNTANCY CORP	20,000	2199	P6020664	17,650.00									8,079.60	9,570.40	
40	**TOTAL EXPENDITURES**				**1,537,414.55**	**14,491.01**	**15,464.15**	**25,965.46**	**90,912.84**	**63,695.61**	**45,662.14**	**235,600.65**	**230,098.19**	**63,305.89**	**553,322.00**	**198,896.61**
41	**ENDING CASH BALANCE**				**1,453,496.80**	**1,050,837.78**	**1,076,742.91**	**1,074,025.08**	**1,386,410.44**	**1,412,842.35**	**1,438,769.91**	**1,630,339.40**	**1,581,858.19**	**1,596,875.88**	**1,383,007.76**	**1,453,496.80**
42	**NOTES:**															
	In May (AP11, or column Q), revenue decreased by $70,068.23 (20.4%) compared to April as the LPV-2024-3 Basin Assessment (BA) payments are continuing; the BA due date was 05/01/2025. In addition, there was a $7,499.96 interest earnings allocation from the County Pooled Investment fund in May.															
	Total expenses decreased by $354,425.39 (64.1%) from April. The significant decrease ocurred in legal fees since the allocation of $367,962.30 Stoel Rives in LPV counsel fees and $15,559.25 County Counsel in LPV Basin Adjudication fees from FCGMA to LPV Watermaster was processed in April. PWA Central Services allocation for Fiscal and IT support for the 3rd & 4th quarters of the Fiscal Year was processed in May.															

June 25, 2025

Board of Directors
Fox Canyon Groundwater Management Agency
800 South Victoria Avenue
Ventura, CA 93009-1600

SUBJECT: Adopt Proposed Resolution No. 2025-03 to Establish the Amount of the Las Posas Valley Overuse Assessment on the Use of Groundwater in Excess of What the Las Posas Valley Adjudication Judgment Allows [LPV Watermaster] – *(New Item)*

RECOMMENDATIONS: (1) Receive an Agency staff presentation on the Las Posas Valley (LPV) Overuse Assessment establishing the amount (or rate) of the Overuse Assessment; and **(2)** Adopt Resolution No. 2025-03 establishing the amount of the Overuse Assessment on groundwater use in excess of what's allowed under the LPV Adjudication Judgment equal to the prevailing Calleguas Municipal Water District's Tier 1 rate at the end of the cure period Water Year 2024, setting the interest rate on delinquent Overuse Assessments equal to the current real property tax delinquency rate for Ventura County, and directing staff to deposit Overuse Assessments collected from water right holders in the separate Watermaster Overuse Assessment account.

BACKGROUND:
The Las Posas Valley Adjudication Judgment (Judgment) defines "Overuse" as "a Use in Excess of that allowed under the Judgment." (Judgment, §4.15.1) Generally, Overuse occurs when a Water Right Holder Uses groundwater in excess of their Annual Allocation. Annual Allocations are determined for each Water Year by Watermaster following Committee Consultation pursuant to the protocols and formulas set forth in the Judgment. (See Judgment, § 4.2.) In addition, Overuse may occur where a Mutual Water Company reports an aggregate amount of Use on behalf of its Mutual Exclusive Shareholders that exceeds the Aggregate Mutual Supply, and where a Mutual Water Company Shareholder without an Annual Allocation Uses Groundwater. (See Judgment, § 4.15.1.1, 4.15.1.2.) Prior to a Party being assessed an Overuse Assessment, the Judgment provides Water Right Holders several options to cure the Overuse "in the Water Year [immediately] following the Water Year in which the Overuse occur[s]." (Judgment, § 4.15.2.) However, if a Water Right Holder fails to cure the Overuse as provided in the Judgment, then the Water Right Holder, Party, or Person shall be subject to an Overuse Assessment and/or injunctive relief, as the case may be. (Ibid.) "Failure to pay [an] Overuse Assessment will

incur interest on the amount owed and further enforcement [],” as well as additional enforcement including injunctive relief and liening the associated real property for unpaid Overuse Assessments. (Judgment, § 4.15.3.)

The Judgment requires Watermaster, with Committee Consultation, to establish the amount of the Overuse Assessment. (Judgment, § 4.15.3.) To date, Watermaster has not established the amount or rate of the Overuse Assessment.

DISCUSSION:
Water Use during Water Year 2023 (Oct. 1, 2023 – Sept. 30, 2024) was the first Water Year that Water Right Holders reported their Groundwater Use to Watermaster, and thus was the first Water Year for which Overuse was determined. In order to avoid paying an Overuse Assessment for Overuse that accrued during Water Year 2023, Water Right Holders must cure Overuse during Water Year 2024 (Oct. 1, 2024 – Sept. 30, 2025). The Judgment provides several ways to cure an Overuse, each of which generally involves the Water Right Holder Using less Groundwater than their Annual Allocation during the cure period or obtaining additional Annual Allocation through the Judgment’s transfer processes. (Judgment, § 4.15.2.) Failure to cure any Overuse in the Water Year after it accrues will result in Overuse Assessments.

In compliance with the provisions of the Judgment to establish an Overuse Assessment, Watermaster submitted a request for consultation and policy recommendations to the Las Posas Valley Policy Advisory Committee (PAC) in a memo dated April 10, 2025 (Item 10A). The PAC deliberated on the issue at a regular meeting on April 17, 2025, and provided a Recommendation Report to Watermaster dated May 01, 2025 (Item 10B). The PAC recommended Watermaster establish an Overuse Assessment that meets the criteria summarized below:

1. The Overuse Assessment be charged at the prevailing Calleguas Tier 1 rate at the end of the Water Year.

2. Overuse Assessments, once collected, be sequestered in a separate Watermaster account reserved for replenishment.

The Judgment’s creation of the Overuse Assessment, as well as the authorities to collect associated interest charges and to take additional enforcement options for nonpayment (i.e., injunctive relief, liening Water Right Holders’ underlying real property) (Judgment, § 4.15.3), is intended to encourage Groundwater Use according to the Annual Allocations set by the Watermaster and discourage Overuse. Historically, the Agency has set the rate of surcharges to be collected for groundwater extractions in excess of allocations established under its allocation ordinances according to the prevailing Calleguas Municipal Water District’s (CMWD) Tier 2 Supply Rate. However, CMWD no longer has a Tier 2 rate, only a Tier 1 rate. CMWD is a member agency of Metropolitan Water District and is the largest purveyor of imported water within the Agency. CMWD’s Tier 1 Supply Rate is “set at Metropolitan’s cost of maintaining a reliable amount of supply.” The 2025 CMWD Adopted Water Rates (attached as Item 10C) shows Tier 1 Supply Rate is $1,895 per acre-foot.

Staff agree with the PAC recommendations. However, staff further propose (1) that Overuse Assessments be charged at the prevailing Calleguas Tier 1 rate at the end of the cure period, (2) Overuse Assessments become delinquent and accrue interest beginning one month after they are due; and (3) delinquent Overuse Assessments bear interest at the then current real property tax delinquency rate for Ventura County similar to the Delinquent Basin Assessments (Judgment, Exhibit A, § 2.8.2). Proposed Resolution No. 2025-03 (attached as Item 10D) would automatically adjust the Overuse Assessments, consistent with the increase in the CMWD Tier 1.

On June 13, 2025, Watermaster received correspondence from Michele Staples, whose law firm Jackson Tidus represents the defendants and intervenors that either did not receive a water under or are challenging the water rights they received under the Judgment, and recently sought to amend the Judgment. (Item 10E.) Ms. Staples' letter requested that this Item and the attached proposed resolution be amended to clarify that the Overuse Assessment does not apply to those defendants and intervenors because they intend to appeal the trial court's May 2025 decision denying their requested relief and granting some of them only nominal Water Right Allocations for their domestic use. This item and the attached resolution do not involve the applicability of Overuse Assessments. The applicability and obligation to pay an Overuse Assessment is set by the Judgment, not the Watermaster. (See Judgment, § 4.15.2.1 ["In the case of Overuse by a Party that reports its own Groundwater Use, [i]f a Party's Overuse is not so cured within the one-year cure period, the Party will be assessed an Overuse Assessment"]; see also Judgment, §§ 4.15.2.2, 4.15.2.3.) Nor does this item or adoption of the attached resolution amount to Watermaster levying any Overuse Assessment. As described above, the levying of Overuse Assessments will be approved after Watermaster determines which Water Right Holders use of groundwater resulted in an Overuse following the expiration of the applicable cure period. (Judgment, § 4.15.2.) Here, the recommended action involves only establishing the amount, or rate, of the Overuse Assessment that will be levied in the future once Watermaster determines the Overuse of Water Right Holders, if any. It does not involve the levying of an Overuse Assessment on any Party or Water Right Holder.

CONCLUSION:
Agency staff recommends your Board (1) receive a presentation on Overuse, the Overuse Assessment, and establishing the amount (or rate) of the Overuse Assessment under the LPV Adjudication Judgment; and (2) adopt proposed Resolution No. 2025-03 establishing the amount of the Overuse Assessment as a per acre-foot amount equal to Calleguas Municipal Water District's Tier 1 Water Supply rate; establishing that Overuse Assessments are delinquent and begin accruing interest a month after they are due; setting the rate of interest for delinquent Overuse Assessments at an amount equal to the current real property tax delinquency rate for Ventura County; and directing staff to deposit Overuse Assessments into the Watermaster Overuse Assessment account to be used in the LPV Basin as directed by the Agency Board of Directors.

This letter has been reviewed by Agency Counsel. If you have any questions, please call me at (805) 654-3942.

Sincerely,

Kudzai Farai Kaseke (Ph.D., PH, PMP, CSM)
Assistant Groundwater Manager

Attachments:

Exhibit 10A – Watermaster PAC Consultation Request, April 10, 2025
Exhibit 10B – PAC Recommendation Report, May 01, 2025
Exhibit 10C – Calleguas MWD 2025 Adopted Water Rates
Exhibit 10D – Proposed Resolution No. 2025-03
Exhibit 10E – Correspondence from Jackson Tidus dated June 13, 2025

FOX CANYON GROUNDWATER MANAGEMENT AGENCY
LAS POSAS VALLEY WATERMASTER

MEMORANDUM

Date: **April 10, 2025**

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

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

Subject: **Committee Consultation for Establishment of an Overuse Assessment for Las Posas Valley Basin.**

Dear Las Posas Valley Watermaster Policy Advisory Committee (PAC):

The Las Posas Valley Adjudication Judgment (Judgment) defines "Overuse" as "a Use in Excess of that allowed under the Judgment." (Judgment, §4.15.1) Generally, Overuse occurs when a Water Right Holder Uses Groundwater in excess of Annual Allocation; Annual Allocations are determined for each Water Year by Watermaster according to the Annual Allocation Calculation process set forth Exhibit D of the Judgment. (See also Judgment, § 4.2.) More specifically, the Judgment provides that Overuse occurs where

> Use of Groundwater by a Party other than Calleguas that is not a Mutual Exclusive Shareholder (unless that Mutual Shareholder and its Mutual Water Company have agreed to the separate reporting of said Mutual Exclusive Shareholder's Groundwater Use pursuant to Section 4.7.1) that either has no Annual Allocation or exceeds such Party's Annual Allocation (inclusive of Annual Allocation derived from Transferred Allocation Basis or Carryover), any Carryover, and any Groundwater to which such Party is entitled pursuant to a Subscription Project" or "The aggregate Use of Allocated Groundwater by a Mutual Water Company's Mutual Exclusive Shareholders (excluding those Mutual Exclusive Shareholders who have agreed with their Mutual Water Company to separately report their Groundwater Use pursuant to section 4.7.1) exceeds the Aggregate Mutual Supply.

(Judgement, §§ 4.15.1.1, 4.15.1.2.) The Judgment provides Water Right Holders several options to cure Overuse "in the Water Year [immediately] following the Water Year in which the Overuse occur[s]." (Judgment, § 4.15.2.) However, if a Water Right Holder fails to cure the Overuse as provided in the Judgment, then the Water Right Holder, Party, or Person shall be subject to an Overuse Assessment and/or injunctive relief, as the case may be. (Ibid.) "Failure to pay [an] Overuse Assessment will incur interest on the amount owed and further enforcement []," as well as additional enforcement including injunctive relief and liening the associated real property for unpaid Overuse Assessments. (Judgment, § 4.15.3.)

The Judgment requires Watermaster, with Committee Consultation, to establish the amount of the Overuse Assessment. (Judgment, § 4.15.3.) To date, Watermaster has not established the amount or rate of the Overuse Assessment. In compliance with the Judgment, Watermaster requests your Committee's consultation and policy recommendations on Watermaster's establishment of the Overuse Assessment, specifically the amount of the Overuse Assessment. Watermaster staff plan to bring an item and

recommendation on the amount of the Overuse Assessment to the Fox Canyon Groundwater Management Agency Board of Directors (acting as the Watermaster Board) at the May 28, 2025, meeting. Please provide feedback via the email below to the Watermaster by May 09, 2025.

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

TO: Las Posas Valley Watermaster

FROM: Las Posas Valley Watermaster Policy Advisory Committee

RE: Recommendation Report – Establishment of an Overuse Assessment for Las Posas Valley Basin DATE: May 1, 2025

The Las Posas Valley Watermaster Policy Advisory Committee (PAC) provides this Recommendation Report on the **Establishment of an Overuse Assessment for Las Posas Valley Basin**.

Recommendation:
See memo below for recommendation.

Policy Rationale for Recommendation:
See memo below for rationale.

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

Tally of Committee Member Votes:

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

Report of Bases for Majority and Minority Committee Member Positions:

PAC Recommendation Report Regarding Establishment of an Overuse Assessment for Las Posas Valley Basin

On April 10, 2025, Watermaster sent the Las Posas Valley Basin Watermaster Policy Advisory Committee (PAC) a committee consultation for the establishment of an "Overuse Assessment," as defined in Section 1.79 of the Judgment, for Las Posas Valley Basin. The PAC discussed this issue at its regular meeting on April 17, 2025.

By unanimous vote of those present, the PAC recommends that the Watermaster establish an Overuse Assessment that meets the following criteria:

- The Overuse Assessment shall be charged at the prevailing Calleguas Tier 1 rate at the end of the Water Year. Calleguas updates its rates annually and posts them on the Calleguas website, https://www.calleguas.com.

- Overuse Assessments, once collected, shall be sequestered in a separate Watermaster account reserved for replenishment.

Calleguas MWD

2025 Adopted Water Rates

	Effective Jan 1, 2024	Effective Jan 1, 2025	% Change
MWD Rates			
Tier 1 Supply Rate ($/AF)	$332	$290	(12.7%)
System Access Rate ($/AF)	$389	$463	19.0%
System Power Rate ($/AF)	$182	$159	(12.6%)
Treatment Surcharge ($/AF)	$353	$483	36.8%
MWD Treated Water Rates			
MWD Tier 1 ($/AF)	$1,256	$1,395	11.1%
CMWD Rates			
O&M Surcharge ($/AF)	$202	$214	5.9%
Capital Construction Surcharge ($/AF)	$272	$286	5.1%
Total Calleguas Rates	$474	$500	5.5%
Combined MWD & CMWD Rates			
Tier 1 Rate ($/AF)	**$1,730**	**$1,895**	9.5%
Temporary Water Rate (per 100 cu ft)	**$8.86**	**$8.70**	(1.8%)
Capacity Charge			
Estimated MWD Capacity Charge	$ 2,123,520	$ 2,464,800	16.1%
CMWD Capacity Charge Requirement	$ 5,615,216	$ 5,508,644	(1.9%)
Estimated MWD & CMWD Capacity Charge	**$7,738,736**	**$7,973,444**	3.03%
Estimated Purveyor CFS	134.92	143.74	6.5%
Capacity Charge /cfs - MWD	$15,739	$17,148	
Capacity Charge /cfs - CMWD	$41,619	$38,324	
Combined MWD & CMWD Capacity Charge	**$57,358**	**$55,472**	**(3.3%)**
RTS Charge			
Estimated MWD RTS Charge	**$ 8,358,310**	**$ 9,096,290**	8.8%

AF of Sales to calculate Capacity Chg & RTS Rate	73,000	73,000

	2024	2025	% Chg
MWD Per AF Rate	$ 1,256	$ 1,395	
MWD Capacity Charge	$ 29	$ 34	
MWD RTS	$ 114	$ 125	
	$ 1,399	$ 1,554	11.1%
CMWD Per AF Rate	$ 474	$ 500	
CMWD Capacity Charge	$ 77	$ 75	
	$ 551	$ 575	4.4%
Total MWD & CMWD Combined Rates	**$ 1,950**	**$ 2,129**	**9.18%**

Calleguas MWD

2025 Adopted SMP & Wheeling Rates

	Effective Jan 1, 2024	Effective Jan 1, 2025	% Change
Current SMP rate ($/AF)			
Brine	$683.90	$749.10	9.5%
Non-Brine	$54.80	$60.00	9.5%
Outside District SMP rate ($/AF)			
Brine	$1,025.90	$1,123.70	9.5%
Non-Brine	$82.20	$90.00	9.5%
Wheeling Rate ($/AF)	$27.20	$29.39	8.1%

DEFINITIONS:

Tier 1 Supply Rate (Metropolitan) - recovers the of cost of maintaining a reliable amount of supply.

System Access Rate (Metropolitan) – recovers a portion of the costs associated with the delivery of supplies.

System Power Rate (Metropolitan) – recovers power costs for pumping supplies to Southern California.

Water Stewardship Rate (Metropolitan) – recovers the cost of Metropolitan's financial commitment to conservation, water recycling, groundwater clean-up and other local resource management programs.

Treatment Surcharge (Metropolitan) – recovers the costs of treating imported water.

Readiness-to-Serve Charge (Metropolitan) **-** a fixed charge that recovers the capital cost of the portion of system capacity that is on standby to provide emergency service and operational flexibility. Based upon a calendar ten year rolling average.

Capacity Charge (Metropolitan) - recovers the cost of the assets that are providing peak capacity within the distribution system. Based on peak day delivery in previous three years.

Operations and Maintenance Surcharge (Calleguas) - recovers the cost of operating and maintaining system facilities and District administrative functions.

Capital Construction Surcharge (Calleguas) - recovers a portion of the cost of infrastructure expansion to accommodate new demand and increase system reliability.

Capacity Charge (Calleguas) recovers the cost of infrastructure to meet peaking and emergency demands. Based on the peak week demand on the system between May 1 and September 30, for the prior calendar year

Resolution 2025-03

A RESOLUTION OF THE FOX CANYON GROUNDWATER MANAGEMENT AGENCY BOARD OF DIRECTORS ESTABLISHING THE AMOUNT OF THE OVERUSE ASSESSMENT ON EXCESS GROUNWATER USE IN THE ADJUDICATED LAS POSAS VALLEY BASIN

WHEREAS, the Fox Canyon Groundwater Management Agency (Agency) is a groundwater management agency created by special act of the Legislature to preserve and protect the groundwater resources within the Agency boundaries; and

WHEREAS, the Agency is the exclusive groundwater sustainability agency for the basins within the Agency's boundaries under the Sustainable Groundwater Management Act (SGMA); and

WHEREAS, on July 10, 2023, the Santa Barbara Superior Court entered a final judgment in *Las Posas Valley Water Rights Coalition, et al. v. Fox Canyon Groundwater Management Agency, et al.*, Santa Barbara Sup. Ct. Case No. VENC100509700 (LPV Adjudication Judgment); and

WHEREAS, the LPV Adjudication Judgment, among other things, determines and adjudicates all groundwater rights within the Las Posas Valley Groundwater Basin (LPV Basin) and establishes and implements a Physical Solution for the LPV Basin; and

WHEREAS, the LPV Adjudication Judgment appoints the Agency to serve as Watermaster for the LPV Basin to assist the court with administering and implementing the LPV Adjudication Judgment and Physical Solution, including regulating groundwater extraction and use according to adjudicated water rights and providing for sustainable groundwater management of the LPV Basin; and

WHEREAS, Section 4.15.3 of the LPV Adjudication Judgment requires the Agency, acting as Watermaster and following committee consultation, to establish the amount of an "Overuse Assessment," which is the fee charged to water right holders for the use of groundwater in excess of that allowed under the LPV Adjudication Judgment and not otherwise cured during the applicable cure period provided in the LPV Adjudication Judgment; and

WHEREAS, Section 2.8.2 of Exhibit A ("Watermaster Rules") of the LPV Adjudication Judgment provides that assessments, including the Overuse Assessment, become delinquent one month after they are due and "shall bear interest at the then current real property tax delinquency rate for Ventura County"; and

WHEREAS, on May 10, 2025, the Las Posas Valley Policy Advisory Committee released a report recommending that the amount or rate of the Overuse Assessment be established "at the prevailing Calleguas [Municipal Water District] Tier 1 [water] rate"

and Overuse Assessments "be sequestered in a separate Watermaster account reserved for replenishment"; and

WHEREAS, the Agency has historically set the amount of surcharges for extractions that exceeded the allocations established under the Agency's ordinances commensurate with the Calleguas Municipal District (CMWD) water rates, which CMWD updates annually based on, among other things, the cost of purchasing water from the Metropolitan Water District of Southern California; and,

WHEREAS, the Agency, acting as Watermaster, has established a separate sub-account within its Las Posas Valley Watermaster Fund entitled "Watermaster Overuse Assessment Account" for the deposit of Overuse Assessments collected by Watermaster; and

WHEREAS, at the June 13, 2025, Fox Canyon Groundwater Management Agency special meeting, the Board of Directors received presentations and comments on establishing the amount of the Overuse Assessment commensurate with the CMWD Tier 1 water rates, charging interest on delinquent Overuse Assessments according to the current real property tax delinquency rate for Ventura County; and depositing Overuse Assessments collected by Watermaster in specified accounts; and,

WHEREAS, this Resolution is exempt from the provisions of the California Environmental Quality Act as an action taken to assure the maintenance, restoration, or enhancement of a natural resource and the environment and pursuant to Section 10.7 of the LPV Adjudication Judgment.

NOW, THEREFORE, IT IS HEREBY RESOLVED AND ORDERED BY THE FOX CANYON GROUNDWATER MANAGEMENT AGENCY BOARD OF DIRECTORS THAT:

1. The amount (rate) of the Overuse Assessment is equal to the prevailing "per acre foot" amount for Calleguas Municipal Water District (CMWD) Tier I water.

2. The amount of the Overuse Assessment shall adjust automatically anytime that CMWD adjusts its "per acre foot" amount for CMWD Tier 1 water so that the amount of the Overuse Assessment is always equal to the "per acre foot" amount of CMWD Tier 1 water then in effect.

3. Overuse Assessments become delinquent one month after they are due and shall bear interest at the then-current real property tax delinquency rate for the County of Ventura.

4. Overuse Assessments shall be collected and deposited in the Agency's "Watermaster Overuse Assessment Account" and used for LPV Adjudication Judgment purposes as approved by the Agency Board of Directors.

5. The amount of the Overuse Assessment shall become effective on July 1, 2025.

On a motion by Director _____and seconded by Director _____, the foregoing Resolution was duly passed and adopted by the Board of Directors at a special meeting of the Board held on this 25th day of June 2025, in Ventura, California.

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

ATTEST: I hereby certify that the above is a true and correct copy of Resolution No. 2025-03.

By: _____
Elka Weber, Clerk of the Board

Jackson Tidus
A LAW CORPORATION

June 13, 2025

Direct Dial: 949.851.7409
Email: mstaples@jacksontidus.law
Reply to: Irvine Office
File No: 10547-128970

VIA EMAIL ONLY (LPV.Watermaster@ventura.org; fcgma@ventura.org)

Policy Advisory Committee
LPV Watermaster
c/o Fox Canyon Groundwater Management Agency
800 South Victoria Avenue L#1610
Ventura, CA. 93009-1610

Board of Directors
Fox Canyon Groundwater Management Agency
Las Posas Valley Watermaster
800 South Victoria Avenue L#1610
Ventura, CA. 93009-1610

Re: June 13, 2025 Agenda Item No. 18, Request for Clarification that Resolution 2025-03 Overuse Assessment Will Not Apply to Omitted Rights Holders

Dear Members of the Public Advisory Committee and Board of Directors:

Our firm represents small farmers and landowners overlying the Las Posas Valley ("LPV") Basin who have long used groundwater pumped from the LPV Basin for domestic and agricultural purposes, regularly reported their groundwater extractions and paid their assessments to Fox Canyon Groundwater Management Agency ("FCGMA"), but nevertheless did not receive Allocations under the Judgment. (See previous correspondence to the Watermaster on this matter, attached.) This letter refers to our clients as "Omitted Rights Holders".

The Watermaster's proposed Resolution No. 2025-03 would establish an "Overuse Assessment". The last-minute noticing of the Board's consideration of Resolution No. 2025-03 at a special meeting does not give sufficient time for the Omitted Rights Holders and others similarly situated to adequately review and comment on the proposed resolution, and deprives them of their due process rights under the California and federal constitutions. ***We ask the Board to continue this agenda item to a regularly scheduled Board meeting, and to provide sufficient advance notice to enable adequate time for public review and comment***.

Resolution 2025-03 defines the proposed "Overuse Assessment" as "the fee charged to water right holders for the use of groundwater in excess of that allowed under the LPV Adjudication Judgment, following committee consultation". (Resolution 2025-03, p. 1 (Agenda Packet p. 181 of 192).) The Overuse Assessment should not be applied to the Omitted Rights Holders because they are not Water Right Holders as defined by Judgment section 1.111 ("Water Right Holder – A Party that holds an Allocation") and because they are appealing the trial court's ruling denying their motions to establish Allocations.

Applying the Overuse Assessment to all of the Omitted Rights Holders' groundwater pumping would make their historic water use economically infeasible and they would suffer irreparable harm that cannot be remedied if they win their appeal (which they are likely to do), including the complete loss of their crops, the loss of productive use of their land, and for many of them, loss of their livelihoods. The loss of crop trees, loss of harvest, and loss of agricultural use of their land and water rights would directly contradict state and local laws that protect small farmers, agricultural crops and agricultural land uses, including the SOAR initiative (Save Open Space and Agricultural Resources) that restricts many of the Omitted Rights Holders' properties to agricultural use. On the other hand, it does little harm to allow them to continue their historic groundwater production while they pursue the appeal and pay the ordinary course of water assessment fees.

For the avoidance of confusion, we ask the Watermaster Board to clarify that the Overuse Assessment established under Resolution 2025-03 does not apply to Omitted Rights Holders.

As we previously notified Watermaster, the Omitted Rights Holders were not served with the court-approved notice of the LPV Adjudication. They were denied a meaningful opportunity to participate in the adjudication, their exercised overlying water rights were overlooked in the Judgment, and they were stripped of their groundwater allocations without their knowledge. The Watermaster took part in the recent court proceedings on our motions to modify the Judgment that detailed the numerous violations of the California and federal constitutions, Streamlined Adjudication Act, Sustainable Groundwater Management Act and California Code of Civil Procedure, and the irregularities in the adjudication proceedings that led to the Judgment wrongly excluding our clients' exercised overlying water rights. These violations and irregularities include things like irregular certified mail receipts of the Court-approved adjudication notice (unsigned delivery receipts, receipts for different Omitted Rights Holders having identical "signatures" and identical delivery dates and times) and inadmissible hearsay declarations by the service administrator for the adjudication about how the certified mailing was carried out, even though the service administrator did not carry out the mailing but instead hired a contractor that was not disclosed to the Court or the parties during the adjudication and did not submit any declaration by the contractor confirming the certified mailing. The trial court denied our motions and the case is now headed for appeal.

Also, the Watermaster's Policy Advisory Committee ("PAC") has not yet considered or advised the Board on any assessment or other policy that should apply to overlying groundwater users such as the Omitted Rights Holders who historically extracted groundwater in compliance with FCGMA allocations, reported and paid for their groundwater use, yet received no Allocations under the Judgment. Rather, the PAC discussions have addressed applying the Overuse Assessments only to pumpers having Allocations under the Judgment who pump in excess of those Allocations. Debra Tash, Daryl Smith and Doug Homze are among the Omitted Rights Holders who have previously asked that the PAC consider the predicament of groundwater users in their position and advise on their continued use of overlying groundwater rights for domestic and agricultural purposes as

necessary to spare their crops, continue productive use of their land and make a living. But the matter has not yet been included on a PAC agenda.

There is not yet any established water market, Basin Optimization Projects, or any other feasible way for Omitted Rights Holders to secure any Allocation in the LPV Basin other than to pursue amendment of the Judgment as they are doing. It would be unfair, inequitable and economically infeasible to impose the Overuse Assessment on all of their groundwater production.

Proposed Resolution 2025-3 correctly limits the application of the Overuse Assessment to overuse by "water rights holders", which is in turn defined under section 1.111 of the Judgment as "A Party that holds an Allocation". For avoidance of confusion in the future application of Resolution 2025-3, we ask the Watermaster Board to clarify that the Overuse Assessment established under the resolution does not apply to Omitted Rights Holders.

Sincerely,

Michele A. Staples

Attachments

Cc: Tiffany North, County Counsel, County of Ventura, tiffany.north@ventura.org
Jason Canger, Assistant County Counsel, County of Ventura, jason.canger@ventura.org
Elizabeth Ewens, Stoel Rives, elizabeth.ewens@stoel.com

1710929.1

Jackson Tidus
A LAW CORPORATION

June 24, 2024

Direct Dial: 949.851.7409
Email: mstaples@jacksontidus.law
Reply to: Irvine Office
File No: 10547-128970

VIA E-MAIL AND U.S. MAIL

Board of Directors
Fox Canyon Groundwater Management Agency
Las Posas Valley Watermaster
800 South Victoria Avenue
Ventura, CA 93009-1610
FCGMA@ventura.org

Re: ***Las Posas Valley Water Rights Coalition, et al. v. Fox Canyon Groundwater Management Agency, et al.*: (1) Notification of Violation of Landowner Notice Requirements; and (2) Demand for Preservation of Evidence**

Dear Honorable Board Members:

We represent landowners asserting overlying water rights in the Las Posas Valley Groundwater Basin ("Basin") who were not provided mailed or posted notice of the action entitled *Las Posas Valley Water Rights Coalition, et al. v. Fox Canyon Groundwater Management Agency, et al.*, Santa Barbara County Superior Court Case No. VENCI00509700 (the "Basin Adjudication"), in violation of the streamlined adjudication statutes (see, e.g., Code of Civil Procedure ("CCP") § 836(d); Water Code §§ 10720.5(c)).

Nevertheless, the Judgment incorrectly concludes at page 2, Paragraph E:

> All holders of fee title to real property in the Basin were identified using the assessors records of the County of Ventura, and were served the Notice, Complaint, and Form Answer by registered mail, return receipt requested as required by Code of Civil Procedure section 836. Where the physical address of the real property differed from the mailing address of the holder of fee title, the Notice, Complaint, and Form Answer were mailed by registered mail, return receipt requested, to the physical address of the real property and the mailing address of the holder of fee title. A notice of completion of mailing was filed with the Court on June 3, 2019, consistent with Code of Civil Procedure section 836.

Plaintiffs' Notice of Completion of Mailing filed June 3, 2019 and the supporting Declaration of Jennifer M. Keough, CEO of JND Legal Administration LLC ("JND"), do not

support the Judgment's conclusion that the requirements for notice under Code of Civil Procedure section 836 were complied with, and we found no other supporting evidence in the Court Docket. JND did not respond to our informal requests for information about addresses to which the Adjudication Notice Packets were mailed, which return receipts were received, or which parcels were posted with Adjudication Notice Packets.

Additionally, the Judgment entered in the Basin Adjudication fails to allocate groundwater to the Omitted Rights Holders, fails to reflect their water right priorities, does not treat them equitably as compared to the parties who participated in the Basin Adjudication, and does not take into account the groundwater used by those of our clients who are small farmers, all in violation of CCP section 850(a). Therefore, we are submitting this formal Demand for Preservation of Evidence in an effort to maintain Fox Canyon Groundwater Management Agency ("FCGMA") and Las Posas Valley Watermaster ("Watermaster") Documents and information related to whether notice was provided as required by law for purposes of potential litigation/alternative dispute resolution.

Litigation Hold and Preservation of Evidence

The Omitted Rights Holders hereby demand that FCGMA and the Watermaster preserve all Documents[1], tangible things, and electronically stored information ("ESI" as defined below) potentially relevant, and/or reasonably calculated to lead to the discovery of admissible evidence relating to:

- ***Plaintiffs' mailed notices, posted notices and published notices of the Basin Adjudication required by CCP § 836(d);***
- ***Plaintiffs' request to FCGMA for names and addresses of persons reporting extractions within the Basin required by CCP § 836.5(a); and***
- ***FCGMA's response to Plaintiffs' request required by CCP § 836.5(b)***.

As demanded in this letter, the requirement to maintain all Documents and information also pertains to any individual and/or entity working on behalf, or at the direction, of FCGMA or the Watermaster. This includes all employees, officers, directors, attorneys, accountants, partners, representatives, agents, independent contractors, divisions, and any third parties acting

[1] The term "Documents" and/or "Document" has the broadest meaning permissible pursuant to California Evidence Code § 250 and includes, without limitation, all writings, papers, books, records, memoranda, contracts, pictures, photographs, printouts, electronic data compilations, diskettes, tapes, media, and all other tangible things upon which any hand writing, typing, printing, drawing, representation, photostatic or copy, magnetic or electronic impulse, or other form of communication recorded or reproduced, and includes preliminary drafts, studies, analyses and reports as well as any and all non-identical copies of any of the foregoing now in the possession, custody, or control of each person, and her, his, or its counsel, agents, employees, and any and all persons acting on her, his, or its behalf. "Documents" includes all electronic and physical versions of any documents, including ESI.

on behalf of FCGMA or the Watermaster, whether or not those third parties are paid in performing their duties.

FCGMA and the Watermaster must anticipate that information either relevant to, and/or reasonably calculated to lead to the discovery of admissible evidence in, this matter is in its possession, custody, or control. The requested information includes all documents initially in FCGMA's or the Watermaster's possession, custody, or control and/or created by FCGMA or the Watermaster, as well as all Documents and information obtained by FCGMA or the Watermaster during the course of the Basin Adjudication, whether through formal discovery or otherwise. Such information may reside, without limitation, on current and former computer systems and removable electronic media, all computer systems, services, servers, and devices (including all remote access and wireless devices) used in any way relating to the Basin Adjudication, including, without limitation, phones and tablets, online repositories, and on other storage media and sources, voice and video recording systems, cloud storage services, servers, and social networking accounts. This may include, but not be limited to, Documents stored on the personal devices of Watermaster employees and/or those working on its behalf and/or at its direction (including all lawyers, consultants, experts, employees and independent contractors).

Electronically stored information ("ESI") shall be afforded the broadest possible meaning and includes, without limitation, potentially relevant information stored electronically, magnetically, optically, or otherwise as and on:

- Digital Communications (e.g., electronic mail ("email"), voicemail, text messages, WhatsApp messages, Facebook Messenger messages, or messages stored on SIM cards)
- Email Servers (e.g., Microsoft 365, Gmail, or Microsoft Exchange databases)
- Word Processed Documents (e.g., Microsoft Word, Apple Pages, or Google Docs files and drafts)
- Spreadsheets and Tables (e.g., Microsoft Excel, Apple Numbers, or Google Sheets files and drafts)
- Presentations (e.g., Microsoft PowerPoint, Apple Keynote, or Google Slides files and drafts)
- Social Networking Sites (e.g., Facebook, Twitter, Instagram, or LinkedIn)
- Online "Cloud" Repositories (e.g., Drive, OneDrive, Box, DropBox, iCloud, AWS, or Azure)
- Calendar, Journaling, and Diary Application Data (e.g., Microsoft Outlook PST, Google Calendar, or iCal)
- Online Access Data (e.g., Temporary Internet Files, Web cache, Google history, cookies)
- Routers and any other internet access devices
- Encrypted messages

ESI resides not only in areas of electronic, magnetic, and optical storage media

reasonably accessible, but also in areas that may not be deemed reasonably accessible. Regardless, FCGMA and the Watermaster are obligated to preserve potentially relevant evidence that resides in areas both reasonably accessible and not reasonably accessible, even if such ESI is not anticipated to be produced or claims may be made that such ESI is confidential or privileged from disclosure.

It is hereby demanded that FCGMA and the Watermaster act immediately to preserve potentially relevant Documents, tangible things, and ESI, including, without limitation, information with the earlier of a "Created" or "Last Modified" date on or after January 1, 2018 through the date of this demand and continuing thereafter.

Adequate preservation of ESI requires more than simply refraining from efforts to delete, destroy, or dispose of such evidence. FCGMA and the Watermaster must intervene to prevent loss due to routine operations or active deletion by employing proper techniques and protocols to preserve ESI. Many routine activities serve to irretrievably alter evidence and constitute unlawful spoliation of evidence.

Nothing herein shall be read to limit or diminish any concurrent common law and statutory obligations to preserve Documents, tangible things, and other potentially relevant evidence. These duties and obligations exist under federal and state law, and require FCGMA and the Watermaster to preserve evidence of the subject-matter of litigation from the moment such litigation is reasonably anticipated. (*See e.g., Montoya v. Orange County Sheriff's Dept.,* 987 F.Supp.2d 981, 1010 (C.D. Cal. 2013) (citing *Apple Inc. v. Samsung Electronics Co., Ltd.,* 881 F.Supp.2d 1132, 1136 (N.D. Cal. 2012).) Since the Basin Adjudication was filed on March 27, 2018, such preservation must date back at least that far, but we are demanding preservation back to January 1, 2018. Further, "[w]hen a company or organization has a document retention policy, it is obligated to suspend that policy and implement a litigation hold to ensure the preservation of relevant documents after the preservation duty has been triggered." (*Apple Inc. v. Samsung Electronics Co., Ltd.*, *supra*, 881 F.Supp.2d at 1137.) The failure to preserve evidence may result in sanctions against FCGMA and the Watermaster. (See, e.g., *Kwan Software Eng'g, Inc. v. Hennings* (2020) 58 Cal.App.5th 57, 74; *Kim v. R Consulting & Sales, Inc.* (2021) 67 Cal.App.5th 263, 268–269.)

Suspension of Routine Destruction

Demand is hereby made that FCGMA and the Watermaster immediately initiate a hold for potentially relevant ESI, Documents, and tangible things and to act diligently and in good faith to secure and audit compliance with such hold. Demand is further made that FCGMA and the Watermaster immediately identify and modify or suspend features of their information systems and devices that, in routine operation, operate to cause the loss of potentially relevant ESI, if such features or operations exist. Examples of such features and operations may include, without limitation:

- Purging the contents of email and messaging repositories by age, quota, or other criteria;

- Using data or media wiping, disposal, erasure, or encryption utilities or devices;
- Overwriting, erasing, destroying, or discarding backup media;
- Re-assigning, re-imaging, or disposing of systems, servers, devices, or media;
- Running "cleaner" or other programs effecting wholesale metadata alteration;
- Releasing or purging online storage repositories or non-renewal of online accounts;
- Using metadata stripper utilities;
- Disabling server, packet, or local instant messaging logging; and
- Executing drive or file defragmentation, encryption, or compression programs.

Guard Against Deletion and Spoliation

FCGMA and the Watermaster should anticipate the potential that their employees, officers, directors, attorneys, accountants, bookkeepers, consultants, partners, representatives, agents, independent contractors, divisions, and/or any third parties acting on their behalf, or at their direction, may seek to hide, destroy, or alter ESI. FCGMA and the Watermaster must act to prevent and guard against such actions. Especially where machines were used for internet access or personal communications, it must be anticipated that users may seek to delete or destroy information they regard as personal, confidential, incriminating, or embarrassing, and, in so doing, may also unintentionally delete or destroy potentially relevant ESI.

FCGMA and the Watermaster must take affirmative steps to prevent anyone with access to their data, systems, accounts, and archives from seeking to modify, destroy, or hide potentially relevant ESI wherever it resides (such as by deleting or overwriting files, using data shredding and erasure applications, re-imaging, damaging or replacing media, encryption, compression, steganography, or the like).

Preservation in Native Forms

FCGMA and the Watermaster must anticipate that ESI, including, without limitation, emails, text messages, Documents, spreadsheets, presentations, and databases, will be sought in the form(s) in which it is ordinarily maintained (i.e., native form). Accordingly, demand is hereby made that FCGMA and the Watermaster preserve ESI in such native forms, and ensure that no methods be employed to preserve ESI that removes or degrade the ability to search the ESI by electronic means or that make it difficult or burdensome to access or use that information.

It is also requested that FCGMA and the Watermaster refrain from actions that shift ESI from reasonably accessible media and forms to less accessible media and forms if the effect of such actions is to make such ESI not reasonably accessible. This includes, but is not limited to, maintaining all metadata.

Metadata

FCGMA and the Watermaster should anticipate the need to disclose and produce system and application metadata and act to preserve it. System metadata is information describing the history and characteristics of other ESI. This information is typically associated with tracking or managing an electronic file and often includes data reflecting a file's name, size, custodian, location, and dates of creation and last modification. Application metadata is information automatically included or embedded in electronic files, but which may not be apparent to a user, including deleted content, draft language, commentary, tracked changes, speaker notes, collaboration and distribution data, and dates of creation and printing. For email, metadata includes all header routing data and Base 64 encoded attachment data, in addition to the To, From, Subject, Received Date, CC, and BCC header fields.

Metadata may be overwritten or corrupted by careless handling or improper preservation, including by carelessly copying, forwarding, or opening files.

Servers

With respect to servers used to manage email *(e.g.,* Microsoft 365, Gmail, Microsoft Exchange) and network storage (referred to as a "network share"), the complete contents of all relevant custodians network share and email accounts must be preserved. If FCGMA or the Watermaster is uncertain whether the preservation method they plan to employ is one that we will deem sufficient, please contact the undersigned.

Home Systems, Laptops, Phones, Tablets, Online Accounts, Messaging Accounts, and Other ESI Sources

Though we expect that FCGMA and the Watermaster will act swiftly to preserve data on office workstations and servers, they also must determine whether any home or portable systems or devices may contain potentially relevant data. To the extent that any potentially relevant emails or other digital communications have been sent or received, or potentially relevant Documents have been created or viewed away from the office, the contents of systems, devices, and media used for these purposes (including not only potentially relevant data from portable or home computers, but also from external storage devices, thumb drives, CD-R/DVD-R disks, and the user's phone, tablet, voice mailbox, or other forms of ESI storage) must be preserved.

Similarly, if FCGMA or the Watermaster use(d) online or browser-based email and messaging accounts or services/servers (such as Gmail, Yahoo Mail, Microsoft 365, Slack, Apple Messaging, WhatsApp, or the like) to send or receive potentially relevant messages and attachments, the contents of these account mailboxes and messages must be preserved.

Ancillary Preservation

The Omitted Rights Holders demand FCGMA and the Watermaster preserve passwords, keys, and other authenticators required to access encrypted files or run applications, along with the installation disks, use manuals, and license keys for applications required to access the ESI.

Paper Preservation of ESI is Inadequate

As hard copies do not preserve electronic searchability or metadata, they are not an adequate substitute for, or cumulative of, electronically stored versions. If information exists in both electronic and paper forms, FCGMA and the Watermaster should preserve both forms.

Agents, Attorneys, and Third Parties

FCGMA and the Watermaster's preservation obligations extend beyond ESI in their care, possession, or custody and includes ESI in the custody of others that are subject to the direction or control of FCGMA or the Watermaster. Accordingly, it is hereby demanded that FCGMA and the Watermaster immediately notify any current or former employees, officers, directors, attorneys, accountants, bookkeepers, consultants, partners, representatives, agents, independent contractors, divisions, and/or third parties acting on their behalf in possession of potentially relevant ESI to preserve such ESI and all relevant evidence to the full extent of the obligations to do so referenced in this letter, and take reasonable steps to secure their compliance.

We are available to discuss reasonable preservation steps at your convenience; however, FCGMA and the Watermaster must not defer preservation steps pending such discussions, as ESI and other evidence may be lost or corrupted because of delay. Should the failure to preserve potentially relevant evidence result in the corruption, loss, or delay in production of evidence to which the Omitted Rights Holders are entitled, such failure would constitute spoliation of evidence.

Please confirm by June 28, 2024 that FCGMA and the Watermaster have taken the steps outlined in this letter to preserve all Documents, tangible things, and ESI potentially relevant to this matter.

Sincerely,

Michele Staples

Cc: Arne Anselm, Interim Executive Officer, Arne.anselm@ventura.org
Tiffany North, County Counsel, County of Ventura, tiffany.north@ventura.org
Jason Canger, Assistant County Counsel, County of Ventura, jason.canger@ventura.org
Elizabeth Ewens, Stoel Rives, elizabeth.ewens@stoel.com

From: Michele Staples
Sent: Friday, September 13, 2024 6:17 PM
To: LPV.Watermaster@ventura.org
Subject: COMMENTS ON WATERMASTER TENTATIVE DECISIONS ON REQUESTS FOR CORRECTION TO GROUNDWATER SCHEDULE FOR WY2024

We represent the following landowners overlying the Las Posas Valley Groundwater Basin ("Basin") who have historically used groundwater from the Basin for agricultural and/or domestic use on their overlying land, have regularly reported their groundwater extractions to Fox Canyon Groundwater Management Agency, but are omitted from the parties receiving Allocations under the Judgment as a result of the violations of the Streamlined Groundwater Adjudication Act and irregularities in the Court proceedings. The omitted overlying landowners would suffer significant damage such as loss of productive use of their land and their livelihood without that water source. Their extractions during 2013-2019 (the period used to calculate Allocations under the Judgment) are on the order of 1,200 AFY.

We understand that it is the Court and not the Watermaster that has authority to correct the Allocations, and we will move the Court accordingly. We ask the Watermaster to make allowance for Court corrections to Allocations in considering the Groundwater Schedule for WY2024. Thank you

1. Marvin Franklin
2. Adan Chairez, Successor Trustee of the Jose I. Chairez and Rosa D. Chairez Revocable Trust
3. Richard F. Rhoads and Brenda Rhoads, as Trustees of the Rhoads 1987 Family Trust dated February 25, 1987
4. Terry Phillips, Trustee of the Phillips Trust dated January 22, 1997
5. Harold Douglas Sulser
6. Brian Williams and Caran Williams
7. Daryl E. Smith and Susan L. Smith trustees of the Daryl and Susan Smith Family Trust dated November 30, 2015
8. Joe Gillaspy and Cheryl Gillaspy, Trustees, Gillaspy Family 2004 Revocable Trust dated June 8, 2004
9. Gary G. Cerveny and Diane Cerveny, Trustees of the Cerveny Family Trust dated 11/8/1992 as restated on April 3, 2017
10. Laureate Farm Trust dated October 8, 2012, Richard W. Gray and Laura C. Gray, trustees

11. Mina Laya Haddadzadeh, Trustee of the Mina Laya Haddadzadeh Trust dated October 9, 2017
12. SSL Management LLC
13. Sunil Kumar Sreerama
14. Ventavo Farms LLC, a California limited liability company
15. Douglas J. Homze and Sharon M. Homze as Trustees of the Homze Family Living Trust, dated 9/22/23
16. Robert J. Perry
17. Mohammad Riaz and Parveen Akhtar Riaz, Trustees of the Riaz Family Trust, dated February 26, 2009
18. Jacob Dakessian, Trustee of the Survivor's Trust established under the Dakessian Family Trusts, and Jacob Dakessian, Trustee of the Unified Credit Trust established under the Dakessian Family Trusts
19. Ashish Shah and Payal Kamdar
20. Beardsley Associates, a California General Partnership
21. Debra B. Tash, as Trustee of the George Tash Administrative Trust created under the George Tash and Debra B. Tash Inter Vivos Trust agreement dated November 25, 1985, as amended and fully restated on July 18, 2022

Thank you

Michele A. Staples
Shareholder
mstaples@jacksontidus.law
D: 949.851.7409
C: 949.233.5039

Jackson Tidus
A LAW CORPORATION
2030 Main Street, Suite 1500
Irvine, CA 92614
O: 949.752.8585
F: 949.752.0597
www.jacksontidus.law
Click here to share files larger than 25 MB

From: Ian Prichard <IPrichard@calleguas.com>
Sent: Tuesday, May 20, 2025 7:09 AM
To: Debra Tash <debra@debratash.com>
Subject: RE: Request for Agenda Item LV PAC

Hello, Debra. Request received.
All best,
Ian

Ian Prichard
Deputy General Manager
Calleguas Municipal Water District
805.256.0949 (call or text)

From: Debra Tash <debra@debratash.com>
Sent: Monday, May 19, 2025 6:45 PM
To: Ian Prichard <IPrichard@calleguas.com>
Subject: Request for Agenda Item LV PAC
Importance: High

Dear Mr. Prichard

Request to be placed on the agenda to discuss staying all fines and fees for those property owners currently in litigation (or on appeal) concerning their zero allocation under the adjudication. Request that fines would only be imposed if the property owners lose in court with the appeal and continue to use their wells without authorization from the Watermaster.

Sincerely,
Debra Tash

DEBRA TASH
To send me items securely, click:
https://bracket.email/debra

FOX CANYON GROUNDWATER MANAGEMENT AGENCY

A STATE OF CALIFORNIA WATER AGENCY

June 25, 2025

Board of Directors
Fox Canyon Groundwater Management Agency
800 South Victoria Avenue
Ventura, CA 93009-1600

SUBJECT: Adopt the 2025 Las Posas Valley Basin Optimization Plan and Related Response Reports [LPV Watermaster] – *(Returning Item)*

RECOMMENDATIONS: (1) Receive an Agency staff presentation on the Las Posas Valley Basin Optimization Plan and related Recommendation and Response Reports; **(2)** approve the Response Reports to the Policy Advisory and Technical Advisory Committees' Recommendation Reports; and **(3)** adopt the Las Posas Valley Basin Optimization Plan (BOP).

BACKGROUND:
The Judgment requires Watermaster prepare a Basin Optimization Yield Study. (Judgment, §§ 3.3, 4.10, 5.1.) The Basin Optimization Yield Study (BOYS) will establish the operating yield, and in turn the amount and rate of rampdown, in each water year (WY) through WY 2039 so that the operating yield and sustainable yield for the Las Posas Valley (LPV) Basin match by WY 2040 and thus result in the LPV Basin being managed sustainably in accordance with the Sustainable Groundwater Management Act (SGMA) (Judgment, § 4.10.2.). Critical to the development of the of BOYS is the is Basin Optimization Plan (BOP), whose purpose is to evaluate and select the "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 [acre-feet per year] or as close thereto as achievable" (Judgment § 5.3).

DISCUSSION:
On January 12, 2024, your Board approved a scope of work for the preparation of the BOP. On December 12, 2024, Agency staff in compliance with the Judgment requested consultation on a draft BOP from the Policy Advisory Committee (PAC) and the Technical Advisory Committee(TAC). Both committees developed their recommendations over at least three committee meetings and submitted recommendation reports to the Watermaster on February 06, 2025 (PAC) and February 11, 2025 (TAC).

Both committees provided extensive valuable recommendations and/or comments on the draft BOP. The PAC's recommendation report included 6 recommendations and an attachment with 99 comments by specific PAC members on specific sections of the draft BOP. The TAC's recommendation report included 10 recommendations and an attachment with 129 comments by each of the TAC members on specific sections of the of the draft BOP. Based on the committee feedback, Watermaster staff working with their consultant, Dudek, revised the draft 2025 Basin Optimization Plan (Exhibit 11A) and crafted response reports to both the PAC and TAC recommendation reports addressing each individual recommendation and comment on the draft BOP (Exhibits 11B, 11C, 11D and 11E).

CONCLUSION:
Agency staff recommends your Board (1) receive and file this presentation; (2) approve Agency staff's draft response reports to the PAC and TAC recommendation reports; and (3) adopt the 2025 Basin Optimization Plan for the Las Posas Valley Basin.

This letter has been reviewed by Agency Counsel. If you have any questions, please call me at (805) 654-3942.

Sincerely,

Kudzai Farai Kaseke (Ph.D., PH, PMP, CSM)
Assistant Groundwater Manager

Attachments:

Exhibit 11A – Draft 2025 Las Posas Valley Basin Optimization Plan
Exhibit 11B – Draft Watermaster Response Report to PAC, May 03, 2025
Exhibit 11C – PAC Recommendation Report, February 06, 2025
Exhibit 11D – Draft Watermaster Response Report to TAC, May 05, 2025
Exhibit 11E – TAC Recommendation Report, February 11, 2025

Draft Las Posas Valley Basin Optimization Plan

JUNE 2025

Prepared for:

FOX CANYON GROUNDWATER MANAGEMENT AGENCY
LAS POSAS VALLEY BASIN WATERMASTER
800 South Victoria Avenue
Ventura, California 93009-1610
Contact: Farai Kaseke, PhD, PH, PMP, CSM

Prepared by:

DUDEK
605 Third Street
Encinitas, California 92024

Table of Contents

SECTION **PAGE NO.**

TABLES

APPENDICES

Acronyms and Abbreviations

Acronym/Abbreviation	Definition
AF	Acre-Feet
AFY	Acre-Feet per Year
ASR	Aquifer Storage and Recovery
CPI	Consumer Price Index
City	City of Simi Valley
CMWD	Calleguas Municipal Water District
ELPMA	East Las Posas Management Area
ET	Evapotranspiration
FCGMA	Fox Canyon Groundwater Management Agency
Judgment	Judgment in Las Posas Valley Water Rights Coalition, et al., v. Fox Canyon Groundwater Management Agency, Santa Barbara Sup. Ct. Case No. VENC100509700
LPV	Las Posas Valley Groundwater Basin (DWR Basin No. 4-008)
MWC	Mutual Water Company
NPDES	National Pollutant Discharge Elimination System
O&M	Operations and Maintenance
PAC	Policy Advisory Committee
RWQCB	Regional Water Quality Control Board
SGMA	Sustainable Groundwater Management Act
SMP	Salinity Management Pipeline owned and operated by CMWD
SVWQCP	Simi Valley Water Quality Control Plant
TAC	Technical Advisory Committee
TDS	Total Dissolved Solids
TMDL	Total Maximum Daily Load
VCWWD-1	Ventura County Waterworks District No. 1
VCWWD-19	Ventura County Waterworks District No. 19
WLPMA	West Las Posas Management Area
WWDs	Ventura County Waterworks Districts

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1 Introduction

This is the initial Basin Optimization Plan prepared in conformance with the Judgment adjudicating groundwater rights in the Las Posas Valley (LPV) Groundwater Basin. The purpose of this Basin Optimization Plan is to evaluate and select the "*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* [acre-feet per year] *or as close thereto as achievable"* (Judgment § 5.3). This Basin Optimization Plan reviews the Basin Optimization Projects in order to (1) identify the projects that should be funded and scheduled for implementation in the next five years; and (2) identify the projects to be included in the initial Basin Optimization Yield Study. The Basin Optimization Yield Study will establish the Rampdown Rate (Judgment § 4.10.1.4).

Both the Basin Optimization Plan and the Basin Optimization Yield Study must be reviewed and updated, with Committee consultation, at least every five years (Judgment § 5.3.4). Additionally, the Basin Optimization Plan can be amended or additional projects included if they meet the required criteria, as determined in Watermaster's discretion, subject to Committee Consultation (Judgment § 5.3.2.2).

1.1 LPV Judgment

On July 10, 2023, the Santa Barbara Superior Court issued a statement of decision adopting a judgment in Las Posas Valley Water Rights Coalition, et al., v. Fox Canyon Groundwater Management Agency, Santa Barbara Sup. Ct. Case No. VENC100509700 (Judgment). The Judgment adjudicates all groundwater rights in the LPV Basin and provides for the LPV Basin's sustainable management pursuant to the Sustainable Groundwater Management Act (SGMA). The Judgment appoints Fox Canyon Groundwater Management Agency (FCGMA) as the Watermaster to implement and administer the Judgment.

As outlined in the Judgment, Watermaster, in consultation with the LPV Policy Advisory Committee (PAC) and Technical Advisory Committee (TAC), is responsible for developing a Basin Optimization Plan for the LPV Basin. The Basin Optimization Plan is designed to identify, evaluate, and prioritize projects that are "practical, reasonable, and cost-effective to implement prior to 2040 to maintain the Operating Yield[1] at 40,000 AFY or as close thereto as achievable" (Judgment § 5.3.2.2). Consistent with this objective, the Basin Optimization Plan is required to include:

- *The criteria for determining the priority and feasibility of each Basin Optimization Project. Such criteria shall include, but not be limited to, the estimated amount of yield augmentation, cost effectiveness, cost feasibility, technical/engineering feasibility, project implementation timing, benefits relative to the achievement of Sustainable Groundwater Management, and whether the collaboration, cooperation, or participation of the FCGMA, Calleguas, WWDs, United Water Conservation District, or the Water Right Holders is necessary or desirable for implementation of the Basin Optimization Project. Using the approved*

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

project criteria following Committee Consultation, Watermaster shall select Basin Optimization Projects for consideration in the Basin Optimization Plan (Judgment § 5.3.2.1);

- *A description of Basin Optimization Projects that are likely to be practical, reasonable, and cost-effective to implement prior to 2040 to maintain the Operating Yield at 40,000 AFY or as close thereto as achievable. Any additional projects to be included in the Basin Optimization Plan, or any amendment thereto, must satisfy the criteria established under Section 5.3.2.1 as determined in Watermaster's discretion, subject to Committee Consultation* (Judgment § 5.3.2.2);
- *An analysis of whether any of the Basin Optimization Projects (i) are consistent with SGMA and the achievement of Sustainable Groundwater Management, and (ii) will prevent or alleviate, or cause or exacerbate, Undesirable Results or Material Injury* (Judgment § 5.3.2.3);
- *A prioritization schedule of the Basin Optimization Projects to be implemented* (Judgment § 5.3.2.4);
- *A schedule for the Basin Optimization Projects which are to be implemented to be evaluated, scoped, designed, financed, and developed. If the collaboration, cooperation, or participation of the FCGMA, Calleguas, WWDs, United Water Conservation District, or the Water Right Holders is necessary or desirable for any evaluation, scoping, design, financing, and development of any Basin Optimization Project, the schedule shall so consider the time necessary for such collaboration or cooperation* (Judgment § 5.3.2.5); and
- *A five-year budget for the costs of capital improvements, and the operation and maintenance, of the Basin Optimization Projects. The five-year budget shall include a determination of the annual costs of Basin Optimization Projects implemented or in the process of being implemented* (Judgment § 5.3.2.6).

1.2 Summary of Projects Evaluated

Projects evaluated in this Basin Optimization Plan have been identified by FCGMA and stakeholders via the Judgment, the LPV Groundwater Sustainability Plan (GSP), and the first Periodic Evaluation of the LPV GSP. Sections 2 through 5 present the project evaluations; project ranking and prioritization and projects selected for inclusion in the Basin Optimization Plan; schedule for implementation of the selected projects; and an estimated 5-year budget through fiscal year 2029-30 (ending June 30, 2030) for the selected projects. A total of nine projects were evaluated for potential inclusion in the Basin Optimization Plan (Table 1).

Table 1. Summary of Projects Evaluated

Project No.	Project Title	Description	Water Supply / Yield Augmentation	Project Proponent	Source(s)
1	Arroyo-Simi Las Posas Arundo Removal	*Arundo donax* removal, and periodic maintenance, from Arroyo Simi-Las Posas corridor	<500 AFY (up to 2,680 AFY with another project)	FCGMA	Judgment No. 1 (§ 5.4.1) GSP Project No. 2 GSP Evaluation Project No. 2
2	Purchase of Imported Water from CMWD for Basin Replenishment[a]	Purchase of 1,760 AFY of imported water from CMWD for delivery to Zone MWC and VCWWD-19, and 1,380 AFY to VCWWD-1, in lieu of groundwater extraction	3,140 AFY	FCGMA	Judgment Nos. 1&2 (§§ 5.4.2 & 5.4.9) GSP Project No. 1 GSP Evaluation Project No. 1
3	Arroyo Las Posas Storm Water Capture and Recharge	Storm water capture and recharge at existing Moorpark Water Treatment Plant percolation ponds to increase recharge to the ELPMA	<500 AFY (up to 2,000 AFY with another project)	VCWWD-1	Judgment No. 3 (§ 5.4.3) GSP Evaluation Project No. 6
4	Moorpark Desalter	Construction of a desalter well field, conveyance infrastructure, and treatment system to manage water quality and increase recharge in southern ELPMA	Approximate net loss of 2,800 AFY (up to 4,680 AFY with another project)	VCWWD-1	Judgment No. 4 (§ 5.4.4) GSP Evaluation Project No. 5
5	Arroyo Simi-Las Posas Water Acquisition	Formalize an agreement between FCGMA and the City of Simi Valley to maintain discharges from SVWQCP to Arroyo Simi-Las Posas to maintain recharge to the ELPMA	Prevent approximately 2,200 AFY loss of sustainable yield	FCGMA	Judgment No. 5 (§ 5.4.5) GSP Project No. 3 GSP Evaluation Project No. 3
6	Delivery of Recycled Water to Las Posas Valley Users via Pipeline	Construction of conveyance infrastructure, and development of agreements, to deliver SVWQCP recycled water to Las Posas Valley users via pipeline in lieu of pumping	Estimated at approximately 640 to 1,600 AFY of avoided ET loss	FCGMA	Judgment No. 6 (§ 5.4.6)
7	In Lieu Deliveries to Northern East Las Posas Management Area Feasibility Study	Study to evaluate the feasibility of providing supplemental water supplies to the northern area of the ELPMA in addition to Project 2	Unknown	FCGMA	Judgment No. 7 (§ 5.4.7) GSP Evaluation Project No. 9
8	Allocation Buyback and Reduction Program	Develop a program for the least cost acquisition of Allocation Basis, Annual Allocations, and/or Carryover	Unknown	FCGMA	Judgment No. 8 (§ 5.4.8)
9	Regional Desalter Feasibility Study	Study to evaluate the feasibility of constructing and operating a regional groundwater desalter as an alternative to Project 4 Moorpark Desalter	Unknown	FCGMA	GSP Evaluation Project No. 7

Notes: Projects are not in order of prioritization. FCGMA = Fox Canyon Groundwater Management Agency; VCWWD-1 = Ventura County Waterwork District No. 1; AFY = Acre-Feet per Year; ET = evapotranspiration; SVWQCP = Simi Valley Water Quality Control Plant.

[a] Projects identified in Judgment sections 5.4.2 and 5.4.9 were combined based on TAC recommendation (TAC, August 27, 2024).

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2 Project Evaluation and Prioritization

2.1 Project Evaluation Criteria

FCGMA, in consultation with the LPV PAC and TAC, developed the following criteria to evaluate and prioritize projects that are "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). Consistent with the Judgment, these criteria include "*the estimated amount of yield augmentation, cost effectiveness, cost feasibility, technical/engineering feasibility, project implementation timing, benefits relative to the achievement of Sustainable Groundwater Management, and whether the collaboration, cooperation, or participation of the FCGMA, Calleguas, WWDs, United Water Conservation District, or the Water Right Holders is necessary or desirable for implementation of the Basin Optimization Project*" (Judgment § 5.3.2.1). These criteria are divided into four categories: water supply/yield augmentation, timing and feasibility, cost and funding, and additional project considerations. Scores are assigned to each project evaluation category such that water supply/yield augmentation, timing and feasibility, and cost and funding are equally weighted, and the additional project considerations hold less weight in evaluating the project's benefits and feasibility for implementation. Projects are prioritized by total project score. It should be noted that these project evaluation criteria were designed to evaluate and rank the benefits of water-supply projects. As a result, feasibility studies and data-gap projects tend to rank lower than projects that are well defined and readily implementable.

Draft project evaluation criteria were submitted to the LPV PAC for consultation on April 4, 2024, and to the LPV TAC for consultation on July 10, 2024. TAC prepared an August 27, 2024, recommendation report and Watermaster prepared a September 19, 2024, response report, which was accepted by the Watermaster Board on September 25, 2024.[2] The project evaluation criteria used for this Basin Optimization Plan are summarized below and included in Appendix A.

2.1.1 Water Supply

This category is defined to establish the estimated project benefits to the LPV through an increase in the sustainable yield, increase in the availability of supplemental water for use in lieu of groundwater, or a reduction in groundwater demand. Project benefits are scored based on:

1. The annual volume of increased sustainable yield, available supplemental water, or reduced groundwater demand provided by the project (maximum of 25 points).
2. The documentation provided to support the estimated quantification (maximum of 25 points).

A maximum of 50 points can be assigned to each project under the Water Supply category, as detailed in Appendix A.

[2] FCGMA / Watermaster Board meeting agenda packages and meeting minutes are available at www.fcgma.org.

2.1.2 Timing and Feasibility

Under the Judgment and SGMA, the LPV is mandated to achieve Sustainable Groundwater Management by 2040. This category addresses the timing and uncertainty of the project and evaluates the likelihood of a project's ability to be implemented and operational prior to 2040. Timing and feasibility are scored based on seven components:

1. Project implementation timeframe (maximum of 20 points)
2. Current stage of project development (maximum of 5 points)
3. Status of approvals, permits, and environmental compliance (maximum of 5 points)
4. Project complexity (maximum of 5 points)
5. Status of, and requirements for, land acquisition or easements (maximum of 5 points)
6. Dependency on other unbuilt or unfunded projects (maximum of 5 points)
7. Project lifespan (maximum of 5 points)

A maximum of 50 points can be assigned to each project under the Timing / Feasibility category, as detailed in Appendix A.

2.1.3 Cost and Funding

This category evaluates the cost / benefit of the project and the amount of capital and operations and maintenance (O&M) of non-FCGMA funding that is committed to the project. The cost and funding category is scored based on three separate components:

1. Total project cost per acre-foot (AF) of water generated or saved (maximum of 20 points)
2. Is the project proponent providing a funding match for project construction? (maximum of 15 points)
3. Is there a funding source other than FCGMA for ongoing operation & maintenance costs? (maximum of 15 points)

A maximum of 50 points can be assigned to each project under the Cost and Funding category, as detailed in Appendix A. Note that FCGMA funding would principally need to come from Basin Assessment, but that staff continuously monitor for potential grant or other project funding.

2.1.4 Additional Project Considerations

This category evaluates whether the Basin Optimization Projects (i) are consistent with SGMA and the achievement of Sustainable Groundwater Management, and (ii) will prevent or alleviate, or cause or exacerbate, Undesirable

Results[3] or Material Injury[4]. This assessment is based on the relationship between project implementation and the sustainability indicators defined in SGMA that are applicable to the LPV Basin. These include benefits relative to chronic lowering of groundwater levels, reduction of groundwater in storage, degraded water quality, land subsidence, and depletion of interconnected surface water. A total of 20 points can be assigned based on the number of sustainability indicators addressed by the project, as detailed in Appendix A.

Additionally, this category is used to identify whether the collaboration, cooperation, or participation of the FCGMA, Calleguas Municipal Water District (CMWD), WWDs, United Water Conservation District, or the Water Right Holders is necessary or desirable for implementation of the Basin Optimization Project.

2.2 Project Evaluations

The nine projects were evaluated based on the project evaluation criteria described in Section 2.1. Several projects were identified to be dependent on other unbuilt and unfunded projects. Projects with such dependencies were evaluated as standalone projects. Project interdependencies are summarized in Table 2.

2.2.1 Project 1: Arroyo Simi-Las Posas Arundo Removal

The Arroyo Simi–Las Posas Arundo Removal Project involves removal of the invasive plant species *Arundo donax* (Arundo) from approximately 324 acres of land along the Arroyo Simi-Las Posas corridor. Arundo would be replaced with native riparian plant species, which are estimated to consume approximately 6 to 25 AFY per acre less water than Arundo (VCWSD 2015). If all of the Arundo within the 324-acre area is removed, this project could result in up to an additional 2,680 AFY of recharge to the ELPMA (VCWSD 2015). However, numerical groundwater modeling conducted for the GSP Periodic Evaluation (FCGMA 2024) found that the full water-supply benefits of this project would be realized only if it is implemented in conjunction with implementation of other projects, such as the Moorpark Desalter (Project 4), that would increase recharge potential in the ELPMA. If implemented in conjunction with a project to increase available storage capacity in the ELPMA, this project is anticipated to increase groundwater recharge to the ELPMA as well as improve the health of riparian habitat along Arroyo Simi-Las Posas.

[3] Undesirable Result(s) is defined in Judgment section 1.108: As defined in Water Code section 10721(x), one or more of the following effects caused by Groundwater conditions occurring throughout the Basin: (1) Chronic lowering of groundwater levels indicating a significant and unreasonable depletion of supply if continued over the planning and implementation horizon. Overdraft during a period of drought is not sufficient to establish a chronic lowering of groundwater levels if extractions and groundwater recharge are managed as necessary to ensure that reductions in groundwater levels or storage during a period of drought are offset by increases in groundwater levels or storage during other periods. (2) Significant and unreasonable reduction of groundwater storage. (3) Significant and unreasonable seawater intrusion. (4) Significant and unreasonable degraded water quality, including the migration of contaminant plumes that impair water supplies. (5) Significant and unreasonable land subsidence that substantially interferes with surface land uses. (6) Depletions of interconnected surface water that have significant and unreasonable adverse impacts on beneficial uses of the surface water.

[4] Material Injury is defined in Judgment section 1.64: A material and unreasonable impact to the Basin, any Management Area, Water Rights Holder, Party, well or water supply caused by the Extraction, storage, or Transfer of Groundwater in the Basin. Material Injury does not include economic injury that results from other than direct physical causes, including any adverse effect on water rates, lease rates, or demand for water. If fully mitigated, Material Injury shall no longer be considered to be occurring. Topics that may be considered in an analysis for a Material Injury determination include the following: (i) groundwater levels; (ii) groundwater in storage; (iii) groundwater quality; (iv) land subsidence; (v) natural recharge; and (vi) minimum thresholds and measurable objectives as set forth in SGMA and implementing regulations.

This project was included in the GSP and requires updated analysis to assess the current location, extent, and density of Arundo in the Arroyo Simi-Las Posas corridor. Because of this, this project would be implemented in two phases.

Phase I would cover project implementation planning activities consisting of the following:

- Examination of the originally proposed project area and comparison to the current state/condition of the removal areas,
- Identification of landowners within the project area,
- Establishment of access agreements with landowners,
- Reassessment of project area and evaluation of invasive vegetation extent,
- Preparation of a removal project workplan, and
- Environmental permit and compliance coordination.

This planning step is essential for evaluating removal-restoration labor and material costs, permitting requirements/restrictions, private property access agreements, restoration needs and ongoing maintenance.

Phase II would involve field work to remove Arundo from the Arroyo Simi-Las Posas Corridor. The full scope of work and project costs for this project phase will be developed in Phase I of the project. Giant reed removal activities performed by various local interests (e.g., Ventura County Public Works Agency, various developers, Rancho Simi Recreation and Parks District, and others) are ongoing in the Arroyo Simi and can serve as a model for the removal of invasive vegetation downstream as the Arroyo Simi transitions to the Arroyo Las Posas, within the Las Posas Valley Basin.

This project is consistent with the project in the Judgment titled *Removing, and periodic removal maintenance of Arundo donax from the Las Posas Valley watershed in an environmentally safe manner* (Judgment § 5.4.1).

Table 2. Project Interdependency

Project No.	Project Title	Management Area	Additional Water Supply – Project Only	Additional Water Supply with Other Projects	Related Projects	Notes
1	Arroyo Simi-Las Posas Arundo Removal	ELPMA	Unknown <500 AFY	2,680 AFY	Project 3 and 4	Increased storage with Desalter pumping which would allow for additional recharge. Note estimated increase of flow of 1,900 AFY in ELPMA, 780 AFY in Simi Valley.
2	Purchase of Imported Water from CMWD for Basin Replenishment	WLPMA	3,140 AFY	NA	None	
3	Arroyo Las Posas Storm Water Capture and Recharge	ELPMA	Unknown <500 AFY	2,000 AFY	Project 4	Additional recharge if companion project implemented to increase available groundwater storage capacity.
4	Moorpark Desalter	ELPMA	-2,800 AFY	Up to 4,680 AFY	Projects 1, 3, and 5	Additional supply if full benefits of Projects 1 & 3 are realized. Project concept reduces purchase of imported CMWD water for every AF of produced water.
5	Arroyo Simi-Las Posas Water Acquisition	ELPMA	0 AFY	0	Project 6	Project would maintain 1,700 AFY of SVWQCP discharge to Arroyo to prevent approximately 2,200 AFY loss of sustainable yield. Project (4 or 9) to desalt flows may be needed.
6	Delivery of Recycled Water to Las Posas Valley Users via Pipeline	ELPMA, potentially also WLPMA	640 - 1,600 AFY		Projects 5 and 9	Project would reduce Project 5 recharge to Arroyo, but would reduce ET losses. May provide additional benefit for Projects 1 & 3. May require companion desalter project.
7	In Lieu Deliveries to Northern East Las Posas Management Area Feasibility Study	ELPMA	Unknown	NA	None	
8	Developing a Least Cost Acquisition Program.	All	Unknown	NA	None	
9	Regional Desalter Feasibility Study	ELPMA	Unknown	Unknown	Projects 1, 3, and 6	Evaluation of a regional groundwater desalter as an alternative to Project 4.

2.2.1.1 Water Supply

Implementation of this project could increase recharge to the ELPMA by as much as 2,680 AFY if implemented (VCWSD 2015). This is based on the estimated reduction in evapotranspiration demands associated with the project, or portion of which would occur upstream of the LPV Basin (VCWSD 2015). However, numerical groundwater modeling conducted for the GSP Periodic Evaluation (FCGMA 2024) found that recharge to the ELPMA would occur only if one or more projects were implemented to increase the available groundwater storage space in the ELPMA, otherwise the additional flow in the Arroyo Las Posas would likely flow out of the LPV Basin and into the downstream Pleasant Valley Basin. As a stand-alone project, the Arroyo Simi-Las Posas Arundo Removal Project would not provide significant additional water-supply benefit to the LPV Basin.

2.2.1.2 Timing and Feasibility

Project Phasing and Timing

This project consists of two phases to support project planning, permitting, and coordination with landowners (Phase I) and project implementation (Phase II). This project is informed by a feasibility study, initially prepared in 2015, that requires updating through additional field and desktop activities to re-evaluate the Arundo removal locations, water saving estimates, and maintenance recommendations. FCGMA estimates that implementation of both project phases could be completed within four years of project initiation.

Environmental and Permitting

This project is in the planning phase and specific permitting and CEQA requirements will be identified in Phase I of project implementation.

Project Complexity

This project relies on existing technology and similar projects have been implemented across the Ventura Watershed by various local interests (e.g., Ventura County Public Works Agency, various developers, Rancho Simi Recreation and Parks District, and others). FCGMA anticipates the need to coordinate with landowners along Arroyo Simi-Las Posas for access agreements to perform field activities, including initial Arundo mapping, Arundo removal, and Arundo removal maintenance.

To provide benefit to the ELPMA, this project requires implementation of other project(s), such as the Moorpark Desalter (Project No. 4), that would 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.

Anticipated Project Lifespan

FCGMA anticipates that the project lifespan could exceed 25 years.

2.2.1.3 Cost and Funding

FCGMA estimates that the cost to implement Phase I of this project would be approximately $400,000. This includes costs to: (i) perform the initial field investigation / identification of Arundo removal locations, (ii) negotiate

easements with landowners, (iii) identify CEQA and permitting requirements, and (iv) develop an Arundo removal and maintenance work plan.

Capital and O&M costs for Phase II of this project were estimated by The Nature Conservancy in 2018 to support GSP development (FCGMA 2019). Adjusting The Nature Conservancy's cost estimates by the increase in Consumer Price Index (CPI) between 2018 and April 2025 leads to a capital cost estimate for Phase II of $9,400,000 and an O&M cost of $2,100 per acre of Arundo treated.[5]

Assuming a 25-year project lifespan and that the project will increase recharge to the ELPMA by 2,680 AFY, the total cost to implement this project is estimated at approximately $400 per AF if the full benefit is realized by implementation of another project to increase available groundwater storage capacity. However, as a stand-alone project the estimated cost would be much higher per AF of benefit. For example, if the benefit to the LPV Basin is only 250 AFY, then the estimated cost would be approximately $4,300 per AF.

No outside funding sources have been identified for this project and it would need to be funded through Basin Assessment. Because the project would result in habitat restoration along the Arroyo Simi-Las Posas, grant funding may be available to help fund the capital costs of this project.

2.2.1.4 Benefits Relative to Sustainable Groundwater Management

As a stand-alone project, groundwater modeling indicates that the majority of increased flow in the Arroyo Simi-Las Posas would flow through the LPV Basin and into the downstream Pleasant Valley Basin. Therefore, as a stand-alone project, the Arroyo Simi-Las Posas Arundo Removal Project would not provide significant benefits relative to sustainable groundwater management of the LPV Basin.

If the full benefits of this project are realized through implementation with a companion project to increase available groundwater storage capacity in the Shallow Alluvial Aquifer in the ELPMA, this project could provide up to 1,900 AFY of increased recharge and another 780 AFY of flow in the Arroyo Simi-Las Posas from the upstream Simi Valley Basin. The benefits would primarily be to the southern portion of the ELPMA. Groundwater flow modeling did not predict the northern portion of the ELPMA would benefit from this project as recharge from the Arroyo does not appear to influence this area. However, 2016 through 2022 extractions in the ELPMA averaged approximately 20,500 AFY, which exceeded the 17,900 AFY estimated sustainable yield of the ELPMA (not including the Epworth Gravels Aquifer; FCGMA 2024) by approximately 2,600 AFY.

2.2.1.5 Additional Project Considerations

Consistency with SGMA and Likelihood of Causing Material Injury or Undesirable Results

Implementation of this project is anticipated to support groundwater level and storage management within the ELPMA and is consistent with Sustainable Groundwater Management in the LPV. Implementation of this project is not anticipated to cause Undesirable Results and/or result in Material Injury that cannot be mitigated.

[5] https://www.bls.gov/data/inflation_calculator.htm

Collaboration Requirements

Implementation of this project will require coordination with landowners in the LPV to develop access agreements for Arundo mapping, removal, and O&M.

2.2.2 Project 2: Purchase of Imported Water from CMWD for Basin Replenishment

The Purchase of Imported Water from CMWD for Basin Replenishment project would supply imported water in lieu of groundwater extraction in two parts of the LPV Basin exhibiting chronic groundwater level declines. One is the area of a groundwater depression in the eastern WLPMA (FCGMA 2019). The other area is an area of a trend in long-term declining groundwater levels in the northern portion of the ELPMA. Both areas would rely on existing delivery infrastructure and would be limited to water purveyors with the ability to receive water from CMWD (FCGMA 2019). Project 7 is a feasibility study to evaluate the volume of supplemental water supplies needed to fully maintain groundwater elevations in the northern portion of the ELPMA and investigate other sources of supplemental water and infrastructure that may be needed.

Based on TAC recommendation, this project combines the two projects in the Judgment titled, *Importing of surplus water* and *Using Calleguas Facilities for Replenishment* (Judgment §§ 5.4.2 and 5.4.9).

2.2.2.1 Water Supply

During development of the GSP, FCGMA coordinated with CMWD, Zone MWC, and VCWWD-19, to estimate the volume of imported water that may be available to water purveyors within the WLPMA in CMWD's service area. In 2019, it was estimated that 1,760 AFY of CMWD water would be available for purchase and delivery to Zone MWC and VCWWD-19. CMWD represented in recent consultation that the limiting factor is the volume of imported water the two purveyors can accept to offset their pumping in the WLPMA. FCGMA used these projections for analysis of the project for this Basin Optimization Plan, however, the volume of in lieu water delivered during the 1995 through 2008 program through existing infrastructure was sufficient to mitigate the pumping depression. Additionally, Zone MWC is currently upgrading its main pipeline which will increase the quantity of water it can receive from CMWD. The volume of CMWD water needed to address the groundwater depression will be evaluated on an ongoing basis based on the groundwater monitoring program.

In the northern ELPMA, CMWD implemented an in-lieu program in late 1995 through early 2007. During this 11.5-year program, CMWD delivered an average of 1,380 AFY to VCWWD-1 in lieu of pumping. Unlike in the eastern portion of the WLPMA, the previous program did not appear to fully mitigate the long-term groundwater decline in the northern portion of the ELPMA. This Basin Optimization Plan uses the previous program average of 1,380 AFY for the Basin Optimization Yield Study modeling and includes Project 7 to conduct a feasibility study to expand the in-lieu program in this area.

2.2.2.2 Timing and Feasibility

Project Phasing and Timing

This project would implement an in-lieu program similar to the Metropolitan Water District of Southern California (MWD) incentivized program implemented by CMWD that was operational in the WLPMA between 1995 and 2008

and in the ELPMA between 1995 and 2007. Because this project will rely on existing infrastructure, it is anticipated that this project would consist of two phases: the first phase would be development of program policy by the Watermaster Board, determination of the pumping costs and amount of incentive, allocation of funds, and incentivization agreements to purchase water from CMWD; the second phase would be implementation of the project through purchase of imported water from CMWD in lieu of extraction by participating water purveyors. The program may need to be suspended during times of drought and/or if there is an imported water outage or other emergency.

Environmental and Permitting

Because this project will utilize existing infrastructure, no additional permitting or CEQA compliance is required to implement this project.

Project Complexity

This project relies on existing infrastructure and would establish a program similar to one that was operational between 1995 and 2008. Initiation and operation of this project is not technically complex and is not dependent on other unbuilt projects.

Anticipated Project Lifespan

The lifespan of the project is based on the reliability of CMWD receiving imported water from the State Water Project and MWD. Based on existing infrastructure, CMWD believes that it is likely that imported water will continue to be available for more than 50 years.

2.2.2.3 Cost and Funding

The cost to implement this project is driven by CMWD's water rates. CMWD's water rates are set each year; the current 2025 Tier 1 water rate is $1,895 per AF[6]. The project is envisioned to incentivize VCWWD-1, VCWWD-19, and Zone MWC, by funding the difference between the cost of CMWD water and the cost of pumping and any other incentive parameters, which will be determined during the first phase of this project. For the budget projections, pumping costs are assumed to be $500 per AF. Funding for this project would come from Basin Assessment.

2.2.2.4 Benefits Relative to Sustainable Groundwater Management

Implementation of this project would reduce groundwater production from the pumping depression located in the eastern portion of the WLPMA and in areas of the northern ELPMA with declining water levels. The purpose of the pumping reduction is to assist with water-level stabilization or recovery in these areas. Between 1995 and 2008, groundwater elevations in the eastern part of the WLPMA recovered by as much as 80 feet in response to in lieu deliveries from CMWD. These measured groundwater elevation recoveries demonstrate the efficacy of this project in managing groundwater levels in the WLPMA (FCGMA 2019). Groundwater elevations did not recover as significantly in the northern ELPMA, but the declining trend appeared to have been reduced. This project is anticipated to address groundwater levels that are currently, or have been in recent years, below the minimum threshold at four key wells in the WLPMA, and the northern ELPMA where groundwater elevations have exhibited

[6] https://www.calleguas.com/wp-content/uploads/2025/02/2025-Adopted-Water-Rates.pdf

historical declines that locally exceed 250 feet and groundwater modeling forecasts that groundwater elevations will drop below minimum thresholds at current pumping rates.

2.2.2.5 Additional Project Considerations

Consistency with SGMA and Likelihood of Causing Material Injury or Undesirable Results

Implementation of this project would be consistent with SGMA and is not anticipated to cause Undesirable Results and/or result in Material Injury that cannot be mitigated.

Collaboration Requirements

Implementation of this project will require coordination between FCGMA, CMWD, VCWWD-1, VCWWD-19, and Zone MWC.

2.2.3 Project 3: Arroyo Las Posas Storm Water Capture and Recharge

The Arroyo Las Posas Storm Water Capture and Recharge project is proposed by VCWWD-1 to divert storm flows from Arroyo Simi-Las Posas for recharge to the ELPMA. The proposed diversions would occur during high flow events via a new surface intake located near the existing stabilizer structure in the Arroyo Simi-Las Posas adjacent to the Moorpark Water Reclamation Facility operated by VCWWD-1. The storm flows would then be delivered to the existing 40-acres of percolation ponds to recharge the aquifers in the ELPMA.

This project is consistent with the project in the Judgment titled *Arroyo Las Posas storm water capture and recharge* (Judgment § 5.4.3).

2.2.3.1 Water Supply

VCWWD-1 has undertaken significant efforts to advance this project. These include geophysical surveys to characterize their existing percolation ponds and estimate infiltration rates, and hydrologic modeling to estimate the volume of storm flows that would be available for diversion. Their hydrologic modeling studies suggest that implementation of this project could provide up to 2,000 AFY of diversions to their percolation ponds (VCWWD-1, 2020). No groundwater modeling has been conducted to characterize the storage capacity of the Shallow Alluvial Aquifer, which underlies the existing percolation ponds, and typically has groundwater elevations that are similar to those in the Arroyo Las Posas streambed (FCGMA 2024). Without additional projects to lower the groundwater elevation in the Shallow Alluvial Aquifer, such as the Moorpark Desalter Project (Project 4), some, if not all of the water diverted to the recharge ponds, is likely to flow back into Arroyo Las Posas and downstream into the Pleasant Valley Basin. Therefore, if constructed as a standalone project, this project is unlikely to provide significant benefit to the LPV Basin.

2.2.3.2 Timing and Feasibility

Project Phasing and Timing

VCWWD-1 completed a feasibility study for this project in March 2025, however, it was not available for review at the time of preparation of this Basin Optimization Plan. VCWWD-1 anticipates that construction of the diversion facilities could be completed in a single phase by the end of 2027. However, it does not appear this project would provide significant benefit to the LPV Basin without implementation of a companion project to lower groundwater elevations in the area to provide additional groundwater storage capacity. Therefore, FCGMA recommends that this project not be considered for implementation unless such a companion project is implemented. Alternatively, modeling should be conducted to characterize the volume of recharged water that would remain in the ELPMA. This modeling should include assumptions that are consistent with the GSP and incorporate findings from VCWWD-1 existing studies, including, but not limited to: (i) existing infiltration pond capacity, (ii) estimated infiltration rates (Ulrich et. al, Not Dated), and (iii) the volume of stormflows available for diversion (VCWWD-1, 2020).

Environmental and Permitting

VCWWD-1 anticipates that project implementation will require CEQA and NEPA compliance, with additional permitting and coordination with the California Department of Fish and Wildlife, Regional Water Quality Control Board, Army Corps of Engineers, and VCWPD. Permitting and CEQA/NEPA compliance has not started.

VCWWD-1 does not anticipate that access agreements or land acquisition would be required to implement this project.

Project Complexity

While this project would rely on existing technology, the project is considered moderately complex and would require the construction of diversion facilities, including the construction of pipeline, pumping stations, a fish ladder, and improvements (as necessary) to VCWWD-1's existing percolation ponds. Permitting and design of the fish ladder would be better defined prior to project construction and implementation. Additionally, this project is dependent on implementation of unbuilt projects to provide the full benefits, like the Moorpark Desalter (Project No. 4), that lower groundwater elevations in the Shallow Alluvial Aquifer to provide adequate available storage.

Anticipated Project Lifespan

VCWWD-1 anticipates that this project lifespan could exceed 25 years.

2.2.3.3 Cost and Funding

VCWWD-1 estimates that the capital cost to construct this project is approximately $4,000,000. O&M costs have not been estimated. Because total project costs are not known, and as a stand-alone project would not provide significant benefit to the basin, the water cost is assigned a value of >$3,000 per AF for project scoring. No funding sources to construct this project have been identified by VCWWD-1 other than potential federal or state grants or loans. Therefore, funding would likely need to come from Basin Assessment and/or VCWWD-1 ratepayers.

2.2.3.4 Benefits Relative to Sustainable Groundwater Management

If the full benefits of this project are realized through implementation with a companion project to increase available groundwater storage in the Shallow Alluvial Aquifer in the ELPMA, this project would provide additional recharge to the ELPMA. However, groundwater flow modeling did not predict the northern portion of the ELPMA would benefit from this project as recharge from the Arroyo does not appear to influence this area. However, 2016 through 2022 extractions in the ELPMA averaged approximately 20,500 AFY, which exceeded the 17,900 AFY estimated sustainable yield of the ELPMA (not including the Epworth Gravels Aquifer; FCGMA 2024) by approximately 2,600 AFY.

As a stand-alone project, most if not all, of the captured storm water would likely flow through the LPV Basin and into the downstream Pleasant Valley Basin. Therefore, as a stand-alone project, the Arroyo Las Posas Storm Water Capture and Recharge Project would not be expected to provide significant benefits relative to sustainable groundwater management of the LPV Basin.

2.2.3.5 Additional Project Considerations

Consistency with SGMA and Likelihood of Causing Material Injury or Undesirable Results

Implementation of this project is anticipated to support groundwater level and storage management within the ELPMA and is consistent with Sustainable Groundwater Management in the LPV. If the full benefits of this project are realized, storm flow in the Arroyo Las Posas to the downstream Pleasant Valley Basin may be reduced. Potential impact to the adjacent basin would need to be evaluated in the CEQA analysis.

Collaboration Requirements

Implementation of this project will require coordination between FCGMA and VCWWD-1.

2.2.4 Project 4: Moorpark Desalter

The Moorpark Desalter project consists of construction of a new groundwater desalter facility to be located east of the Moorpark Water Reclamation Facility, along Los Angeles Avenue. The project goals are to improve water quality in the southern portion of the ELPMA and provide an additional source of potable water supply to the LPV. The project aims to achieve these goals by pumping and treating high-TDS groundwater from the 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 groundwater storage within the ELPMA. Preliminary analyses of the project anticipate that the Moorpark Desalter could operate at a maximum sustained rate of 7,600 AFY.

This Project includes: (1) construction of new groundwater extraction wells to pump high-TDS groundwater from the ELPMA, and (2) construction of a desalter facility that would treat the low-quality groundwater prior to incorporation into the VCWWD-1 delivery system. This project would also require construction of an additional pipeline and discharge station to connect the desalter's brine disposal system to CMWD's Salinity Management Pipeline, which discharges brine from various desalters and water treatment plants to the Pacific Ocean. Preliminary analyses for the proposed desalter have been completed and the project is in the planning phase.

This project, along with Project 9, is consistent with the project in the Judgment titled *Constructing desalter(s) to address water quality issues in Arroyo Simi Creek* (Judgment § 5.4.4).

2.2.4.1 Water Supply

VCWWD-1 proposes to extract up to 7,600 AFY from the Shallow Alluvial Aquifer in the ELPMA. The project summary submitted by VCWWD-1 states they likely would request an additional 5,000 AFY of extraction allocation to sustain this rate of pumping to utilize in lieu of purchasing imported water from CMWD. VCWWD-1 conducted preliminary numerical groundwater flow modeling in 2016 to evaluate project feasibility at an extraction rate of 6,270 AFY. Their 2016 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. If the full 2,200 AFY of additional recharge is realized, the project would have a net negative impact on water supply from the ELPMA of 2,200 AFY minus 5,000 AFY of additional pumping or -2,800 AFY.

Project 1, Arroyo-Simi Las Posas Arundo Removal, and Project 3, Arroyo Las Posas Storm Water Capture and Recharge, are dependent upon pumping by the Moorpark Desalter or another project to provide benefit to the ELPMA. Additional modeling would be required to evaluate the effects of the proposed desalter under scenarios that are consistent with those evaluated in the Periodic Evaluation of the GSP and Projects 1 and 3.

2.2.4.2 Timing and Feasibility

Project Phasing and Timing

VCWWD-1 conducted early conceptual design work in 2010 and preliminary groundwater modeling in 2016, but has not submitted documentation of any additional work conducted for the project since 2016. A full feasibility study for this project has not been completed. Because of this, project phasing and timing are not well defined.

Environmental and Permitting

VCWWD-1 anticipates that project implementation will require CEQA and NEPA compliance, but the specific permitting and regulatory requirements to construct and operate the project are not well defined. Additionally, easement or land acquisition requirements to implement this project are not well defined.

Permitting, environmental compliance, and land acquisitions would need to be identified through a feasibility study.

Project Complexity

While this project would not rely on new technology, the project is considered moderately complex and would require the construction of a desalter well field, treatment system, and conveyance infrastructure. The Moorpark Desalter project is dependent upon construction of additional pipeline to connect to the CMWD Salinity Management Pipeline (SMP). VCWWD-1 would need an agreement with CMWD to dispose of brine produced at the desalter via CMWD's SMP. Implementation of this project could provide additional benefits to projects that increase and/or maintain flows in Arroyo Simi-Las Posas by creating additional storage capacity within the Shallow Alluvial Aquifer.

Anticipated Project Lifespan

VCWWD-1 anticipates that this project lifespan could exceed 25 years.

2.2.4.3 Cost and Funding

VCWWD-1 estimates that the capital costs to construct this project are approximately $40,000,000 but has not estimated operation and maintenance costs. Because total project costs are not known the water cost is assigned a value of >$3,000 per AF for project scoring to reflect uncertainty in overall project costs. No outside sources of funding to construct this project have been identified, therefore, this project would need to be funded by Basin Assessment and/or VCWWD-1 ratepayers. A feasibility study including numerical groundwater modeling is needed before project implementation can be considered.

2.2.4.4 Benefits Relative to Sustainable Groundwater Management

Implementation of this project is anticipated to improve groundwater quality by pumping groundwater impacted by salts from the Shallow Alluvial Aquifer in 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. While the degraded water is a concern within the Basin, because groundwater quality in the ELPMA is not directly correlated with groundwater production from the ELPMA, specific concentration minimum thresholds have not been selected for the ELPMA. Instead, until a causal relationship between groundwater quality degradation and groundwater production is established, the minimum thresholds for groundwater quality are the same as the groundwater level minimum thresholds for chronic lowering of groundwater levels (FCGMA 2019).

The project would include extraction wells pumping from the Shallow Alluvial Aquifer by as much 7,600 AFY which is projected to be 5,000 AFY more than VCWWD-1's allocation. VCWWD-1's 2016 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. If the full 2,200 AFY of additional recharge is realized, the project would have a net negative impact on water supply from the ELPMA of 2,200 AFY minus 5,000 AFY of additional pumping or -2,800 AFY.

Project 1, Arroyo-Simi Las Posas Arundo Removal, and Project 3, Arroyo Las Posas Storm Water Capture and Recharge, are dependent upon pumping by the Moorpark Desalter or another project to increase available groundwater storage capacity to provide benefit to the ELPMA. The anticipated impacts to groundwater quality and groundwater elevations have not yet been quantified. Additional modeling would be required to evaluate the effects of the proposed desalter under scenarios that are consistent with those evaluated in the Periodic Evaluation of the GSP and Projects 1 and 3.

2.2.4.5 Additional Project Considerations

Consistency with SGMA and Likelihood of Causing Material Injury or Undesirable Results

As discussed above, the project as proposed may cause a net increase in extraction from the ELPMA of -2,800 AFY without providing a corresponding increase in water supplies as VCWWD-1 proposes to use the produced water in lieu of purchasing imported water from CMWD. The impacts to sustainable groundwater management or potential to cause material injury is presently unknown. A full feasibility study including numerical groundwater modeling and impact analysis would be needed to fully evaluate the potential benefits and impacts of the project before considering proceeding with implementation.

Collaboration Requirements

Implementation of this project will require coordination between FCGMA, VCWWD-1, and CMWD.

2.2.5 Project 5: Arroyo Simi-Las Posas Water Acquisition

The Arroyo Simi–Las Posas Water Acquisition project would involve the purchase or lease of recycled water from the City of Simi Valley (City) (FCGMA 2019). In return, the City would commit to continuing to discharge the water from its shallow dewatering wells and/or the Simi Valley Water Quality Control Plant (SVWQCP) to the Arroyo Simi for downstream recharge to the LPV. The City has indicated that 3,000 AFY of recycled water from the SVWQCP would be available and 1,700 AFY would be available from the dewatering wells (FCGMA 2019). However, due to the riparian use of the water along the Arroyo Simi–Las Posas, an estimated 1,000 to 2,500 AFY of the water may be lost due to plant uptake and evaporation, leaving 2,200 to 3,700 AFY available as surface flow and recharge to the ELPMA, resulting in an estimated decrease of 1,200 AFY in sustainable yield (FCGMA 2021). It should be noted that this project seeks to maintain existing water supplies in the Basin rather than provide new or additional water supply.

This project is consistent with the project in the Judgment titled *Formalizing an agreement with the City of Simi Valley ("City") to maintain up-stream wastewater treatment plant discharges, or treated effluent, into Arroyo Simi Creek, which shall include cooperation with and support of the City, as necessary, in its interactions with the Los Angeles Regional Water Quality Control Board ("LA Waterboard") on this issue of treated effluent discharge into Arroyo Simi Creek* (Judgment § 5.4.5).

2.2.5.1 Water Supply

The 2025 Periodic Evaluation of the GSP evaluated the benefits of maintaining SVWQCP discharges to Arroyo Simi-Las Posas. Results from modeling conducted for the GSP suggest that loss of the recycled water discharges to Arroyo Simi-Las Posas could result in an estimated decrease in the sustainable yield of the ELPMA by approximately 2,200 AFY (FCGMA 2021). The loss could be more if one or more projects are implemented to increase recharge along the Arroyo Las Posas by increasing the available groundwater storage capacity. Reaching an agreement to purchase this water will maintain existing recharge sources that were included in the estimated sustainable yield analyzed in the Periodic Evaluation of the GSP (FCGMA 2024).

2.2.5.2 Timing and Feasibility

Project Phasing and Timing

The project would rely on existing infrastructure and will require negotiation of real property (i.e., recycled water) pricing and availability. Preliminary discussions between FCGMA and the City of Simi Valley occurred in 2021, but formal negotiations have not occurred between Watermaster and the City since the Judgment was entered. While the project could be implemented immediately following the final negotiations, the time required to develop this agreement is not well defined, but it is presumed to require 18 months for this Basin Optimization Plan.

Environmental and Permitting

Discharges of SVWQCP recycled water to Arroyo Simi-Las Posas will need to continue to comply with the City's NPDES permit and related RWQCB water quality regulatory requirements (e.g., TMDL limits).

Additional permitting is not anticipated to be required for this project.

Project Complexity

This project will rely on existing infrastructure and can be implemented once an agreement is developed and finalized between the City and FCGMA.

This project and Project 6, Delivery of Recycled Water to Las Posas Valley Users via Pipeline, both would rely on recycled water produced at the SVWQCP. Because of this, the volume of water available for discharge maintenance to Arroyo Simi Creek will depend on the volume of water delivered to Las Posas Valley users via pipeline if Project 6 is implemented.

Anticipated Project Lifespan

FCGMA anticipates that the lifespan of this project will exceed 25 years.

2.2.5.3 Cost and Funding

While the cost to purchase SVWQCP water from the City is not well defined, FCGMA anticipates that this water will cost less than the $500 per AF evaluation criterion, and that the City will be responsible for Operation and Maintenance of the SVWQCP and its discharge infrastructure. The purchase cost would be funded through Basin Assessment.

2.2.5.4 Benefits Relative to Sustainable Groundwater Management

Surface water infiltration through the bottom of Arroyo Simi–Las Posas is a primary recharge mechanism for the ELPMA. Perennial flow in Arroyo Simi–Las Posas did not begin until the 1970s, when discharges of treated wastewater effluent, and eventually discharge from shallow dewatering wells, began upstream of the ELPMA boundary. These perennial flows resulted in rising groundwater levels throughout the southern part of the ELPMA between 1974 and 2015. The beneficial users of surface water and groundwater in the ELPMA do not have control over the upstream discharges of water to Arroyo Simi–Las Posas, and recharge to the ELPMA would be reduced if those discharges are reduced resulting in a lower sustainable yield. Therefore, purchase of this discharge would provide a measure of security for the users of groundwater and surface water in the ELPMA. Fundamentally, this project would help maintain groundwater elevations in Arroyo Simi–Las Posas and directly addresses the measurable objectives selected for the ELPMA. Additionally, this project would maintain habitat that has developed since SVWQCP discharges upstream of the ELPMA resulted in perennial flow in Arroyo-Simi Las Posas.

2.2.5.5 Additional Project Considerations

Consistency with SGMA and Likelihood of Causing Material Injury or Undesirable Results

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). Continued discharges of SVWQCP recycled effluent to the arroyo are likely to increase these existing high TDS concentrations over time and another project such as a desalter may be necessary to address the TDS.

Collaboration Requirements

Implementation of this project will require coordination between FCGMA and the City of Simi Valley.

2.2.6 Project 6: Delivery of Recycled Water to Las Posas Valley Users via Pipeline

The Delivery of Recycled Water to Las Posas Valley Users via Pipeline project would consist of constructing a pump station and conveyance pipeline, in addition to formalizing an agreement with the City of Simi Valley, to deliver recycled water from the SVWQCP to Las Posas Valley users in lieu of pumping groundwater. An initial study of this project conducted in 2017 identified construction of an 8.6-mile pipeline to Berylwood Heights MWC as the least-cost alternative, with the option of construction of interconnect piping to Zone MWC (CMWD 2017). Delivery to the VCWWD-1 recycled water system was also considered, but the initial study concluded that this option required approximately 300 feet more pumping head and faced then-existing flow constraints through VCWWD-1's system. However, the project has not undergone additional development since the initial study. This project would utilize the same treated effluent as Project 5, Arroyo Simi-Las Posas Water Acquisition, but instead of continuing discharge to the Arroyo Simi-Las Posas for recharge, would deliver the water to one or both mutual water companies via pipeline.

This project is consistent with the project in the Judgment titled *Formalizing an agreement with the City for recycled water deliveries to Las Posas Valley uses via pipeline, which shall include cooperation with and support of the City, as necessary, in its interactions with the LA Waterboard on this issue of recycled water* (Judgment § 5.4.6).

2.2.6.1 Water Supply

In 2017, the City of Simi Valley indicated that approximately 3,000 AFY of recycled water would be available for delivery to Berylwood Heights MWC and potentially Zone MWC. This water is currently being discharged to Arroyo Simi-Las Posas. Additional yield to the ELPMA from this project would be principally based on avoided evapotranspiration resulting from transporting this water via pipeline. Avoided ET loss in the Arroyo Simi-Las Posas for the current SVWQCP discharges are estimated to range from 21% to 53% (see Project 5) resulting in potential additional water supply for Project 6 of approximately 640 to 1,600 AFY. Additional benefit may be realized if the pipeline was constructed to deliver recycled water to VCWWD-1 which pumps in the impacted northern portion of the ELPMA, but that option was not considered cost-effective in the 2017 study (CMWD 2017). The project could additionally benefit Project 1, Arroyo Simi-Las Posas Arundo Removal, and Project 3, Arroyo Las Posas Storm Water Capture and Recharge, if diversion of the 3,000 AFY from the Arroyo Simi-Las Posas results in an increase in

groundwater storage capacity in the ELPMA. It should be noted that approximately 25% of the 3,000 AFY (750 AFY) may be lost to brine disposal if it is determined this water needs to be desalted.

2.2.6.2 Timing and Feasibility

Project Phasing and Timing

Because this project has not been further evaluated since the 2017 study, FCGMA anticipates that this project would be implemented in two phases:

Phase I would consist of a feasibility study to better define the:

- Users who would participate in this project by using recycled water in lieu of groundwater.
- Project benefits and potential impacts.
- Need for companion desalter project.
- Conveyance infrastructure requirements.
- Permitting, land agreements, and environmental compliance requirements.
- Capital and O&M costs.
- Schedule for project construction and maintenance.

FCGMA anticipates that implementation of Phase I could be completed within a 2-year timeframe following commitment of funds for the feasibility study.

Phase II would consist of negotiating easements, environmental compliance and permitting, project construction, and developing agreements between FCGMA, the City of Simi Valley, and the mutual water companies to receive SVWQCP recycled water. The schedule to implement Phase II is not presently well defined and would be determined during the Phase I feasibility study.

Environmental and Permitting

Full implementation of this project would require construction of a pump station and at least 8.6 miles of conveyance infrastructure. Permitting requirements to construct these facilities would be identified through a feasibility study, but CEQA analysis is expected to be required.

Project Complexity

While this project would rely on existing technology, it is considered moderately complex because: (i) project construction may require significant coordination and mitigation to negotiate easements and convey recycled water from the SVWQCP to Berylwood Heights MWC and potentially additionally to Zone MWC, (ii) project construction may require multiple phases, and (iii) project feasibility and operation would depend on the long-term availability, and price, of SVWQCP recycled water. The volume of water available for this project would also depend on the volume of SVWQCP recycled water that is committed to Project 5, Arroyo Simi-Las Posas Water Acquisition. Construction phasing would be identified in the Phase I feasibility study.

While the initial study conducted in 2017 concluded the recycled water may be suitable for agronomic purposes, recipients of the recycled water may be required to construct, operate, and maintain one or more 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 Basin. The need to desalt recycled water prior to use would be characterized in the Phase I feasibility study.

Anticipated Project Lifespan

FCGMA anticipates that the lifespan of this project would exceed 25 years.

2.2.6.3 Cost and Funding

FCGMA estimates that the cost to complete the Phase I feasibility study is approximately $400,000.

The 2017 study estimated costs to construct this project. Assuming that the project would require the construction of a 100 HP pump station and 8.6-miles of 16-inch conveyance pipeline, costs to construct this project were estimated at approximately $17.2 million. Adjusting this by the CPI leads to an estimated capital cost for Phase II of this project of $22.1 million. Assuming:

- O&M costs are equal to 3% of the capital costs;
- The project would provide 3,000 AFY of SVWQCP recycled water to users via pipeline; and
- A 25-year project lifespan

The 2017 study estimated the cost per AF at approximately $1,200 per AF ($1,600 per AF with CPI adjustment) to construct and operate Phase II of this project. However, this cost omits:

- Lost recharge to the basin from taking the water out of Arroyo Simi-Las Posas and delivering it via pipeline.
- Purchase and/or lease water from the City of Simi Valley, which is anticipated to be <$500 per AF, as described in Project 5.
- Construction, operation, and maintenance, of local desalter(s) to treat the recycled water to levels suitable for irrigation and to avoid significant and unreasonable degradation of water quality, if required.

Project costs may be more than estimated in the 2017 study and should be evaluated in a feasibility study. No funding other than from Basin Assessment has been identified for either the capital or O&M costs.

2.2.6.4 Benefits Relative to Sustainable Groundwater Management

This project would deliver recycled water from the SVWQCP directly to Berylwood Heights MWC (and potentially Zone MWC) in lieu of pumping rather than discharge into the Arroyo Simi-Las Posas for recharge in the ELPMA. The principal benefit to sustainable groundwater management would be reducing ET losses estimated at approximately 640 to 1,600 AFY if 3,000 AFY is diverted from discharge to the Arroyo and delivered directly by pipeline. Additional benefit could be realized if the recycled water was delivered to the impacted northern portion of the ELPMA which does not appear to receive recharge from the Arroyo; however, Berylwood Heights MWC's wells extract groundwater in the western portion of the ELPMA where groundwater elevations are typically above the minimum thresholds and measurable objectives. VCWWD-1 does pump from the northern portion of the ELPMA, however, the 2017 study concluded that delivering this water to VCWWD-1 would not be cost effective. This could be reevaluated in a feasibility study.

2.2.6.5 Additional Project Considerations

Consistency with SGMA and Likelihood of Causing Material Injury or Undesirable Results

There are two potential concerns associated with this project. The first is that significant habitat has developed in the Arroyo Simi-Las Posas since discharges from the SVWQCP created perineal flows in the Arroyo starting in the 1970s. While not expected to cause an undesirable result because the habitat is supported by surface water not believed to be interconnected with groundwater, the impacts of decreasing discharges to the Arroyo by 3,000 AFY would need to be evaluated in a feasibility study and CEQA analysis.

Second, the tertiary treated effluent contains elevated concentrations of TDS, chloride, sulfate, and other constituents. Groundwater in some wells monitored in the area of the basin where Berylwood Heights MWC operates have elevated concentrations of TDS, chloride, and sulfate. The potential impact to groundwater quality due to use of recycled water delivered by pipeline from the SVWQCP would need to be evaluated in a feasibility study.

Collaboration Requirements

Implementation of this project would require coordination between FCGMA, the City of Simi Valley, RWQCB, and Las Posas Valley users able to receive and use SVWQCP recycled water in lieu of groundwater.

2.2.7 Project 7: In Lieu Deliveries to Northern East Las Posas Feasibility Study

This project seeks to evaluate the feasibility of providing supplemental water supplies to the northern area of the ELPMA in lieu of groundwater extraction. The GSP identified the area of the ELPMA north of the Moorpark anticline as a region where groundwater elevations have exhibited historical declines that locally exceed 250 feet. Groundwater elevation trends in this part of the ELPMA differ from those measured in the southern portion of the ELPMA, where groundwater elevations have experienced periods of recovery in response to increasing flow in Arroyo Simi-Las Posas. Groundwater elevations north of the Moorpark anticline are less responsive to flows in Arroyo Simi-Las Posas and are primarily influenced by groundwater production and CMWD's Aquifer Storage and Recovery (ASR) operations. Supplemental water supplies to this area will reduce groundwater demand in this part of the ELPMA.

While Project 2, Purchase of Imported Water from CMWD for Basin Replenishment, would deliver surface water to VCWWD-1 in lieu of pumping in the northern ELPMA utilizing existing infrastructure, a similar program in operation between 1995 and 2007 did not fully mitigate the long-term groundwater decline. The feasibility study would utilize groundwater modeling to evaluate the volume and location of supplemental supplies needed to fully mitigate groundwater declines in the northern ELPMA, investigate sources of supplemental water, identify additional infrastructure or infrastructure upgrades needed to deliver supplemental water, and estimate capital and operation-and-maintenance costs to construct and implement the project.

This project is consistent with the project in the Judgment titled *Designing and constructing new or modified infrastructure in order to deliver In Lieu Water to water deficit areas for Use in lieu of Extracted Groundwater and to increase water conveyance within the Basin* (Judgment § 5.4.7).

2.2.7.1 Water Supply

This project is for a feasibility study. Preliminary modeling has been conducted, but a feasibility study needs to be completed to identify infrastructure needs, waters supply availability, and Las Posas Valley users in the northern ELPMA willingness to use a supplemental source of water in lieu water of groundwater. CMWD implemented an in-lieu program in late 1995 through early 2007. During this 11.5-year program, CMWD delivered an average of 1,380 AFY to VCWWD-1 in lieu of pumping. Project 2 would initiate a similar program. While beneficial, the 2005 through 2007 program was insufficient to fully mitigate groundwater declines in this area. The feasibility study would utilize groundwater modeling to evaluate the volume and location of additional supplemental water needed to fully mitigate groundwater declines.

2.2.7.2 Timing and Feasibility

Project Phasing and Timing

This project would be conducted in two phases. The first phase would be to develop the scope of work and request for proposal for the feasibility study with Committee Consultation. The second phase would be preparation of the feasibility study. It is anticipated that the project can be completed within a 2-year timeframe following commitment of funds for the project. If a feasible project is identified through this study, timetables for permitting, construction, and project implementation would be developed.

Environmental and Permitting

The feasibility study would identify additional pipelines and other facilities or upgrades that may be needed to deliver additional supplemental water supplies to expand the in-lieu program. The feasibility study would identify the environmental compliance and permits that would be required.

Project Complexity

Project complexity is presently not known. If the feasibility study finds that the project should be expanded with construction of additional pipelines and other facilities, then the implementation project may be moderately complex including the need for easements from property owners.

Anticipated Project Lifespan

Similar to Project 2, Purchase of Imported Water from CMWD for Basin Replenishment, project lifespan could exceed 50 years.

2.2.7.3 Cost and Funding

FCGMA anticipates that the feasibility study can be completed for approximately $150,000. Capital cost, water and other operation-and-maintenance costs, would be identified in the feasibility study. A water cost of >$3,000 per AF was used in for scoring to reflect uncertainty in the final project pricing. The feasibility study would be funded through Basin Assessment.

2.2.7.4 Benefits Relative to Sustainable Groundwater Management

This feasibility study is expected to provide a clear understanding of volume of supplemental water supplies, and corresponding piping infrastructure, required to offset groundwater demands and maintain groundwater elevations above the minimum thresholds in the northern portion of the ELPMA. Mitigating the long-term groundwater declines in this area would address projected future declines below the minimum thresholds and potentially increase the sustainable yield of the ELPMA.

2.2.7.5 Additional Project Considerations

Consistency with SGMA and Likelihood of Causing Material Injury or Undesirable Results

In addition, this feasibility study would provide stakeholders with estimated costs associated with the supplemental water deliveries and corresponding infrastructure requirements and would also provide stakeholders with an estimate of the potential increase to the sustainable yield of the ELPMA.

Collaboration Requirements

This feasibility study may require coordination with mutual water companies and/or water purveyors whose service area extends north of the Moorpark anticline to identify entities that are able to supply, or receive and deliver, supplemental water supplies to offset groundwater extractions.

2.2.8 Project 8: Allocation Buyback and Reduction Program

This project seeks to develop a program for the least cost acquisition of Allocation Basis, Annual Allocation, and/or Carryover, as an alternative to Basin replenishment and/or Rampdown. This would include, but may not be limited to:

- Develop program scope and policies, including potential prioritization of purchases from water deficit areas of the LPV Basin.
- Engage a consultant to help develop the process for least-cost allocation acquisition and transaction mechanics.
- Implement a pilot program.
- Expand to the full program for temporary allocation (Annual Allocation and Carryover).
- Evaluate the potential to expand the program to permanent allocation (Allocation Basis) including engaging consultant(s) to study potential economic and environmental impacts of permanent assessment purchase.

This project is consistent with the project in the Judgment titled *Developing a program for the least cost acquisition of Allocation Basis or Annual Allocations, or Carryover as an alternative to Replenishment* (Judgment § 5.4.8).

2.2.8.1 Water Supply

This project would develop the policies and rules for a least-cost Allocation Buyback and Reduction Program. The Allocation Buyback and Reduction Program would be a demand-reduction program to purchase long-term (Allocation Basis) and/or short-term (Annual Allocation and/or Carryover) allocation to reduce groundwater

extractions. The program would be scalable and limited only by the amount of Basin Assessment allocated to the program and Water Right Holders' willingness to sell Annual Allocation, Allocation Basis, or Carryover.

2.2.8.2 Timing and Feasibility

Project Phasing and Timing

This project would be conducted in three phases. The first phase would be to develop the scope and policy framework for approval by the Watermaster Board in consultation with the PAC and TAC. Policy framework may include prioritization of allocation acquisition from water deficit areas, and the scope and projected budgeting for allocation purchases. The first phase would include engaging a consultant to help develop the transaction mechanics for purchasing allocation, such as a reverse auction. The second phase would be to implement a pilot program. The third phase would be to expand into full program to purchase Annual Allocation and Carryover. Additional study may be conducted during the third phase such as the potential economic and environmental impacts of expanding the program to purchase of permanent Allocation Basis. It is projected that the first phase could be completed in approximately 18 months. The second phase pilot program is projected to be conducted for one water year, expanding to the full program for purchase of temporary allocation in the second water year.

Environmental and Permitting

The first phase of project development and the second phase pilot test would not require permitting and/or environmental compliance. Identification of potential environmental compliance needed for implementation of phase 3 full program implementation would be identified during the first two phases.

Project Complexity

FCGMA anticipates that the development of this program will be moderately complex and will require development of a framework to ensure that water costs, acquisition timing, and acquisition preference / locale are appropriately defined. This will require policy development by the Watermaster Board in consultation with PAC and TAC and input from Water Right Holders. This project is not dependent on other projects.

Anticipated Project Lifespan

FCGMA anticipates that the Program developed through this project would have a lifespan that exceeds 25 years. However, this Program should be re-evaluated at a 5-year frequency to ensure that water costs and priority areas are appropriately reflected in the Program.

2.2.8.3 Cost and Funding

FCGMA estimates that development of the transaction mechanics may cost approximately $160,000, not including Watermaster administration costs. A one-year pilot program is estimated at $100,000 in consultant costs, not including Watermaster administration costs. Annual costs to implement the full program would be better understood following the pilot program. A range of >$500 to <$1,000 per AF was assumed for purposes of project scoring. Both the Program development and implementation would be funded by Basin Assessment.

2.2.8.4 Benefits Relative to Sustainable Groundwater Management

The Allocation Buyback and Reduction Program would provide additional flexibility in sustainably managing the Basin by providing a program to acquire and retire pumping allocation to reduce groundwater extraction in the Basin. By incentivizing pumping reduction in areas of the Basin with declining groundwater elevations and/or elevations below minimum thresholds and measurable objectives, especially in the eastern portion of the WLPMA and the northern portion of the ELPMA, the program would help to address potential undesirable results due to chronic lowering of groundwater levels or decreases in groundwater storage.

2.2.8.5 Additional Project Considerations

Consistency with SGMA and Likelihood of Causing Material Injury or Undesirable Results

Implementation of the resulting program is anticipated to support groundwater level stabilization in water deficit areas of the LPV and maintain groundwater elevations above the minimum thresholds, thereby improving groundwater level and storage management. Implementation of the resulting program is not anticipated to result in undesirable results or Material Injury that cannot be mitigated.

Collaboration Requirements

Implementation of this project will require coordination between FCGMA and the PAC and TAC to develop program policies and scope.

2.2.9 Project 9: Regional Desalter Feasibility Study

The Regional Desalter Feasibility Study project would be to evaluate the feasibility of constructing and operating a regional groundwater desalter in the ELPMA as an alternative to the Project 4, Moorpark Desalter, project. In addition to removing groundwater impacted by salts in the ELPMA, a completed desalter project would provide high-quality water and extraction wells could create additional groundwater storage capacity in the Shallow Alluvial Aquifer. Unlike the Project 4 Moorpark Desalter which envisions increasing extraction in the ELPMA by 5,000 AFY, the preliminary concept for the regional desalter is that the produced water would be utilized by recipients in lieu of extraction. The scope of the Regional Desalter Feasibility Study is outlined in section 2.2.9.2.

This project, along with Project 4, is consistent with the project in the Judgment titled *Constructing desalter(s) to address water quality issues in Arroyo Simi Creek* (Judgment § 5.4.4).

2.2.9.1 Water Supply

The water supply benefits of a regional desalter would be evaluated in the feasibility study, but are presumed to be ≤2,500 to <5,000 AFY for evaluation purposes. Potential benefits include a supply of high-quality water to utilize in lieu of groundwater extraction. Additionally, the project would create increased groundwater storage capacity for storing additional Arroyo Simi-Las Posas flows through projects such as Project 1, Arroyo Simi-Las Posas Arundo Removal, Project 3, Arroyo Las Posas Storm Water Capture and Recharge, and other projects that may be identified.

2.2.9.2 Timing and Feasibility

Project Phasing and Timing

Design, permitting, and construction of a regional desalter would reasonably be estimated to require at least ten years. The Regional Desalter Feasibility Study project would be conducted in two phases. The first phase would include engagement of water purveyors to establish interest in studying a desalter project, establishing the scope of the feasibility study, developing the groundwater modeling scenarios, and engaging a consultant. The first phase is estimated to require about 12 months. The second phase would be to conduct numerical groundwater modeling and the feasibility study. The second phase is estimated to require 18 months. The project would include the following tasks:

- Engagement of water purveyors in the ELPMA including CMWD, VCWWD-1, mutual water companies, and other public entities including FCGMA that may be identified, to establish the level of interest in constructing and operating a regional desalter through a joint powers authority (JPA) or other appropriate means.
- Development of feasibility scope including modeling scenarios.
- Numerical groundwater modeling to evaluate preferred options for number options for new groundwater extraction wells to pump groundwater with elevated TDS from the Shallow Alluvial Aquifer in the ELPMA, including extraction rate, number of wells, and well locations.
- Evaluation of potential benefits and impacts to sustainable groundwater management of the Basin.
- Options for location and sizing of a desalter and associated product-water piping, pumping stations if needed, and piping and discharge station to connect to CMWD's SMP.
- Evaluation of the environmental compliance, permitting, and land acquisition and/or easement, requirements.
- Preliminary analysis of project design phases and schedule.
- Preliminary cost estimates for the project including design, construction, operation-and-maintenance, and per acre-foot cost of produced water.
- Identification of potential funding and financing mechanisms such as the State Revolving Fund.
- Project would include stakeholder engagement via the PAC and TAC at key points throughout the feasibility study.

Environmental and Permitting

Permitting, environmental compliance, and land acquisitions and/or easements needed for implementation, would be identified as part of the feasibility study.

Project Complexity

While this project would not rely on new technology, the Regional Desalter project is considered moderately complex and would require the construction of a desalter well field, treatment system, product water conveyance infrastructure, brine disposal connection to CMWD's SMP, and likely fairly complex environmental compliance and permitting requirements. Specific requirements would be evaluated as part of the feasibility study.

Anticipated Project Lifespan

Desalter projects and appurtenances generally have lifespans exceeding 25 years.

2.2.9.3 Cost and Funding

A regional desalter project would be a very expensive project. VCWWD-1 estimated the capital cost to construct the Project 4 Moorpark Desalter at $40,000,000. Design, construction, and operation-and-maintenance, costs would be estimated as part of the feasibility study, which would also identify potential funding and financing opportunities. For purposes of project scoring, total water costs were assumed to be >$3,000 per AF to reflect uncertainty. Absent identification of grant opportunities, costs would need to be funded through Basin Assessment.

The cost for the Regional Desalter Feasibility Study is estimated at $300,000 which would be funded through Basin Assessment.

2.2.9.4 Benefits Relative to Sustainable Groundwater Management

While the potential sustainable groundwater management benefits and impacts would be evaluated as part of the feasibility study, implementation of a regional desalter project would improve the water supplies in the ELPMA and improve ability to sustainably manage the ELPMA in terms of groundwater elevations and groundwater in storage. It would do this in two ways: first by providing high-quality product water to users in lieu of groundwater pumping, which could be especially beneficial if delivered to the northern portion of the ELPMA; and second by creating additional groundwater storage capacity in the Shallow Alluvial Aquifer along the Arroyo Simi-Las Posas which would induce additional recharge from flows in the Arroyo and from projects such as Project 1 Arundo Removal and Project 3 Storm Water Capture and Recharge.

Additionally, implementation of this project is anticipated to improve groundwater quality by pumping groundwater impacted by salts from the Shallow Alluvial Aquifer in the southern portion of the ELPMA, which has been impacted by degraded water quality resulting from surface water recharge originating from outside the LPV Basin boundaries. While the degraded water is a concern within the LPV Basin, because groundwater quality in the ELPMA is not directly correlated with groundwater production from the ELPMA, specific concentration minimum thresholds have not been selected for the ELPMA. Instead, until a causal relationship between groundwater quality degradation and groundwater production is established, the minimum thresholds for groundwater quality are the same as the groundwater level minimum thresholds for chronic lowering of groundwater levels (FCGMA 2019).

2.2.9.5 Additional Project Considerations

Consistency with SGMA and Likelihood of Causing Material Injury or Undesirable Results

The feasibility study would evaluate the project for consistency with SGMA and potential of causing Material Injury or Undesirable results. However, it is anticipated that the conceptual regional desalter project would be consistent with sustainable groundwater management and would be expected to address potential results and not cause Material Injury.

Collaboration Requirements

Preparation of the Regional Desalter Feasibility Study would require coordination with FCGMA, CMWD, VCWWD-1, mutual water companies, stakeholders, and others who may be identified.

2.3 Project Ranking & Prioritization

The nine projects identified in Table 1 and evaluated in Section 2.2 of this Basin Optimization Plan were scored and ranked in accordance with the project identification criteria described in Section 2.1. Project ranking is summarized in Table 3. A detailed description of each project's scoring is included in Appendix B, Project Ranking Sheets. It should be noted that although a project may not have been selected for inclusion in this Basin Optimization Plan, projects can be added to the Basin Optimization Plan: *"any additional projects to be included in the Basin Optimization Plan, or any amendment thereto, must satisfy the criteria established under Section 5.3.2.1 as determined in Watermaster's discretion, subject to Committee Consultation"* (Judgment § 5.3.2.2).

2.3.1 Projects Selected for Basin Optimization Plan

Based on the evaluation and ranking, projects were selected for inclusion in the Basin Optimization Plan "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). The following three projects and two feasibility studies were selected for inclusion in the Basin Optimization Plan as summarized in Table 3 and discussed below.

2.3.1.1 Project 2: Purchase of Imported Water from CMWD for Basin Replenishment

Project 2, Purchase of Imported Water from CMWD for Basin Replenishment, was the highest scoring project and is ranked at priority 1 (see Table 3). Details of the evaluation of this project are in Section 2.2.2. This project can be implemented relatively quickly and will supply in-lieu imported water to the two most water-deficient areas of the LPV Basin, the eastern portion of the WLPMA and the northern portion of the ELPMA, utilizing existing infrastructure. Implementation of this project can be quantified for inclusion in the Basin Optimization Yield Study groundwater modeling based on the historical program which supplied an average of 1,760 AFY to the WLPMA and 1,380 AFY in the ELPMA.

2.3.1.2 Project 5: Arroyo Simi-Las Posas Water Acquisition

Project 5, Arroyo Simi-Las Posas Water Acquisition, was the second highest scoring project and is ranked at priority 2 (see Table 3). Details of the evaluation of this project are in Section 2.2.5. This project will ensure continued discharges from the SVWQCP to the Arroyo Simi-Las Posas which provide groundwater recharge to the ELPMA. Previous modeling suggested that loss of the recycled water discharges could result in a decrease in the sustainable yield of the ELPMA by approximately 2,200 AFY. This project does not require new infrastructure but requires negotiation of an agreement with the City of Simi Valley. Implementation of this project can be quantified for inclusion in the Basin Optimization Yield Study groundwater modeling by maintaining discharges from the SVWQCP to the Arroyo Simi-Las Posas.

2.3.1.3 Project 8: Allocation Buyback and Reduction Program

Project 8, Allocation Buyback and Reduction Program, was the third highest scoring project and is ranked at priority 3 (see Table 3). Details of the evaluation of this project are in Section 2.2.8. This project will reduce pumping in the Basin by purchasing and retiring allocation including Allocation Basis, Annual Allocation, and/or Carryover. The Allocation Buyback and Reduction Program does not require new infrastructure and can be implemented relatively quickly following development of the program policy framework and allocation of funding. This project is scalable and limited only by the amount of Basin Assessment allocated to the program and Water Right Holders' willingness to sell allocation. Implementation of this project cannot be quantified for inclusion in the Basin Optimization Yield Study groundwater modeling until the Watermaster Board defines the program policies, funding, and quantity of allocation to be purchased.

2.3.1.4 Project 7: In Lieu Deliveries to Northern East Las Posas Feasibility Study

Project 7, In Lieu Deliveries to Northern East Las Posas Feasibility Study, was the fourth highest scoring project and is ranked at priority 4 (see Table 3). Details of the evaluation of this project are in Section 2.2.7. This feasibility study will evaluate the volume and location of supplemental supplies needed to fully mitigate groundwater declines in the northern ELPMA, investigate sources of supplemental water, and identify additional infrastructure or infrastructure upgrades needed to deliver supplemental water. The feasibility study will provide estimated benefits of the project and therefore it cannot be quantified for inclusion in the Basin Optimization Yield Study groundwater modeling.

2.3.1.5 Project 9: Regional Desalter Feasibility Study

Project 9, Regional Desalter Feasibility Study, was the fifth highest scoring project and is ranked at priority 5 (see Table 3). Details of the evaluation of this project are in Section 2.2.9. This project was selected for the Basin Optimization Plan because several of the evaluated candidate projects are dependent on implementation of a desalter and associated groundwater extraction wells. It is not known whether a desalter will be cost-effective, which the feasibility study will determine. Because design, permitting, financing, and construction of a desalter would be expected to take at least ten years, a feasibility study should be conducted expeditiously to determine whether it is a viable water-supply project. A regional desalter would be an alternative to Project 4, Moorpark Desalter, which was the lowest-scoring project evaluated as presently scoped. Project 9 will not be included in the Basin Optimization Yield Study groundwater modeling as the feasibility of the project will not be known nor can the potential benefits be quantified until the feasibility study is completed.

2.3.2 Projects Not Selected for Basin Optimization Plan

Four projects were not selected for inclusion in the Basin Optimization Plan based on the evaluation and ranking. These projects were found not "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). Projects not selected for inclusion in the Basin Optimization Plan will not be included in Basin Optimization Yield Study groundwater modeling. As discussed above, non-selected projects can be considered for subsequent addition to the Basin Optimization Plan if additional studies or information provide the basis for feasibility and higher ranking.

2.3.2.1 Project 6: Delivery of Recycled Water to Las Posas Valley Users via Pipeline

Details of the evaluation of Project 6, Delivery of Recycled Water to Las Posas Valley Users via Pipeline, are in Section 2.2.6. This project was not selected for inclusion in the Basin Optimization Plan because it would be a moderately complex project that would provide limited benefits and could require one or more desalters to address potential water-quality concerns which would significantly increase the costs.

2.3.2.2 Project 1: Arroyo Simi-Las Posas Arundo Removal

Project 1, Arroyo Simi-Las Posas Arundo Removal, was not selected for inclusion in the Basin Optimization Plan because it requires a companion project such as Project 4, Moorpark Desalter, or Project 9, Regional Desalter, to provide significant benefits to the LPV Basin. Groundwater modeling suggests that the majority of additional flows provided to the Arroyo by implementation of this project would flow into the downstream Pleasant Valley Basin unless a project creates additional groundwater storage capacity in the Shallow Alluvial Aquifer. As a standalone project, this project is unlikely to provide significant benefit to the LPV Basin. Details of the evaluation of this project are in Section 2.2.1.

2.3.2.3 Project 3: Arroyo Las Posas Storm Water Capture and Recharge

Project 3, Arroyo Las Posas storm water capture and recharge, was not selected for inclusion in the Basin Optimization Plan because it requires a companion project such as Project 4, Moorpark Desalter, or Project 9, Regional Desalter, to provide benefits to the LPV Basin. Groundwater modeling suggests some, if not all of the water diverted to the recharge ponds, is likely to flow back into Arroyo Las Posas and downstream into the Pleasant Valley Basin unless a project creates additional groundwater storage capacity in the Shallow Alluvial Aquifer. As a standalone project, this project is unlikely to provide significant benefit to the LPV Basin. Details of the evaluation of this project are in Section 2.2.3.

2.3.2.4 Project 4: Moorpark Desalter

Project 4, Moorpark Desalter, was not selected for inclusion in the Basin Optimization Plan because it would be a very expensive project that would have an estimated negative impact of -2,800 AFY on groundwater supply in the ELPMA, as currently scoped. This negative impact occurs because the VCWWD-1's conceptual project description would increase pumping by 5,000 AFY and product water would be used in lieu of purchasing imported water. Details of the evaluation of this project are in Section 2.2.4.

Table 3. Summary of Project Score & Rank

Project No.	Project Title	Summary of Scoring							
		Rank	Total Score (170 Max)	Water Supply Benefit (50 Max)	Timing / Feasibility (50 Max)	Cost (50 Max)	Impacts on Sustainability Indicators (20 Max)	Selected for Basin Optimization Plan	Include in BOYS Modeling
2	Purchase of Imported Water from CWMD for Basin Replenishment	1	121	25	50	26	15	Yes	Yes
5	Arroyo Simi-Las Posas Water Acquisition	2	94	30	27	22	15	Yes	Yes
8	Allocation Buyback and Reduction Program	3	92	15	45	17	15	Yes	No
7	In Lieu Deliveries to Northern ELPMA Feasibility Study	4	64	20	26	3	15	Yes	No
9	Regional Desalter Feasibility Study	5	55	20	17	3	15	Yes	No
6	Delivery of Recycled Water to Las Posas Users via Pipeline	6	54	15	17	12	10	No	No
1	Arroyo Simi Las Posas Arundo Removal	7	52	10	34	3	5	No	No
3	Arroyo Las Posas Storm Water Capture and Recharge	8	47	10	29	3	5	No	No
4	Moorpark Desalter	9	41	20	17	3	1	No	No

Note: BOYS = Basin Optimization Yield Study.

3 Basin Optimization Project Implementation

This section describes the five-year plan for implementing the five selected Basin Optimization Projects. The five-year plan presumes that budget will have been allocated to begin implementation activities in the first quarter of fiscal year 2025-26, beginning in July 2025. Five-year schedules for each Basin Optimization Project are included in Appendix C. A Gannt chart of the schedule to implement the selected Basin Optimization Projects is included as Appendix D. The five-year plan and schedule are estimated projections and are subject to Watermaster Board approval.

FY 2025-26 (7/1/2025 – 9/30/2025)

Q1 (7/1/2025 – 9/30/2025)

- Initial project implementation planning following Watermaster Board approval of the Basin Optimization Plan

Q2 (10/1/2025 – 12/31/2025)

- Project 2: Purchase of Imported Water from CMWD for Basin Replenishment
  - Begin development of program policy
  - Work with VCWWD-1, VCWWD-19, and Zone MWC to determine pumping costs to inform amount of incentive needed and projected annual volume of in-lieu deliveries
  - Meet with CMWD to confirm availability and cost of imported water for the program
- Project 5: Arroyo Simi-Las Posas Water Acquisition
  - Initiate discussions/negotiations for purchase or lease agreement with City of Simi Valley (real-property, Board closed session)
- Project 8: Allocation Buyback and Reduction Program
  - Begin development of program scope and policy
- Project 7: In Lieu Deliveries to Northern East Las Posas Feasibility Study
  - Develop feasibility study scope of work with PAC/TAC consultation
- Project 9: Regional Desalter Feasibility Study
  - Engage water purveyors in the ELPMA to establish interest in desalter

Q3 (1/1/2026 – 3/31/2026)

- Project 2: Purchase of Imported Water from CMWD for Basin Replenishment
  - Initial analysis of Watermaster Budget and Basin Assessment needed to fund program
  - PAC/TAC consultation on draft policy and incentive
- Project 5: Arroyo Simi-Las Posas Water Acquisition
  - Continued negotiations for purchase or lease agreement with City of Simi Valley (real-property, Board closed session)
- Project 8: Allocation Buyback and Reduction Program
  - Draft program scope and policy discussed at Executive Committee

    - PAC/TAC consultation on draft scope and policy
- Project 7: In Lieu Deliveries to Northern East Las Posas Feasibility Study
    - Request for Proposals (RFP) for consultant to conduct feasibility study
- Project 9: Regional Desalter Feasibility Study
    - Develop feasibility scope including modeling scenarios
    - PAC/TAC consultation

Q4 (4/1/2026 – 6/30/2026)

- Project 2: Purchase of Imported Water from CMWD for Basin Replenishment
    - Develop incentive agreements including reporting requirements
    - Watermaster Budget and Basin Assessment review by Fiscal Committee, Committee Consultation
    - Finalize program policy and incentive amount; adoption by Watermaster Board
- Project 5: Arroyo Simi-Las Posas Water Acquisition
    - Continued negotiations for purchase or lease of agreement with City of Simi Valley (real property, Board closed session)
- Project 8: Allocation Buyback and Reduction Program
    - RFP and engage consultant to assist with development of process for least-cost allocation acquisition and transaction mechanics
- Project 7: In Lieu Deliveries to Northern East Las Posas Feasibility Study
    - Watermaster Board award of contract for feasibility study
- Project 9: Regional Desalter Feasibility Study
    - RFP for consultant to conduct feasibility study

FY 2026-27 (7/1/2026 – 6/30/2027)

- Project 2: Purchase of Imported Water from CMWD for Basin Replenishment
    - Program implementation
- Project 5: Arroyo Simi-Las Posas Water Acquisition
    - Continued negotiations for purchase or lease of agreement with City of Simi Valley (real property, Board closed session)
    - PAC/TAC consultation
    - Watermaster Budget and Basin Assessment review by Fiscal Committee, Committee Consultation, and Watermaster Board adoption
    - Finalize draft purchase or lease agreement with City of Simi Valley (real property, Board closed session)
    - Board execution of final agreement
    - Program implementation
- Project 8: Allocation Buyback and Reduction Program
    - Consultant assisting with development of process for least-cost allocation acquisition and transaction mechanics
    - Consultant report on proposed transaction mechanics
    - Executive Committee review of draft program
    - Analysis of Watermaster Budget and Basin Assessment needed to fund pilot program

    - Fiscal Committee review of Watermaster Budget and Basin Assessment needed to fund pilot program
    - Watermaster Board approval of draft pilot program with PAC/TAC consultation as appropriate
- Project 7: In Lieu Deliveries to Northern East Las Posas Feasibility Study
    - Feasibility study underway
- Project 9: Regional Desalter Feasibility Study
    - Watermaster Board award of contract for feasibility study
    - Feasibility study underway

FY 2027-28 (7/1/2027 – 6/30/2028)

- Project 2: Purchase of Imported Water from CMWD for Basin Replenishment
    - First-year program review report to Watermaster Board
    - Ongoing program implementation
- Project 5: Arroyo Simi-Las Posas Water Acquisition
    - Ongoing program implementation
- Project 8: Allocation Buyback and Reduction Program
    - Pilot program beginning in Water Year[7] 2028 (10/1/2027 – 9/30/2028)
- Project 7: In Lieu Deliveries to Northern East Las Posas Feasibility Study
    - Draft feasibility study
    - PAC/TAC consultation
    - Watermaster Board review
    - Final feasibility study
- Project 9: Regional Desalter Feasibility Study
    - Draft feasibility study
    - PAC/TAC consultation
    - Watermaster Board review
    - Final feasibility study

FY 2028-29 (7/1/2028 – 6/30/2029)

- Project 2: Purchase of Imported Water from CMWD for Basin Replenishment
    - Ongoing program implementation
- Project 5: Arroyo Simi-Las Posas Water Acquisition
    - Ongoing program implementation
- Project 8: Allocation Buyback and Reduction Program
    - Pilot program during Water Year 2028 (10/1/2027 – 9/30/2028)
    - Review of pilot program
    - Expand to full program for temporary allocation (Annual Allocation and Carryover) starting Water Year 2029 (10/1/2028 – 9/30/2029)

[7] A water year begins October 1 and ends September 30 to reflect the precipitation patterns in California. Under DWR's definition of a water year, water year 2028 begins October 1, 2027, and ends September 30, 2028. Under the Judgment adopted in the LPVB adjudication (Las Posas Valley Water Rights Coalition, et al. v. Fox Canyon Groundwater Management Agency, Santa Barbara Sup. Ct. Case No. VENC100509700) water year 2028 begins on October 1, 2028, and ends on September 30, 2029. This document adopts DWR's naming convention for a water year.

    - PAC/TAC consultation
- Project 7: In Lieu Deliveries to Northern East Las Posas Feasibility Study
    - To be determined based on results of feasibility study
- Project 9: Regional Desalter Feasibility Study
    - To be determined based on results of feasibility study

FY 2029-30 (7/1/2029 – 6/30/2030)

- Project 2: Purchase of Imported Water from CMWD for Basin Replenishment
    - Ongoing program implementation
- Project 5: Arroyo Simi-Las Posas Water Acquisition
    - Ongoing program implementation
- Project 8: Allocation Buyback and Reduction Program
    - Ongoing program implementation for Annual Allocation and Carryover
    - Evaluate potential to expand program to permanent allocation (Allocation Basis)
    - Potential RFP to contract consultant(s) to study economic and environmental impacts of permanent allocation purchase
- Project 7: In Lieu Deliveries to Northern East Las Posas Feasibility Study
    - To be determined based on results of feasibility study
- Project 9: Regional Desalter Feasibility Study
    - To be determined based on results of feasibility study

4 5-Year Project Implementation Budget

Estimated costs to implement the five selected Basin Optimization Projects are presented in Appendix E, the 5-Year Basin Optimization Projects Budget. The costs are estimated by fiscal year, broken down into quarterly estimates of project/program development, implementation, feasibility study, and Watermaster administration costs, as applicable to each project. Assumptions used for the 5-year budget are included as footnotes to the table in Appendix E. The 5-year budget assumes project development beginning in the first quarter of Fiscal Year 2025-26, which begins July 2025. Because the scope of most of the projects will not be fully defined until the first phase of project/program development, the projected 5-year budget is an order-of-magnitude projection that can be refined once the projects/programs are better defined. The 5-year budget to fund the Basin Optimization Projects is subject to Watermaster Board approval following Committee Consultation. No outside funding has been identified for the selected Basin Optimization Projects and the 5-year project implementation budget would need to be funded through Basin Assessment. Following is a summary of the estimated 5-year budget.

FY 2025-26 ..... $436,000
- Project 2: Purchase of Imported Water from CMWD $60,000
- Project 5: Arroyo Simi-Las Posas Water Acquisition $100,000
- Project 8: Allocation Buyback and Reduction Program $130,000
- Project 7: In Lieu Deliveries to Northern ELPMA Feasibility Study $86,000
- Project 9: Regional Desalter Feasibility Study $60,000

FY 2026-27 ..... $5,707,600
- Project 2: Purchase of Imported Water from CMWD $4,628,600
- Project 5: Arroyo Simi-Las Posas Water Acquisition $510,000
- Project 8: Allocation Buyback and Reduction Program $245,000
- Project 7: In Lieu Deliveries to Northern ELPMA Feasibility Study $112,000
- Project 9: Regional Desalter Feasibility Study $212,000

FY 2027-28 ..... $6,100,600
- Project 2: Purchase of Imported Water from CMWD $5,059,600
- Project 5: Arroyo Simi-Las Posas Water Acquisition $510,000
- Project 8: Allocation Buyback and Reduction Program $425,000
- Project 7: In Lieu Deliveries to Northern ELPMA Feasibility Study $0
- Project 9: Regional Desalter Feasibility Study $106,000

FY 2028-29 ..... $7,130,800
- Project 2: Purchase of Imported Water from CMWD $5,520,800
- Project 5: Arroyo Simi-Las Posas Water Acquisition $510,000
- Project 8: Allocation Buyback and Reduction Program $1,100,000
- Project 7: In Lieu Deliveries to Northern ELPMA Feasibility Study $0
- Project 9: Regional Desalter Feasibility Study $0

FY 2029-30 ..... $7,624,400
- Project 2: Purchase of Imported Water from CMWD $6,014,400
- Project 5: Arroyo Simi-Las Posas Water Acquisition $510,000
- Project 8: Allocation Buyback and Reduction Program $1,100,000
- Project 7: In Lieu Deliveries to Northern ELPMA Feasibility Study $0
- Project 9: Regional Desalter Feasibility Study $0

5-Year Total Estimated Budget $26,999,400

5 References

Calleguas Municipal Water District (CMWD). 2017. Las Posas Replacement Water Study. Prepared by Kennedy Jenks. August 2017.

Fox Canyon Groundwater Management Agency (FCGMA). 2019. Groundwater Sustainability Plan for the Las Posas Valley Basin. January 2019.

Fox Canyon Groundwater Management Agency (FCGMA). 2021. Update on Revised Groundwater Modeling and Updated Future Scenarios and Estimates of Sustainable Yield for the East Las Posas Management Area. October 27, 2021, FCGMA Board meeting.

Fox Canyon Groundwater Management Agency (FCGMA). 2024. First Periodic Evaluation: Groundwater Sustainability Plan for the Las Posas Valley Basin. December 2024.

Ventura County Water and Sanitation Department (VCWSD). 2015. Arroyo Las Posas and Arroyo Simi Arundo Removal Feasibility and Water Savings Study. Prepared by Wildscape Restoration. January 2015.

Ventura County Waterworks District No. 1 (VCWWD-1). 2020. Draft Technical Memorandum: MWRF Stormwater Diversion and Groundwater Recharge Feasibility Study. Prepared by Resource Consultants, Inc.

Ulrich, C., S. Uhlemann, M. Newcomer, and P. Fish. Not Dated. Arroyo Las Posas Stormwater Diversion Feasibility Study and Diversion Test. Prepared for Ventura County Waterworks District No. 1.

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Appendix A

Project Evaluation Checklist and Project Ranking Sheet

LAS POSAS VALLEY WATERMASTER

c/o Fox Canyon Groundwater Management Agency
800 S. Victoria Avenue | Ventura, CA 93009-1610 | Tel: (805) 654-2010 | LPV.Watermaster@ventura.org

Project Evaluation Checklist

BACKGROUND INFORMATION	
Project Name:	(Please fill in)
Purpose of Project:	(Please select one)
Project Type:	(Please select one)
Sponsoring Agency:	(Please fill in)
Management Area:	(Please select one)
Location:	(Please fill in)
Project Description:	(Please fill in)
Implementation Trigger (if applicable):	(Please fill in)

Evaluation Criteria	Response (Applicant to Complete)
Water Supply	
Annual increase in Sustainable Yield (AFY):	(Please fill in)
Annual increase in supplemental water in lieu of pumping (AFY):	(Please fill in)
Groundwater demand reduction (AFY):	(Please fill in)
List all sustainability indicators addressed by the project:	(Please fill in)
Project documentation included?	(Please select one)
Timing/Feasibility	
Project Implementation Timeframe	
Current Project status:	(Please select one)
Estimated time to Project completion (years):	(Please fill in)
Timeline / feasibility documentation included?	(Please select one)
Environmental	
CEQA/NEPA type:	(Please select one)
Status of CEQA/NEPA review and permitting:	(Please select one)
Will the Project likely be permitted?	(Please select one)
Sensitivity of location:	(Please fill in)
Permitting	
Permits required:	(Please fill in)
Status / time required:	(Please fill in)
Likelihood of Project being permitted:	(Please select one)

Project Evaluation Checklist

Project Complexity	
Does the Project use new technology:	(Please select one)
Does the Project require land acquisition:	(Please select one)
Status of the land acquisition process:	(Please select one)
Is the Project dependent on other unbuilt or unfunded projects:	(Please select one)
Is the Project dependent on funded projects currently under construction:	(Please select one)
Description of Operation and Maintenance (if applicable):	(Please fill in)
Project Lifespan	
What is the projected lifespan of the Project:	(Please fill in)
Project Phasing	
Please provide documentation of anticipated project phasing, including schedules and costs (capital and O&M) for each phase, as an attachment to this form.	
Does Project require multiple phases of construction?	(Please select one)
No. of anticipated construction phases:	(Please fill in)
Description of phases:	(Please fill in)
Phasing timeline:	(Please fill in)
Total cost per phase:	(Please fill in)
Project phasing documentation attached?	(Please select one)
Cost and Funding	
Total capital cost:	(Please fill in)
Total annual Operations & Maintenance (O&M) Cost:	(Please fill in)
Is the project Proponent providing a funding match to construct the project?	(Please fill in)
Is there a funding source other than FCGMA for ongoing operation and maintenance costs?	(Please fill in)
Additional Project Considerations	
Is it necessary to collaborate and/or coordinate with FCGMA, Calleguas, WWDs, United Water Conservation District, or the Water Rights Holders for project implementation?	(Please select one)
If yes, please describe the anticipated collaboration/coordination.	(Please fill in)
Describe any material and unreasonable impacts that cannot be mitigated and/or any negative impacts to sustainability indicators caused by the project.	(Please fill in)
Project Proponent Contact Information	**Response (Applicant to Complete)**
Name:	(Please fill in)

LAS POSAS VALLEY WATERMASTER

c/o Fox Canyon Groundwater Management Agency

800 S. Victoria Avenue | Ventura, CA 93009-1610 | Tel: (805) 654-2010 | LPV.Watermaster@ventura.org

Project Evaluation Checklist

Title:	(Please fill in)
Organization:	(Please fill in)
Email:	(Please fill in)
Phone:	(Please fill in)
Date:	(Please fill in)

Project Ranking Sheet

Project Name_____ **Project Type**_____

Sponsoring Agency_____ **Mgmt. Area**_____

WATER SUPPLY

1. Total Sustainable Yield / Supplemental Water / Reduced Demand

Total additional water supplied by the project for the benefit of the basin through increase to sustainable yield, supplemental water to be delivered in lieu of pumping, or reduction in groundwater demand.

_____AFY increased sustainable yield

_____AFY supplemental water in lieu of pumping

_____AFY groundwater demand reduction

Points Awarded

5	10	15	20	25
<500 AFY	≤500 AFY <2,500 AFY	≤2,500 to AFY <5,000 AFY	≤5,000 AFY <7,500 AFY	≥7,500 AFY

2. Sustainable Yield / Supplemental Water / Reduced Demand Documentation

Project documentation includes verifiable quantified estimate of increased sustainable yield, supplemental water, and/or reduced groundwater demand.

Points Awarded

5	10	15	20	25
Conceptual estimate - no supporting documentation	Conceptual estimate - limited supporting documentation	Initial feasibly study supporting estimate	Preliminary design and/or modeling supporting estimate	Detailed design and/or modeling supporting estimate

TIMING / FEASIBILITY

3. Project Implementation Timeframe

What is the project implementation timeframe?

Points Awarded

1	5	10	15	20
Cannot be implemented prior to 2040	May be operational by 2040, but uncertain	Can be operational by 2040	Can be operational in 10 years or less	Can be operational in 5 years or less

4. Development Phase

How far along is the definition, feasibility, design, and development of the project?

Points Awarded

1	2	3	4	5
Conceptual – no feasibility or design, project not well defined	Feasibility study in progress, project well defined	Initial feasibly study completed	30% engineering design	60% or greater engineering design

5. Status of Approvals, Permits, and Environmental Review

What is the status of NEPA/CEQA review and permitting?

Points Awarded

1	2	3	4	5
Permit requirements not identified or unknown	Expected to take >5 years	Underway and approvals expected <3 years	Underway and approvals expected ≤1 year	Permitting and CEQA / environmental review complete

6. Project Complexity

How complex is the project? For example, does it require multiple phases of construction; does it use proven technology; does it require land acquisition; is dependent upon other projects; and/or does it require complex permitting?

Points Awarded

1		3		5
Very complex, relies on unproven technology		Moderately complex		Low complexity, uses readily available proven technology

7. Land Acquisition

Does the project require land acquisition or easements, and if so, what is the status?

Points Awarded

1	2	3	4	5
Required, not started and/or potential eminent domain	Process started, but less than 25% complete	>25% but <50% complete	More than 50% complete	Not required or all acquisitions and/or easements complete

8. Dependency on Other Projects

Is the project dependent upon other projects?

Points Awarded

1		3		5
Project is dependent on other unbuilt and unfunded projects		Project is dependent on funded projects under construction		Not dependent on other unbuilt projects

9. Project Lifespan

What is the projected lifespan of the project?

Points Awarded

1	2	3	4	5
≤5 years		10 years		≥20 years

COST & FUNDING

10. Water Cost

Projected total cost of water produced, saved, or increase in sustainable yield.

$_____ Total capital cost

$_____ Total annual O&M cost

$_____ Annual O&M cost per AF

$_____ Annual cost (all costs including capital and O&M) per AF

Points Awarded

1	5	10	15	20
≥$3,000 / AF	≤$2,000 / AF <$3,000 / AF	≤$1,000 / AF <$2,000 / AF	>$500 / AF <$1,000 / AF	≤$500 / AF

11. Funding Match for Construction

Is the project proponent providing a funding match to construct the project?

Points Awarded

1	4	8	12	15
No match	<10% match	10 to 25% match	25 to 50% match	>50% match

12. O&M Funding

Is there a funding source other than FCGMA for ongoing operation & maintenance costs?

Points Awarded

1	4	8	12	15
No funding identified	25%	50% of funding committed	75%	100% of funding committed

ADDITIONAL PROJECT CONSIDERATIONS

13. Collaboration/Cooperation/Participation

Is it necessary or desirable to collaborate and/or coordinate with FCGMA, Calleguas, WWDs, United Water Conservation District, or the Water Right Holders for project implementation?

Points Awarded

N/A
Coordination requirements will not impact final project scoring.

14. Impact on Sustainability Indicators

What impact will the project have on sustainability indicators applicable to the LPVB (i.e., chronic lowering of groundwater levels, reduction of groundwater in storage, degraded groundwater quality, land subsidence, depletions of interconnected surface water)?

Points Awarded

1	5	10	15	20
May have negative impact on sustainability indicator.	Does not address sustainability indicators.	May help mitigate one sustainability indicator.	May help mitigate two sustainability indicators.	May help mitigate three or more sustainability indicators.

Ranked by_____ **Date**_____

Appendix B

Project Ranking Sheets

Appendix B
Project Scoring Matrix

Project 1: Arroyo Simi Las Posas Arundo Removal

		Criteria		Notes
FCGMA Evaluation Criteria Scores	Water Supply	Total Sustainable Yield/ Supplemental Water/ Reduced Demand	<500 AFY	To support development of the GSP, the Nature Conservancy estimated that Arundo Donax removal from approximately 324 acres of land within the Arroyo Simi-Las Posas corridor could result in an increase in up to an additional 2,680 AFY of recharge to the ELPMA. However, modeling for the Periodic Evaluation found no increase in sustainable yield unless groundwater storage in the southern ELPMA was increased through a project such as the Moorpark Desalter.
		Points	5	
		Sustainable Yield/ Supplemental Water/ Reduced Demand Documentation	Conceptual estimate - no supporting documentation	In 2015, VCWSD conducted a study to characterize water savings associated with removing Arundo Donax from the Arroyo Simi-Las Posas corridor. The study demonstrates that the net water savings associated with Arundo Removal is 2,680 AFY. However, the volume of this water savings that ultimately recharges the ELPMA is not characterized. Additional modeling is required.
		Points	5	
	Timing / Feasibility	Project Implementation Timeframe	Can be operational in 5 years or less	The project will be implemented in two phases: Phase (1) - development of an Arundo work plan (2 years) Phase (2) - Arundo Removal (1 to 2 years)
		Points	20	
		Development Phase	Conceptual - no feasibility or design, project not well defined	The work plan for this project has not been developed. Because of this, the scope / scale of this project is considered preliminary.
		Points	1	
		Status of Approvals, Permits, and Environmental Review	Permit requirements not identified or unknown	Specific permitting and CEQA requirements will be identified as part of the work plan development.
		Points	1	
		Project Complexity	Low complexity, uses readily available proven technology	Similar projects have been implemented within the Ventura Watershed and the project does not rely on new technology.
		Points	5	
		Land Acquisition	Required, not started and/or potential eminent domain	Access to perform field assessment tasks is required. Easements or access agreements need to be secured with property owners.
		Points	1	
		Dependency on Other Projects	Project is dependent on other unbuilt and unfunded projects	Modeling for the GSP Periodic Evaluation found that the Arundo Removal Project would provide little benefit to the ELPMA unless new project(s) are implemented to increase the available storage in the southern ELPMA such as the Moorpark Desalter.
		Points	1	
		Project Lifespan	>20 years	Project lifespan is indefinite, with annual O&M costs to ensure long-term removal.
		Points	5	
	Cost & Funding	Water Cost	≥$3,000 / AF	$400,000 Work Plan $9,100,000 Total capital cost ($7.4 M from GSP with CPI adj.) $380,000 Annual cost assuming 25 yr life (no interest or future CPI adj) $142 Annual capital costs per AF (@2,680 AFY) $250 Annual O&M cost (@2,680 AFY; $200 per AF from GSP with CPI adj.) $392 Total annual cost per AF of additional recharge However, as stand-alone project may be over $3,000 per AF annual cost.
		Points	1	
		Funding Match for Construction	No Match	This project would be funded through the Basin assessment. FCGMA anticipates pursuing grant funding for this, as it becomes available.
		Points	1	
		O&M Funding	No funding identified	O&M would be funded through the Basin assessment.
		Points	1	
	Additional Benefits	Collaboration / Participation Required	Yes	Collaboration with water right holders may be required to develop access agreements for initial Arundo removal and O&M.
		Points	N/A	
		Impacts on Sustainability Indicators	Does not address sustainability indicators.	If implemented with a project to increase storage in the ELPMA, the project is expected to support groundwater quality, level, and storage management within the ELPMA. However, as a stand-alone project, the Arundo Removal Project would not address sustainability indicators.
		Points	5	
		Total Points:	**52**	

Appendix B
Project Scoring Matrix

Project 2: Purchase of Imported Water from CWMD for Basin Replenishment

		Criteria		Notes
FCGMA Evaluation Criteria Scores	Water Supply	Total Sustainable Yield/ Supplemental Water/ Reduced Demand	≤2,500 to <5,000 AFY	For the GSP, it was assumed that 1,760 AFY of CMWD water would be purchased and delivered in the WLPMA to ZMWC and VCWWD-19, and 1,380 AFY to VCWWD-1 in ELPMA. FCGMA assumes that this same volume would be available for this Project.
		Points	15	
		Sustainable Yield/ Supplemental Water/ Reduced Demand Documentation	Initial feasibility study supporting estimate	Although an initial feasibility study has not been conducted, empirical monitoring data from a similar program conducted between 1995 and 2008 demonstrated the feasibility of the project.
		Points	15	
	Timing / Feasibility	Project Implementation Timeframe	Can be operational in 5 years or less	Project would use existing delivery infrastructure. ZMWC pipeline improvements, which are underway, are required to fully utilize the water provided through this project. Implementation timeline is ultimately contingent on funding availability and negotiations between FCGMA, ZMWC, and VCWWD-19.
		Points	20	
		Development Phase	60% or greater engineering design	This project would establish a program similar to one that operated within the LPV between 1998 and 2005.
		Points	5	
		Status of Approvals, Permits, and Environmental Review	Permitting and CEQA/ environmental review complete	Permitting and CEQA is not required to implement this project.
		Points	5	
		Project Complexity	Low complexity, uses readily available proven technology	Project uses existing infrastructure and was successfully implemented between 1995 and 2008.
		Points	5	
		Land Acquisition	Not required or all acquisitions an/or easements complete	Project uses existing infrastructure. No additional land acquisition or easements are required.
		Points	5	
		Dependency on Other Projects	Not dependent on other unbuilt projects	Project is not dependent on other unbuilt projects. CMWD has indicated that there is sufficient water supplies to implement this project at a variety of scales in most years.
		Points	5	
		Project Lifespan	>20 years	CMWD indicates that this Project lifespan would exceed 50 years.
		Points	5	
	Cost & Funding	Water Cost	$1000 to $2000 /AF	Project proposes incentive for difference between pumping cost and cost of CMWD imported water. CMWD 2025 Tier 1 rate is $1,895/AF; water rates are anticipated to increase in the future. Pumping costs are not presently identified.
		Points	10	
		Funding Match for Construction	No Match	No additional funding sources have been identified.
		Points	1	
		O&M Funding	100% of funding committed	No additional O&M costs are expected beyond annual water costs.
		Points	15	
	Additional Benefits	Collaboration / Participation Required	Yes	Coordination is required between FCGMA, CMWD, and participating water purveyors.
		Points	N/A	
		Impacts on Sustainability Indicators	May help mitigate two sustainability indicators	Supports groundwater elevation and storage management within the WLPMA.
		Points	15	
		Total Points:	**121**	

Appendix B
Project Scoring Matrix

Project 3: Arroyo Las Posas Storm Water Capture and Recharge

		Criteria		Notes
FCGMA Evaluation Criteria Scores	Timing / Feasibility	Total Sustainable Yield/ Supplemental Water/ Reduced Demand	< 500 AFY	VCWWD-1 estimates that this project will provide an additional 2,000 AFY of recharge to the ELPMA. However, similar to Project 1, this project would not be expected to recharge the underlying Shallow Alluvial Aquifer without a companion project such as the Moorpark Desalter to increase available groundwater storage. As a stand-alone project, this project would not be expected to provide significant benefit to the Basin.
		Points	5	
		Sustainable Yield/ Supplemental Water/ Reduced Demand Documentation	Conceptual estimate - no supporting documentation	VCWWD-1 has undertaken significant efforts to advance this project, including conducting geophysical surveys/investigations to help design their recharge basins and performing hydrologic modeling to estimate the volume of storm flows that would be available for diversion. However, no groundwater modeling has been conducted to characterize the storage capacity of the ELPMA and volume of recharged water that remains in the ELPMA
		Points	5	
		Project Implementation Timeframe	Can be operational by 2040	VCWWD-1 anticipates that this project could be constructed by the end of 2027. Documentation provided by VCWWD indicates that the feasibility study will not be completed until March 30, 2025. No construction timeline was provided.
		Points	10	
		Development Phase	FS in progress, project well defined	VCWWD-1 anticipates completing the Feasibility Study by March 30, 2025.
		Points	2	
		Status of Approvals, Permits, and Environmental Review	Underway and approvals expected < 3 years	VCWWD-1 has not started the permitting process, but understands that coordination with CDFW, RWQCB, ACOE, and VCWPD will be required. VCWWD anticipates that permitting will take 1 year.
		Points	3	
		Project Complexity	Moderately Complex	The project does not employ new or novel technologies, but construction of the project is moderately complex, and includes construction of diversion and percolation facilities (pipelines, pumping stations, and a fish ladder).
		Points	3	
		Land Acquisition	Not required or all acquisitions an/or easements complete	VCWWD-1 indicates that no land acquisitions or easements are required.
		Points	5	
		Dependency on Other Projects	Project is dependent on other unbuilt projects	Project requires a companion project such as the Moorpark Desalter to increase available groundwater storage in the southern portion of the ELPMA to provide significant benefit to the Basin.
		Points	1	
		Project Lifespan	>20 years	VCWWD-1 anticipates a 25 year project lifespan.
		Points	5	
	Cost & Funding	Water Cost	>$3000 / AF	VCWWD-1 anticipates that capital costs to construct this project will be $4M but has not provided estimates of O&M costs. Because of this, total water costs associated with the Project cannot be calculated and, therefore, have been assigned a value of ">$3,000/AF" to reflect uncertainty in overall Project costs.
		Points	1	
		Funding Match for Construction	No Match	No additional funding sources have been identified.
		Points	1	
		O&M Funding	No funding identified	No funding match for O&M has been identified.
		Points	1	
	Additional Benefits	Collaboration / Participation Required	Yes	Collaboration between VCWWD-1, VCWPD, and FCGMA will be required.
		Points	N/A	
		Impacts on Sustainability Indicators	Does not address sustainability indicators.	If implemented with a project to increase storage in the ELPMA, the project is expected to support groundwater elevation and storage management within the ELPMA. However, as a stand-alone project, the Arroyo Las Posas Storm Water Capture and Recharge Project would not address sustainability indicators.
		Points	5	
		Total Points:	**47**	

Project 4: Moorpark Desalter

		Criteria		Notes
FCGMA Evaluation Criteria Scores	Water Supply	Total Sustainable Yield/ Supplemental Water/ Reduced Demand	<500 AFY	VCWWD-1 estimates that this project will extract up to 7,600 AFY of groundwater from the ELPMA with a likely request for an additional 5,000 AFY of extraction allocation. VCWWD-1 intends to use produced water in lieu of purchasing imported water from CMWD. Modeling conducted in 2016 indicates that operation of the desalter wells at 6,270 AFY would induce an additional 2,200 AFY of recharge to the ELPMA. Net water-supply impact would be -2,800 AFY.
		Points	5	
		Sustainable Yield/ Supplemental Water/ Reduced Demand Documentation	Initial feasibility study supporting estimate	VCWWD-1 conducted preliminary numerical groundwater flow modeling in 2016 to support an initial assessment of the proposed desalter. Additional modeling would be required to evaluate the effects of the desalter under different management scenarios to characterize project benefits and impact on sustainable yield.
		Points	15	
	Timing / Feasibility	Project Implementation Timeframe	May be operational by 2040, but uncertain	No feasibility study or design has been completed for this project.
		Points	5	
		Development Phase	Conceptual - no feasibility or design, project not well defined	No feasibility study or design has been completed for this project.
		Points	1	
		Status of Approvals, Permits, and Environmental Review	Permit requirements not identified or unknown	VCWWD-1 anticipates that CEQA and NEPA will be required, but the specific permits and regulatory requirements have not been identified.
		Points	1	
		Project Complexity	Moderately Complex	The project does not employ new technology. However, the project would require construction of a desalter well field, treatment system, and conveyance infrastructure.
		Points	3	
		Land Acquisition	Required, not started and/or potential eminent domain	Land acquisition / easements will be identified through an initial feasibility study.
		Points	1	
		Dependency on Other Projects	Project is dependent on other unbuilt projects and unfunded projects	Construction of additional pipeline would be required to connect to the CMWD Salinity Management Pipeline.
		Points	1	
		Project Lifespan	>20 years	VCWWD-1 anticipates a 25 year project lifespan.
		Points	5	
	Cost & Funding	Water Cost	>$3000 / AF	VCWWD-1 anticipates that capital costs to construct this project will be $40M but has not provided estimates of O&M costs. Because of this, total water costs associated with the Project cannot be calculated and, therefore, have been assigned a value of ">$3,000/AF" to reflect uncertainty in overall Project costs.
		Points	1	
		Funding Match for Construction	No Match	No funding sources have been identified other than other than potential federal or state grants or loans.
		Points	1	
		O&M Funding	No funding identified	No funding match for O&M has been identified.
		Points	1	
	Additional Benefits	Collaboration / Participation Required	Yes	Collaboration between VCWWD-1 and FCGMA will be required. Additionally, it is anticipated that VCWWD-1 will need to coordinate with CMWD to dispose of desalter brine through CMWD's existing disposal infrastructure.
		Points	N/A	
		Impacts on Sustainability Indicators	May have negative impact on sustainability indicator	Project could result in a 2,800 AFY reduction in water supplies to the ELPMA if the produced water is used in lieu of purchase of CMWD imported water, as described in VCWWD-1's project description.
		Points	1	
		Total Points:	**41**	

Appendix B
Project Scoring Matrix

Project 5: Arroyo Simi-Las Posas Water Acquisition

		Criteria		Notes
FCGMA Evaluation Criteria Scores	Water Supply	Total Sustainable Yield/ Supplemental Water/ Reduced Demand	≤500 to <2,500 AFY	Failure to maintain discharges to Arroyo Simi-Las Posas could reduce the sustainable yield by 1,200 AFY, depending on the volume of SVWQCP discharges maintained in Arroyo Simi-Las Posas.
		Points	10	
		Sustainable Yield/ Supplemental Water/ Reduced Demand Documentation	Preliminary Design and / or modeling supporting estimate	Modeling conducted for the periodic GSP evaluations indicate that maintaining SVWQCP discharges may provide between 2,400 and 3,600 AFY of additional recharge to the ELPMA, compared to what was projected in FCGMA (2019). Additional modeling will need to be conducted when a final volume of discharges is agreed upon by both FCGMA, Water Rights Holders, and the City of Simi Valley.
		Points	20	
	Timing / Feasibility	Project Implementation Timeframe	May be operational by 2040, but uncertain	The project does not require new infrastructure, but will require negotiation of real property (i.e. recycled water) pricing and availability. Final agreed upon terms are presently not known.
		Points	5	
		Development Phase	Conceptual - no feasibility or design, project not well defined	Modeling for the GSP found that loss of this water would result in a reduction of 1,200 AFY of sustainable yield. Modeling conducted for the periodic GSP evaluations indicate that maintaining SVWQCP discharges may provide between 2,400 and 3,600 AFY of additional recharge to the ELPMA. Additional groundwater modeling under different project scenarios would be needed to evaluate the full impacts of loss of these flows.
		Points	1	
		Status of Approvals, Permits, and Environmental Review	Permit requirements not identified or unknown	Discharges will need to comply with the City's NPDES permit and TMDL limits. Additional permitting is not anticipated for this project.
		Points	1	
		Project Complexity	Low complexity, uses readily available proven technology	Project does not involve new technology or infrastructure. Project is readily implementable once agreement is developed and finalized with the City of Simi Valley.
		Points	5	
		Land Acquisition	Not required or all acquisitions an/or easements complete	No additional land acquisition or easements are required.
		Points	5	
		Dependency on Other Projects	Not dependent on other unbuilt projects	This project and Project 6 Recycled Water Pipeline would utilize the same source of water and benefits are mutually exclusive. There may be additional benefits if the Arundo Removal project and a Desalter are implemented.
		Points	5	
		Project Lifespan	>20 years	Project lifespan will depend upon final negotiations.
		Points	5	
	Cost & Funding	Water Cost	<$500 / AF	This is an assumed cost. The actual cost is subject to the final agreement with the City of Simi Valley.
		Points	20	
		Funding Match for Construction	No Match	No construction is required.
		Points	1	
		O&M Funding	No funding identified	SVWQCP O&M will be managed by the City of Simi Valley. Purchase of water subject to an agreement with the City would be funded through Basin Assessment.
		Points	1	
	Additional Benefits	Collaboration / Participation Required	Yes	Coordination and collaboration required with FCGMA and the City of Simi Valley.
		Points	N/A	
		Impacts on Sustainability Indicators	May help mitigate two sustainability indicators	Supports groundwater level and storage management in the ELPMA.
		Points	15	
		Total Points:	**94**	

Appendix B
Project Scoring Matrix

Project 6: Delivery of Recycled Water to Las Posas Users via Pipeline

		Criteria		Notes
FCGMA Evaluation Criteria Scores	Water Supply	Total Sustainable Yield/ Supplemental Water/ Reduced Demand	500 to <2500	Project would deliver 3,000 AFY of recycled water to Berylwood Heights MWC and potentially Zone MWC via pipeline rather than continuing to discharge to the Arroyo Simi-Las Posas for recharge in the ELPMA. Project water supply based on estimated avoidance of 640 to 1,600 AFY of ET losses.
		Points	10	
		Sustainable Yield/ Supplemental Water/ Reduced Demand Documentation	Conceptual estimate - no supporting documentation	The volume of RW available for delivery and use in lieu of groundwater is uncertain and will depend upon multiple factors, including: (i) the willingness of Berylwood Heights MWC and potentially Zone MWC to use RW water with relatively high salinity, (ii) the volume of water acquired by FCGMA for discharge to Arroyo Simi Las Posas.
		Points	5	
	Timing / Feasibility	Project Implementation Timeframe	May be operational by 2040, but uncertain	The project requires significant new infrastructure, negotiation of easements along new pipeline right-of-way, and the negotiation of real property (i.e., recycled water) pricing and availability. Final agreed upon terms and infrastructure requirements are uncertain.
		Points	5	
		Development Phase	Conceptual - no feasibility or design, project not well defined	No feasibility has been conducted to evaluate infrastructure needs, current RW demands, and current RW availability.
		Points	1	
		Status of Approvals, Permits, and Environmental Review	Permit requirements not identified or unknown	This project would require construction of new pump station and 8.6 miles of conveyance infrastructure. Permitting requirements to construct these facilities would be identified through an initial feasibility study.
		Points	1	
		Project Complexity	Moderately Complex	This project does not rely on new technology, but is technically complex because it will likely require multiple construction phases and depend on is contingent on negotiating RW availability and long-term demands
		Points	3	
		Land Acquisition	Required, not started and/or potential eminent domain	land acquisition and easement requirements will be identified through an initial feasibility study.
		Points	1	
		Dependency on Other Projects	Project is dependent on other unbuilt and unfunded projects	Delivery of RW via pipeline will decrease the volume of water discharged to the Arroyo Simi-Las Posas by an equal amount.
		Points	1	
		Project Lifespan	>20 years	Not well defined.
		Points	5	
	Cost & Funding	Water Cost	$1000 to $2000 /AF	Infrastructure costs are based on estimates developed by Kennedy Jenks (CMWD 2017). However, this cost omits the cost of purchase or lease of the water from the City of Simi Valley, loss of recharge to the Arroyo Simi-Las Posas, and desalter(s) that may be required to treat the water, and should be fully evaluated in a feasibility study.
		Points	10	
		Funding Match for Construction	No Match	None identified. Project is conceptual, but cost would likely need to be funded through Basin Assessment.
		Points	1	
		O&M Funding	No funding identified	None identified. Project is conceptual, but cost would likely need to be funded through Basin Assessment.
		Points	1	
	Additional Benefits	Collaboration / Participation Required	Yes	Coordination is required between FCGMA, MWCs, and City of Simi Valley
		Points	N/A	
		Impacts on Sustainability Indicators	May help mitigate one sustainability indicator	While the increase in water supply supports groundwater level and storage management in the ELPMA, the project may have water quality impacts if the RW is not desalted.
		Points	10	
		Total Points:	**54**	

Appendix B
Project Scoring Matrix

Project 7: In Lieu Deliveries to Northern ELPMA Feasibility Study

		Criteria		Notes
FCGMA Evaluation Criteria Scores	Water Supply	Total Sustainable Yield/ Supplemental Water/ Reduced Demand	≤500 AFY to <2,500 AFY	The volume of in lieu water needed to address the long-term groundwater declines in the northern ELPMA is not presently known, but will be identified in the feasibility study. Initial assumptions are it will be in the ≤500 AFY to <2,500 AFY range.
		Points	10	
		Sustainable Yield/ Supplemental Water/ Reduced Demand Documentation	Conceptual Estimate - limited documentation	Preliminary modeling conducted and presented to the FCGMA Board.
		Points	10	
	Timing / Feasibility	Project Implementation Timeframe	Can be operational by 2040	Depending on new infrastructure that may be required identified in the feasibility study, it is anticipated that the project can be operational by 2040.
		Points	10	
		Development Phase	Conceptual - no feasibility or design, project not well defined	Project is conceptual. Current project proposal is for a feasibility study.
		Points	1	
		Status of Approvals, Permits, and Environmental Review	Permit requirements not identified or unknown	Permits required to implement this project will be identified through the FS.
		Points	1	
		Project Complexity	Moderately complex	Depending on new infrastructure that may be required identified in the feasibility study, the project may be moderately complex.
		Points	3	
		Land Acquisition	Required, not started and/or potential eminent domain	Depending on new infrastructure that may be required identified in the feasibility study, easements may be required.
		Points	1	
		Dependency on Other Projects	Not dependent on other unbuilt projects	Project is not anticipated to be dependent on other unbuilt projects.
		Points	5	
		Project Lifespan	≥20 years	Project would be expected to have a lifespan greater than 20 years.
		Points	5	
	Cost & Funding	Water Cost	>$3000 / AF	Feasibility Study will identify potential new sources of water supply to the northern ELPMA. A cost of "$3,000/AF" was included here to reflect uncertainty in the final project pricing.
		Points	1	
		Funding Match for Construction	No Match	No funding match has been identified.
		Points	1	
		O&M Funding	No funding identified	No O&M funding identified other than Basin Assessment.
		Points	1	
	Additional Benefits	Collaboration / Participation Required	Yes.	Collaboration with other entities is anticipated depending on the new water source(s) identified in the Feasibility Study.
		Points	N/A	
		Impacts on Sustainability Indicators	May help mitigate two sustainability indicators	Providing a new source of water in lieu of pumping in the northern ELPMA would help address the chronic decline in water levels and decrease of groundwater in storage.
		Points	15	
		Total Points:	**64**	

Project 8: Allocation Buyback and Reduction Program

		Criteria		Notes
FCGMA Evaluation Criteria Scores	Water Supply	Total Sustainable Yield/ Supplemental Water/ Reduced Demand	≤500 AFY to <2,500 AFY	Reduced demand may vary on an annual basis. The current project is to develop the policies, cost basis and mechanism for least cost, and prioritization of purchases. The program is scalable and limited by allocated funding and willing sellers. Initial projection is the program may acquire between ≤500 AFY to <2,500 AFY.
		Points	10	
		Sustainable Yield/ Supplemental Water/ Reduced Demand Documentation	Conceptual estimate - no supporting documentation	Study has not been initiated.
		Points	5	
	Timing / Feasibility	Project Implementation Timeframe	Can be operational in 5 years or less	Project does not require any new infrastructure and Watermaster has authority under the Judgment to levy fees that could be used to purchase allocation.
		Points	20	
		Development Phase	Conceptual - no feasibility or design, project not well defined	Project is conceptual and will be further defined through this study.
		Points	1	
		Status of Approvals, Permits, and Environmental Review	Underway and approvals expected in ≤ 1 year	Permits not required. Environmental review anticipated on a program level in less than a year.
		Points	4	
		Project Complexity	Low complexity, uses readily available proven technology	
		Points	5	
		Land Acquisition	Not required or all acquisitions an/or easements complete	
		Points	5	
		Dependency on Other Projects	Not dependent on other unbuilt projects	
		Points	5	
		Project Lifespan	≥20 years	Depending on policies enacted by the Watermaster Board, the project could have an indefinite lifespan.
		Points	5	
	Cost & Funding	Water Cost	>$500 / AF to <$1,000 / AF	The cost of acquiring allocation is not known and will depend upon the policies and mechanisms enacted to provide least-cost acquisition. For purposes of scoring the project, acquisition of Annual Allocation and/or Carryover is assumed to be in the >$500 / AF to <$1,000 / AF range. Purchase of Allocation Basis is expected to be more.
		Points	15	
		Funding Match for Construction	No Match	This program does not require construction. Development of the program is estimated at $100,000 which would be funded through Basin Assessment.
		Points	1	
		O&M Funding	No funding identified	Funding is anticipated through Basin Assessment.
		Points	1	
	Additional Benefits	Collaboration / Participation Required	Yes.	Implementation of this project will require coordination between FCGMA and stakeholders.
		Points	N/A	
		Impacts on Sustainability Indicators	May help mitigate two sustainability indicators	Implementation of the program would help to address potential undesirable results due to chronic lowering of groundwater levels and decreases in groundwater storage.
		Points	15	
		Total Points:	**92**	

Project 9: Regional Desalter Feasibility Study

		Criteria		Notes
FCGMA Evaluation Criteria Scores	Water Supply	Total Sustainable Yield/ Supplemental Water/ Reduced Demand	≤2,500 AFY to <5,000 AFY	Initial estimate of potential benefit of a regional desalter, to be evaluated in the feasibility study.
		Points	15	
		Sustainable Yield/ Supplemental Water/ Reduced Demand Documentation	Conceptual estimate - no supporting documentation	
		Points	5	
	Timing / Feasibility	Project Implementation Timeframe	May be operational by 2040, but uncertain	While the feasibility study is estimated to require 18 months to complete, design, permitting, and construction of a regional desalter would be expected to require at least 10 years.
		Points	5	
		Development Phase	Conceptual - no feasibility or design, project not well defined	
		Points	1	
		Status of Approvals, Permits, and Environmental Review	Permit requirements not identified or unknown	Permits and environmental review will be determined by the feasibility study.
		Points	1	
		Project Complexity	Moderately complex	While the project does not rely on new technology, the regional desalter project will require significant construction, fairly complex environmental compliance and permitting, and land acquisition and easements.
		Points	3	
		Land Acquisition	Required, not started and/or potential eminent domain	
		Points	1	
		Dependency on Other Projects	Project is dependent on other unbuilt and unfunded projects	Project dependency will be evaluated in the feasibility study, but the project will likely be dependent on other pipeline projects.
		Points	1	
		Project Lifespan	>20 years	
		Points	5	
	Cost & Funding	Water Cost	>$3000 / AF	Total water cost including capital and O&M costs is not known, but could be >$3,000 per AF.
		Points	1	
		Funding Match for Construction	No Match	No funding matches have been identified at this time. The feasibility study will identify potential funding and financing opportunities. Some or all of the funding likely will need to come from Basin Assessment.
		Points	1	
		O&M Funding	No funding identified	O&M costs will likely need to come from Basin Assessment.
		Points	1	
	Additional Benefits	Collaboration / Participation Required	Yes.	Preparation of the Regional Desalter Feasibility Study will require coordination with FCGMA, CMWD, VCWWD 1, mutual water companies, stakeholders, and others who may be identified.
		Points	N/A	
		Impacts on Sustainability Indicators	May help mitigate two sustainability indicators	A regional desalter would support groundwater level and storage management in the ELPMA.
		Points	15	
		Total Points:	**55**	

Appendix C

Individual Basin Optimization Project Schedules

Project 2: Purchase of Imported Water from CMWD for Basin Replenishment

FY 2025-26 (7/1/2025 – 9/30/2025)

Q2 (10/1/2025 – 12/31/2025)

- Begin development of program policy
- Work with VCWWD-1, VCWWD-19, and Zone MWC to determine pumping costs to inform amount of incentive needed and projected annual volume of in-lieu deliveries
- Meet with CMWD to confirm availability and cost of imported water for program

Q3 (1/1/2026 – 3/31/2026)

- Initial analysis of Watermaster Budget and Basin Assessment needed to fund program
- PAC/TAC consultation on draft policy and incentive

Q4 (4/1/2026 – 6/30/2026)

- Develop incentive agreements including reporting requirements
- Watermaster Budget and Basin Assessment review by Fiscal Committee, Committee Consultation
- Finalize program policy and incentive amount; adoption by Watermaster Board

FY 2026-27 (7/1/2026 – 6/30/2027)

- Program implementation

FY 2027-28 (7/1/2027 – 6/30/2028)

- First-year program review report to Watermaster Board
- Ongoing program implementation

FY 2028-29 (7/1/2028 – 6/30/2029)

- Ongoing program implementation

FY 2029-30 (7/1/2029 – 6/30/2030)

- Ongoing program implementation

Project 5: Arroyo Simi-Las Posas Water Acquisition

FY 2025-26 (7/1/2025 – 9/30/2025)

Q2 (10/1/2025 – 12/31/2025)

- Initiate discussions/negotiations for purchase or lease agreement with City of Simi Valley (real-property, Board closed session)

Q3 (1/1/2026 – 3/31/2026)

- Continued negotiations for purchase or lease agreement with City of Simi Valley (real-property, Board closed session)

Q4 (4/1/2026 – 6/30/2026)

- Continued negotiations for purchase or lease of agreement with City of Simi Valley (real property, Board closed session)

FY 2026-27 (7/1/2026 – 6/30/2027)

- Continued negotiations for purchase or lease of agreement with City of Simi Valley (real property, Board closed session)
- PAC/TAC consultation
- Watermaster Budget and Basin Assessment review by Fiscal Committee, Committee Consultation, and Watermaster Board adoption
- Finalize draft purchase or lease agreement with City of Simi Valley (real property, Board closed session)
- Board execution of final agreement
- Program implementation

FY 2027-28 (7/1/2027 – 6/30/2028)

- Ongoing program implementation

FY 2028-29 (7/1/2028 – 6/30/2029)

- Ongoing program implementation

FY 2029-30 (7/1/2029 – 6/30/2030)

- Ongoing program implementation

Project 8: Allocation Buyback and Reduction Program

FY 2025-26 (7/1/2025 – 9/30/2025)

Q2 (10/1/2025 – 12/31/2025)

- Begin development of program scope and policy

Q3 (1/1/2026 – 3/31/2026)

- Draft program scope and policy discussed at Executive Committee
- PAC/TAC consultation on draft scope and policy

Q4 (4/1/2026 – 6/30/2026)

- RFP and engage consultant to assist with development of process for least-cost allocation acquisition and transaction mechanics

FY 2026-27 (7/1/2026 – 6/30/2027)

- Consultant assisting with development of process for least-cost allocation acquisition and transaction mechanics
- Consultant report on proposed transaction mechanics
- Executive Committee review of draft program
- Analysis of Watermaster Budget and Basin Assessment needed to fund pilot program
- Fiscal Committee review of Watermaster Budget and Basin Assessment needed to fund pilot program
- Watermaster Board approval of draft pilot program with PAC/TAC consultation as appropriate

FY 2027-28 (7/1/2027 – 6/30/2028)

- Pilot program beginning in Water Year 2028 (10/1/2027 – 9/30/2028)

FY 2028-29 (7/1/2028 – 6/30/2029)

- Pilot program during Water Year 2028 (10/1/2027-9/30/2028)
- Review of pilot program
- Expand to full program for temporary allocation (Annual Allocation and Carryover) starting Water Year 2029 (10/1/2028 – 9/30/2029)
- PAC/TAC consultation

FY 2029-30 (7/1/2029 – 6/30/2030)

- Ongoing program implementation for Annual Allocation and Carryover
- Evaluate potential to expand program to permanent allocation (Allocation Basis)
- Potential RFP to contract consultant(s) to study economic and environmental impacts of permanent allocation purchase

Project 7: In Lieu Deliveries to Northern East Las Posas Feasibility Study

FY 2025-26 (7/1/2025 – 9/30/2025)

Q2 (10/1/2025 – 12/31/2025)

- Develop feasibility study scope of work with PAC/TAC consultation

Q3 (1/1/2026 – 3/31/2026)

- Request for Proposals (RFP) for consultant to conduct feasibility study

Q4 (4/1/2026 – 6/30/2026)

- Watermaster Board award of contract for feasibility study

FY 2026-27 (7/1/2026 – 6/30/2027)

- Feasibility study underway

FY 2027-28 (7/1/2027 – 6/30/2028)

- Draft feasibility study
- PAC/TAC consultation
- Watermaster Board review
- Final feasibility study

FY 2028-29 (7/1/2028 – 6/30/2029)

- To be determined based on results of feasibility study

FY 2029-30 (7/1/2029 – 6/30/2030)

- To be determined based on results of feasibility study

Project 9: Regional Desalter Feasibility Study

FY 2025-26 (7/1/2025 – 9/30/2025)

Q2 (10/1/2025 – 12/31/2025)

- Engage water purveyors in the ELPMA to establish interest in desalter

Q3 (1/1/2026 – 3/31/2026)

- Develop feasibility scope including modeling scenarios
- PAC/TAC consultation

Q4 (4/1/2026 – 6/30/2026)

- RFP for consultant to conduct feasibility study

FY 2026-27 (7/1/2026 – 6/30/2027)

- Watermaster Board award of contract for feasibility study
- Feasibility study underway

FY 2027-28 (7/1/2027 – 6/30/2028)

- Draft feasibility study
- PAC/TAC consultation
- Watermaster Board review
- Final feasibility study

FY 2028-29 (7/1/2028 – 6/30/2029)

- To be determined based on results of feasibility study

FY 2029-30 (7/1/2029 – 6/30/2030)

- To be determined based on results of feasibility study

Appendix D

Schedule to Implement the Basin Optimization Projects

Appendix D

Schedule to Implement the Basin Optimization Projects

Project Number	Project Name	CY 2025				CY 2026				CY 2027				CY 2028				CY 2029				CY 2030			
			WY 2026				WY 2027				WY 2028				WY 2029				WY 2030						
		FY 2025-26				FY 2026-27				FY 2027-28				FY 2028-29				FY 2029-30							
		Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
	Initial Project Implementation Planning																								
2	**Purchase of Imported Water from CMWD**																								
	Program Policy Development																								
	Water Purveyor Engagement																								
	PAC / TAC Consultation																								
	Policy & Incentive Adopted by WM Board																								
	WM Budget Review and Board Adoption																								
	Program Implementation																								
5	**Arroyo Simi-Las Posas Water Acquisition**																								
	Negotiate Agreement with City of Simi Valley																								
	PAC / TAC Consultation																								
	WM Budget Review and Board Adoption																								
	Program Implementation																								
8	**Allocation Buyback and Reduction Program**																								
	Program Development																								
	PAC / TAC Consultation																								
	Consultant Development of Transaction Mechanics																								
	WM Budget and Adoption of Pilot Program																								
	Pilot Program																								
	Program Implementation																								
7	**In Lieu Deliveries to Northern ELPMA Feasibility Study**																								
	PAC / TAC Consultation																								
	Develop SOW & RFP																								
	WM Board Award of Consultant Contract / Review of FS																								
	Feasibility Study																								
9	**Regional Desalter Feasibility Study**																								
	Initial Water Purveyor Engagement																								
	PAC / TAC Consultation																								
	Develop SOW & RFP																								
	WM Board Award of Consultant Contract / Review of FS																								
	Feasibility Study																								

Notes: **Schedule subject to WM Board approval**

CY = calendar year; WY = water year (DWR water year definition); FY = fiscal year

Agency Activities (Administration, Consultant / Contractor Procurement, Water Negotiations, Legal, Coordination)

Feasibility study

Construction or initial phase(s) of implementation

Operation and maintenance, or ongoing program implementation / evaluation

Appendix E

5-Year Basin Optimization Projects Budget

Appendix E
5-Year Basin Optimization Projects Budget

Proj. No.	Project Name	FY 2025-26 Q1	FY 2025-26 Q2	FY 2025-26 Q3	FY 2025-26 Q4	FY 2026-27 Q1	FY 2026-27 Q2	FY 2026-27 Q3	FY 2026-27 Q4	FY 2027-28 Q1	FY 2027-28 Q2	FY 2027-28 Q3	FY 2027-28 Q4	FY 2028-29 Q1	FY 2028-29 Q2	FY 2028-29 Q3	FY 2028-29 Q4	FY 2029-30 Q1	FY 2029-30 Q2	FY 2029-30 Q3	FY 2029-30 Q4	Estimated 5-Year Project Costs
	Initial Project Implementation Planning	$25,000																				$ 25,000
	Purchase of Imported Water from CMWD																					
	Program Development		$ 15,000	$ 15,000	$ 15,000																	$ 45,000
2	*Program Implementation* [a]					$ 1,095,100	$ 1,095,100	$ 1,199,200	$ 1,199,200	$ 1,199,200	$ 1,199,200	$ 1,310,600	$ 1,310,600	$ 1,310,600	$ 1,310,600	$ 1,429,800	$ 1,429,800	$ 1,429,800	$ 1,429,800	$ 1,557,400	$ 1,557,400	$ 21,063,400
	Administration [b]				$ 5,000	$ 10,000	$ 10,000	$ 10,000	$ 10,000	$ 10,000	$ 10,000	$ 10,000	$ 10,000	$ 10,000	$ 10,000	$ 10,000	$ 10,000	$ 10,000	$ 10,000	$ 10,000	$ 10,000	$ 165,000
	Estimated Annual Cost				**$ 50,000**				**$ 4,628,600**				**$ 5,059,600**				**$ 5,520,800**				**$ 6,014,400**	**$ 21,273,400**
	Arroyo Simi-Las Posas Water Acquisition																					
	Negotiate Agreement with City of Simi Valley		$ 15,000	$ 15,000	$ 15,000	$ 15,000																$ 60,000
5	*Program Implementation* [c]								$ 117,500	$ 117,500	$ 117,500	$ 117,500	$ 117,500	$ 117,500	$ 117,500	$ 117,500	$ 117,500	$ 117,500	$ 117,500	$ 117,500	$ 117,500	$ 1,527,500
	Administration [b]						$ 5,000	$ 5,000	$ 5,000	$ 5,000	$ 5,000	$ 5,000	$ 5,000	$ 5,000	$ 5,000	$ 5,000	$ 5,000	$ 5,000	$ 5,000	$ 5,000	$ 5,000	$ 75,000
	Estimated Annual Cost				**$ 45,000**				**$ 147,500**				**$ 490,000**				**$ 490,000**				**$ 490,000**	**$ 1,662,500**
	Allocation Buyback and Reduction Program [d]																					
	Program Development		$ 20,000	$ 25,000	$ 10,000	$ 10,000	$ 10,000	$ 25,000	$ 25,000	$ 10,000												$ 135,000
	Consultant Development of Transaction Mechanics				$ 40,000	$ 40,000	$ 40,000	$ 40,000	$ 40,000													$ 200,000
8	*Pilot Program*										$ 25,000	$ 25,000	$ 25,000	$ 25,000								$ 100,000
	Program Implementation														$ 250,000	$ 250,000	$ 250,000	$ 250,000	$ 250,000	$ 250,000	$ 250,000	$ 1,750,000
	Administration [b]										$ 25,000	$ 25,000	$ 25,000	$ 25,000	$ 25,000	$ 25,000	$ 25,000	$ 25,000	$ 25,000	$ 25,000	$ 25,000	$ 275,000
	Estimated Annual Cost				**$ 95,000**				**$ 230,000**				**$ 160,000**				**$ 875,000**				**$ 1,100,000**	**$ 2,460,000**
	In Lieu Deliveries to Northern ELPMA Feasibility Study																					
	Develop SOW & RFP		$ 15,000	$ 15,000	$ 5,000																	$ 35,000
7	*Feasibility Study*					$ 25,000	$ 25,000	$ 25,000	$ 25,000	$ 25,000	$ 25,000											$ 150,000
	Administration [b]					$ 1,500	$ 1,500	$ 1,500	$ 1,500	$ 5,000	$ 5,000											$ 16,000
	Estimated Annual Cost				**$ 35,000**				**$ 106,000**				**$ 60,000**				$ -				$ -	**$ 201,000**
	Regional Desalter Feasibility Study																					
	Purveyor Engagement, Development of SOW &		$ 10,000	$ 15,000	$ 15,000	$ 10,000																$ 50,000
9	*Feasibility Study*						$ 50,000	$ 50,000	$ 50,000	$ 50,000	$ 50,000	$ 50,000										$ 300,000
	Administration [b]						$ 3,000	$ 3,000	$ 3,000	$ 3,000	$ 5,000	$ 5,000										$ 22,000
	Estimated Annual Cost				**$ 40,000**				**$ 169,000**				**$ 163,000**				$ -				$ -	**$ 372,000**
	Estimated Total Quarterly Cost	**$ 25,000**	**$ 75,000**	**$ 85,000**	**$ 105,000**	**$ 1,208,495**	**$ 1,239,600**	**$ 1,360,728**	**$ 1,476,200**	**$ 1,424,700**	**$ 1,466,700**	**$ 1,550,270**	**$ 1,493,100**	**$ 1,493,100**	**$ 1,718,100**	**$ 1,839,621**	**$ 1,837,300**	**$ 1,837,300**	**$ 1,837,300**	**$ 1,967,384**	**$ 1,964,900**	
	Estimated Total Annual Cost				**$ 290,000**				**$ 5,285,023**				**$ 5,934,770**				**$ 6,888,121**				**$ 7,606,884**	**$ 25,968,900**

Notes:

Budgeting and Basin Assessments to fund projects subject to Watermaster Board approval following Committee Consultation.

SOW = Scope of Work

RFP = Request for Proposal

Project costs are estimates and subject to change as additional development is conducted.

a For budget forecasting purposes, assumes incentive amount of $1,395 (CMWD Tier 1 cost of $1,895 - $500 pumping cost per AF) for 3,140 AF in lieu water annually. Actual pumping cost to be determined during project development. CMWD Tier 1 cost presumed to increase average of 7% per calendar year.

b Watermaster administration costs are placeholder estimates.

c For budget forecasting purposes, assumes a price of $100/AF and an annual purchase of 4,700 AFY from the City of Simi Valley.

d Long-term costs are not known and will be defined through the initial study and Board policy. For forecasting purposes, assumes $100,000 annual cost for Pilot Study and $1,000,000 annual cost for full program implementation.

Agency Activities (Administration, Consultant / Contractor Procurement, Water Negotiations, Legal, Coordination)

Feasibility study

Construction or initial phase(s) of implementation

Operation and maintenance, or ongoing program implementation / evaluation

DRAFT LAS POSAS VALLEY WATERMASTER RESPONSE REPORT

Date: May 03, 2025

To: Las Posas Valley Watermaster Board of Directors

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

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

The Las Posas Valley Watermaster (Watermaster) requested consultation from the Las Posas Valley Policy Advisory Committee (PAC) on the draft Las Posas Valley (LPV) Basin Optimization Plan (draft BOP or dBOP). Watermaster's request was transmitted in a December 12, 2024, memorandum to PAC.

The PAC discussed and developed its recommendation report at the December 19, 2024, January 9, 2025, January 22, 2025, and February 6, 2025, meetings. PAC's February 6, 2025, recommendations report included six recommendations and an attachment with 99 comments by specific PAC members on specific sections of the draft BOP. Each of the six recommendations is listed below, followed by Watermaster's response. Watermaster's responses to the 99 specific recommendations are included in the attached table.

RECOMMENDATION 1: PURSUE PROJECTS AND PROGRAMS THAT ARE LOW-COST, READILY IMPLEMENTABLE, AND OPERATIONALLY FLEXIBLE

Projects selected for inclusion in the BOYS, as recognized by the BOP in Section 1.1 and 2.1, and prioritized for development and implementation, should meet the criteria established by Section 5.3.2.2 of the Judgment, that they be "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." With this in mind, the PAC approached review of the proposed projects and programs against three criteria: cost; time to water supply production; and operational flexibility. Projects that meet these criteria, especially ones that are able to be implemented in short order, could provide immediate positive impacts. Such "quick wins" could demonstrate our collective capacity to develop solutions and encourage the necessary confidence in the process to persist through to basin sustainability.

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

Projects that are costly, have long lead times, and result in significant built infrastructure that eats up scarce available capital, incur the operational cost of rampdown over the design and construction period, and create institutional inertia. Projects with implementation timelines and benefit realization horizons that extend beyond 2040 do not help achieve the goals of the GSP or the Judgment.

Projects that are only fully optimized with the development of other projects can create perverse incentives, hardening commitment to decisions even a□er more cost-effective alternatives are identified.

Response to Recommendation 1:
Watermaster agrees with PAC's recommendations that projects selected as Basin Optimization Projects should meet the criteria in the Judgment sections 5.3.2.1 and 5.3.2.2. The project evaluation criteria developed for the BOP, with Committee consultation and Watermaster Board concurrence, provide the basis for scoring and ranking the evaluated projects. Unlike the draft BOP, the final BOP explicitly identifies the projects recommended for implementation as Basin Optimization Projects. Additionally, projects that are dependent on other unfunded projects to achieve full benefits were reevaluated and ranked based on their merits as stand-alone projects. Lastly, the two data-gap projects, Project 9, Construction of Additional Dedicated Groundwater Monitoring Wells, and Project 10, Installation of Transducers in Groundwater Monitoring Wells, were removed from the BOP in response to Technical Advisory Committee (TAC) recommendation. Data-gap projects will be addressed separately from the BOP in a technical memorandum. Projects 2, 7, and 8, are included in the five recommended Basin Optimization Projects for implementation based on evaluation scoring along with Project 5, Arroyo Simi-Las Posas Water Acquisition, and a new Project 9, Regional Desalter Feasibility Study.

RECOMMENDATION 2: RECONSIDERATION OF "READY TO IMPLEMENT" PROJECTS
The PAC has reviewed the information for the three prioritized projects (Projects 1, 2, and 5) for inclusion in the BOYS and has reservations that those projects "…are sufficiently defined to implement without additional feasibility studies to define project scopes, costs, and benefits" as described in the dBOP. The dBOP acknowledges the PAC's observations that the costs for these projects have not been adequately researched (e.g., water purchase costs from City of Simi Valley are not known, costs for purchasing water from CMWD are unrealistically assumed to be constant through 2029) and the magnitude of the benefits may be dependent on the implementation of other projects that will not be prioritized in the BOYS. **The PAC recommends that the classification of Projects 1, 2, and 5 as "…sufficiently defined to implement…" be revisited and that these projects undergo further scope and cost development prior to consideration for implementation.**

Response to Recommendation 2:
The Project Prioritization section of the final BOP has been significantly revised from the draft and projects are no longer separately identified as "water supply projects" or "feasibility study and data gap projects." As discussed in the response to Recommendation 1, data gap projects have been removed from the BOP and will be considered separately. The final BOP no longer includes classification of projects as "…sufficiently defined to implement…" and identifies that most of the projects require additional scope definition, program policy development, and/or full feasibility studies. Three projects and two feasibility studies were selected for inclusion in the Basin Optimization Plan as Basin Optimization Projects. The three projects are Project 2, Purchase of Imported Water from CMWD for Basin Replenishment, Project 5, Arroyo Simi-Las Posas Water Acquisition, and Project 8, Allocation Buyback and Reduction Program (name changed from Developing a Least Cost Acquisition Program in response to PAC member comment). Each of these

projects includes an initial program development phase, or agreement negotiation in the case of Project 5. The projected CMWD water purchase cost has been increased each year in the 5-year basin optimization project budget based on recent average rate increases.

RECOMMENDATION 3: PROVIDE DETAILS ON ANTICIPATED PROJECT COSTS AND POTENTIAL FUNDING SOURCE

Cost information was lacking for many projects, which makes it difficult to evaluate the cost/benefit relationship and to perform comparisons between the various projects. The lack of cost information, even at the placeholder level, skews the cost factor used in the project ranking. **The PAC recommends that all various costs, including operation and maintenance and ancillary construction costs (even as a range of costs, if necessary), be included in the dBOP to help stakeholders understand the potential range of project costs.** It is recognized that the anticipated costs included in the dBOP would be placeholders and would be updated as the project scope matures and modeling or feasibility results become available.

In addition, the dBOP should include a section on potential funding mechanisms/sources for each project. As currently written, stakeholders cannot discern what entity(-ies) would be fiscally responsible for implementation, operations, and maintenance of all the projects/programs described.

Response to Recommendation 3:

Known cost information is included in the Cost and Funding sections of each project evaluation in the final BOP. Text has been added to explicitly identify that funding would need to come from Basin Assessment unless another funding source has been identified. The 5-year project implementation budget presented in Section 4 and Appendix D of the final BOP has been revised from the draft to include only the recommended Basin Optimization Projects. The 5-year implementation budget has been revised to include complete costs to the extent they have been identified. However, several of the projects include a first phase of project/ program development that will define the full project/ program scope which will define the full project cost. The costs of the five selected Basin Optimization Projects include capital and/or initial implementation costs, operation and maintenance or ongoing program implementation costs, Watermaster administration costs, and other identified costs, as applies to each specific project.

RECOMMENDATION 4: PROVIDE DETAILS ON HOW THE BOP WOULD BE PERFORMED

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

Response to Recommendation 4:
Section 3, Basin Optimization Project Implementation, has been significantly revised and expanded in the final BOP. A complete 5-year implementation plan has been included for the five selected Basin Optimization Projects. The implementation plan outlines implementation tasks on a quarterly basis for the first fiscal year, beginning July 1, 2025, and annually for the next four fiscal years. The Schedule to Implement the Basin Optimization Projects in Appendix C has been revised consistent with the implementation plan. Additionally, the 5-Year Project Implementation Budget in Section 4 and Appendix D has been revised and updated consistent with the Basin Optimization Project implementation plan.

RECOMMENDATION 5: DATA MINE EXISTING WATER LEVEL DATA SETS
The PAC noted that the intentions of projects 9 *(Construction of additional dedicated groundwater monitoring wells)* and 10 *(Installation of transducers in groundwater monitoring wells)* are critical and vital to long term success. High-quality data that is spatially distributed both geographically and in multiple aquifers is key to understanding how the basin responds to management actions.

The PAC understands the need to expand the monitoring network, but wonders, given the abundance of wells in the Las Posas Basin, there may be other options besides constructing new monitoring wells, such as exploring the extent to which existing wells can be modified for inclusion in the monitoring network. **The PAC recommends that new monitoring wells should be considered to fill important data gap areas that need additional information, but only after an exhaustive review of the existing wells in the basins is performed to determine if those wells are suitable additions to the monitoring network.**

The PAC recognizes that the use of irrigation or municipal wells that may be screened across multiple aquifers is less desirable than aquifer-specific monitoring wells. However, irrigation and municipal wells are important additions to monitoring programs in many groundwater basins. The PAC is aware of well owners in the LPV who record and maintain water level data for their wells and is willing to assist the Watermaster in identifying those well owners.

The PAC recommends that the TAC, in consultation with Watermaster staff and Dudek, identify locations (geographical and hydrogeological) where additional monitoring would be beneficial, provide those locations to the PAC, and allow the PAC to identify existing wells that may be viable candidates for modification and inclusion in the network.

Response to Recommendation 5:
In response to TAC recommendation, the two data-gap projects, Project 9, Construction of Additional Dedicated Groundwater Monitoring Wells, and Project 10, Installation of Transducers in Groundwater Monitoring Wells, have been removed from the BOP. The data-gap projects will be addressed in a separate technical memorandum which will provide opportunity for further Committee Consultation with the PAC and TAC on these projects.

RECOMMENDATION 6: PROJECT BENEFIT INTERDEPENDENCIES SHOULD BE CLEARLY ANALYZED
Full realization of some of the project benefits are dependent on the implementation of other projects. These dependencies can increase the complexity and potentially the costs of individual

projects (e.g., two projects must be implemented to achieve the full project benefits). **The PAC recommends that the project interdependencies be clearly communicated and that the project descriptions include language about the interdependencies and how the interdependencies impact the implementation and operations and maintenance costs.**

Response to Recommendation 6:
Watermaster agrees with PAC's concerns regarding discussion and evaluation of interdependent projects. The final BOP includes expanded narrative addressing interdependencies and includes a new table (Table 2) that clearly identifies these interdependencies and summarizes the additional water supply of the project alone and with other project(s). Further, projects that are dependent upon other unfunded projects are evaluated and ranked in the final BOP based on their merits as stand-alone projects.

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

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Recommendation	Comment Response
CMWD-1	Ian Prichard, Calleguas	Policy	Overarching				The biggest problems the basin faces are the two pumping depressions, one in the northern ELPMA and one in the eastern WLPMA. Watermaster and its stakeholders should be laser-focused on solving these two problems. However, the current draft of the Basin Optimization Plan is not a solution-oriented document that is recognizable as a "plan." It is instead a list of projects, some of which, even if built or implemented, would not address the pumping depressions. None of these projects is cheap; building ones that don't solve the problem isn't just expensive, but wasteful and counterproductive. The BOP should describe and rank the problems we are trying to solve, match projects to the problems they solve, and promote those that solve the biggest problems.	The BOP has been extensively revised in response to comments and includes selection of projects that address Basin challenges.
CMWD-2	Ian Prichard, Calleguas	Editorial	define WWDs	4	2.1.4	*"Additionally, this category is used identify whether the collaboration, cooperation, or participation of the FCGMA, Calleguas Municipal Water District (CMWD), WWDs , United Water..."*	Define "WWDs". I assume it's Waterworks District, but it's not used elsewhere	Reference to "WWDs" is from the Judgment. Definition of WWDs has been added to the Acronyms and Abbreviations list.
CMWD-3	Ian Prichard, Calleguas	Policy	planning assumptions	4	2.2.1	*"Arundo donax (Arundo) would be replaced with native riparian plant species, which are estimated to consume approximately 6 to 25 AFY per acre less water than Arundo (VCWSD 2015)."*	This is a massive range. Is there anything more specific for which native plants would replace the arundo, provided it can be removed and kept in abeyance? What's the mix of native plants and the resulting ET savings from that mix that gets us to 8.27 AF/acre savings? I see the reference below to the Wildscape feasibility study—from 2015. Is there anything new in the last decade that *demonstrates* water savings? Something based on an implemented and longstanding removal project rather than a feasibility study?	It is correct that published amounts of ET for Arundo vary significantly. Much depends on the density of Arundo and other site-specific conditions. Proposed Phase I of the project includes updated mapping of Arundo densities.
CMWD-4	Ian Prichard, Calleguas	Policy	planning assumptions	5	2.2.1.1	*"Implementation of this project could increase recharge to the ELPMA by as much as 2,680 AFY (VCWSD 2015). This is based on the estimated reduction in evapotranspiration demands associated with the project, or portion of which would occur upstream of the LPVB (VCWSD 2015). Additional modeling is required to characterize the volume of water that would recharge the ELPMA.*	If 2,680 is estimated high end of ET savings in Arroyo Simi, how do we know that much will be available for recharge? It would be more accurate to say "as much as 2,680 AFY may be available in Arroyo Simi for downstream recharge." Per the last sentence in this paragraph, more modeling is necessary to have a sense of how much may actually end up in the aquifer.	This section has been revised to state that recharge could be increased by as much as 2,680 AFY if implemented with a companion project such as the Moorpark Desalter to increase the available groundwater storage space in the ELPMA. As a stand-alone project, this project would not provide significant additional water-supply benefit to the LPV Basin.
CMWD-5	Ian Prichard, Calleguas	Policy	planning assumptions	5	2.2.1.2	*"This project relies on existing technology and similar projects have been implemented across the Ventura Watershed by various local interests (e.g., Ventura County Public Works Agency, various developers, Rancho Simi Recreation and Parks District, and others)."*	Recommend using results from similar projects that have been implemented across the Ventura Watershed to inform math on water savings/increased contributions to the creek, rather than a 2015 feasibility study.	It is correct that published amounts of ET for Arundo vary significantly. Much depends on the density of Arundo and other site-specific conditions. Proposed Phase I of the project includes updated mapping of Arundo densities.
CMWD-6	Ian Prichard, Calleguas	Policy	planning assumptions	5	2.2.1.2	*"While this project is not dependent on other unbuilt projects, the full benefits of this project may require implementation of other projects, like the Moorpark Desalter (Project No. 4), that lower groundwater elevations in the Shallow Alluvial Aquifer to increase available storage in the ELPMA and limit discharge of the increased arroyo flows downstream into the Pleasant Valley Basin."*	Knowing how much of the water saved from this Arundo removal project could end up in the LPV basin under various scenarios is the go/no-go question for this project. The sentence as written underplays the importance of that analysis.	Text has been revised to state that another project such as the Moorpark Desalter would be required to provide benefit to the ELPMA.
CMWD-7	Ian Prichard, Calleguas	Policy	cost assumptions	6	2.2.1.3	*"Assuming a 25-year project lifespan and that the project will increase recharge to the ELPMA by 2,680 AFY, the total cost to implement this project is estimated to be approximately $390 per AF."*	Recommend holding off on cost estimates until the modeling is done. Also, costs are based on a 2015 feasibility study and a wide range (6-25 AFY/acre) of savings. If we can find demonstrated savings in a comparable area, we will have higher confidence in the assumptions underlying the cost estimate.	This project is no longer recommended for inclusion in the BOP at this time. Discussion of costs remain as part of project evaluation, but only projects selected for inclusion in the BOP are now included in the Appendix C schedule and Appendix B 5-year budget.

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

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Recommendation	Comment Response
CMWD-8	Ian Prichard, Calleguas	Editorial	planning assumptions	7	2.2.2.1	*Water Supply*	The amount of imported water necessary to prevent minimum threshold exceedances in the WLPMA should be provided so the potential yield of this project is clear and definitive.	The comment extends beyond the scope of the BOP, the contents of which are set forth in section 5.3 of the Judgment. The results of the Basin Optimization Yield study can be used to refine future analyses in advance of the next BOP and Basin Optimization Yield study. Further, this project does not require capital expense and can be regularly reevaluated and amount of water purchased adjusted, as needed.
CMWD-9	Ian Prichard, Calleguas	Policy	planning assumptions	7	2.2.2.1	*"In 2019, it was estimated that 1,762 AFY of CMWD water would be available for purchase and delivery to Zone MWC and VCWWD-19."*	Where did this number come from?	The proposed annual in-lieu volume is based on the average deliveries during the 1995 through 2008 program and was agreed to for project planning purposes by CMWD and Zone MWC during GSP development.
CMWD-10	Ian Prichard, Calleguas	Editorial	planning assumptions	7	2.2.2.1	*"CMWD represented in recent consultation that the limiting factor is the volume of imported water the two purveyors can accept to offset their pumping in the WLPMA."*	There are other limiting factors to the supply: drought and an imported water outage. Calleguas's and Metropolitan's Water Shortage Contingency Plans (in their Urban Water Management Plans) describe the six water shortage stages and their potential impacts on water users. As recently as 2022, when the State Water Project allocation was only 5% for the second year in a row, Metropolitan enacted an Emergency Water Conservation Program that required significant demand curtailment. During such periods, in-lieu water may not be available. Other emergencies that interrupt imported water service would also constrain the availability of in-lieu water.	Text revised.
CMWD-11	Ian Prichard, Calleguas	Editorial/Policy	planning assumptions	7	2.2.2.2	*"This project would reinitiate a Metropolitan Water District of Southern California incentivized program implemented by CMWD that was operational in the WLPMA between 1995 and 2008."*	This references a program that no longer exists and cannot be reinstated.	Text revised.
CMWD-12	Ian Prichard, Calleguas	Editorial	Complexity analysis/comparison	7	All Projects	*"Project Complexity"*	Recommend some standardization of complexity discussion. Three projects don't offer a judgment on complexity; four are described as "moderately complex"; one is considered "low"; and two are described as "not technically complex."	Analysis of project complexity is defined in the Project Ranking Sheet included as Appendix A. The Project Ranking Sheet was updated through PAC & TAC consultation and Watermaster Board approval. All projects were evaluated and ranked for project complexity as indicated on the Project Ranking Sheets for each project included as Appendix B.
CMWD-13	Ian Prichard, Calleguas	Policy	planning assumptions	7	2.2.2.2	*"During development of the GSP, CMWD indicated that this project lifespan could exceed 50 years."*	The "could" in this sentence begs additional exposition. Recommend modifying this text to reflect that the reliability of getting imported water from CMWD is currently equal to the reliability of the State Water Project and Metropolitan Water District. Based on existing infrastructure, it is likely that "imported" water will continue to mean SWP water from MWD, and it is likely that it will be available for more than 50 years.	Text revised.
CMWD-14	Ian Prichard, Calleguas	Policy	project complexity	7	2.2.2.2	*"the full benefits of this project may require implementation of other projects, like the Moorpark Desalter (Project No. 4)"*	Relying on a groundwater extraction project (Moorpark desalter) to ensure optimum benefit significantly increases the institutional and implementation complexity of this project.	This appears to be misquoted text as it does not appear in the referenced section. Project 2 is not dependent on other projects.
CMWD-15	Ian Prichard, Calleguas	Editorial		7	2.2.2.3	*"This cost includes O&M to maintain CMWD's conveyance infrastructure."*	Whis is only this portion of the rate called out?	Sentence deleted.
CMWD-16	Ian Prichard, Calleguas	Editorial	costs	7	2.2.2.3	*"The project is envisioned to incentivize VCWWD-19 and Zone MWC by funding the difference between the cost of CMWD and the cost of pumping."*	Clarify that the incentive would come from WM via funds raised as part of basin assessment. It will not be provided by CMWD.	Text revised.

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

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Recommendation	Comment Response
CMWD-17	Ian Prichard, Calleguas	Policy	cost assumptions	7	2.2.2.3		The paucity of dollar signs in this paragraph is striking, especially compared with 2.2.1.3, a project that is more conceptual and conditional. Finding out how much it costs VCWWD-19 and Zone to pump is straightforward—and critical to determining whether/how much to buy.	Pumping cost and incentive amount will be determined in the first phase of this project. Text has been revised for two project phases.
CMWD-18	Ian Prichard, Calleguas	Policy	cost assumptions	7	2.2.2.3	*""The project is envisioned to incentivize VCWWD-19 and Zone MWC by funding the difference between the cost of CMWD and the cost of pumping."*	It needs to be clear that Calleguas's water would be purchased at the full Tier 1 rate and any financial incentive would be provided by the Watermaster using funds from the basin assessment.	Text revised.
CMWD-19	Ian Prichard, Calleguas	Policy	cost assumptions	9	2.2.3.3	*"VCWWD-1 estimates that the capital cost to construct this project is approximately $4,000,000. O&M costs have not been estimated."*	2.2.3.2 states that the GMA recommends modeling to estimate amount of recharge that would stay in the ELPMA. What is the cost estimate for this modeling and can we include it here?	Because this project would not be expected to provide significant benefit to the Basin unless a companion project is implemented to provide additional groundwater storage space, it is not recommended for consideration at this time. Text has been revised accordingly.
CMWD-20	Ian Prichard, Calleguas	Editorial/Policy	project benefits	10	2.2.4	*"...reduce the dependence on imported water in the LPVB by providing new local potable supplies."*	There needs to be some way to recognize that different constituents may have different goals. There is a tension between this project, or at least this goal for this project, and projects that bring additional imported water supplies into the basin.	The Moorpark Desalter project as presently defined would not appear to provide additional water supply benefit to the Basin. A new project for a feasibility study of a potential regional desalter has been added to the BOP.
CMWD-21	Ian Prichard, Calleguas	Policy	cost assumptions	10	2.2.4	*"Additionally, this project may require construction of additional pipeline to connect the desalter's brine disposal system to CMWD's Salinity Management Pipeline, which discharges brine from various desalters and water treatment plants to the Pacific Ocean."*	The project would definitely require construction of additional pipeline to connect the desalter's brine disposal system to the Salinity Management Pipeline (SMP), which currently terminates near Los Angeles Ave. and La Cumbre Rd. An SMP Discharge Station would also be required, which would contain metering and water quality sampling equipment.	Text revised.
CMWD-22	Ian Prichard, Calleguas	Editorial/Policy	project benefits	10	2.2.4.1	*"...pumping 6,270 AFY for the desalter project would result in an additional 2,200 AFY of recharge to the ELPMA. Based on this, it is estimated that this project would increase the sustainable yield of the ELPMA by 2,200 AFY."*	Please explain how 6,270 AFY of pumping to make room for 2,220 AFY of recharge increases the sustainable yield.	Text has been revised to reflect potential negative impact to ELPMA water supplies as the difference between VCWWD-1's "likely request" for an additional 5,000 AFY of allocation and the additional 2,200 AFY of potential recharge, or -2,800 AFY. Project scoring has been revised.
CMWD-23	Ian Prichard, Calleguas	Editorial	project status	10	2.2.4.2	*"VCWWD-1 has not completed a feasibility study for this project."*	2.2.4.1 references "preliminary numerical groundwater flow modeling." 2.2.4 intro states "Preliminary analyses for the proposed desalter have been completed and the project is in the planning phase."	Text has been clarified to state that "other than preliminary groundwater modeling conducted in 2016, VCWWD-1 has not completed a full feasibility study for this project."
CMWD-24	Ian Prichard, Calleguas	Policy	planning assumptions	10	2.2.4.2	*"This project is not dependent on other unbuilt projects or projects that are currently under construction."*	As stated above, the SMP does not extend to the Moorpark Desalter location and several miles of additional pipeline would need to be constructed to serve the Moorpark Desalter. The last sentence of this paragraph states "VCWWD-1 may need to develop an agreement with CMWD to dispose of brine produced at the desalter via CMWD's Salinity Management Pipeline." There are other options besides the SMP for disposing of brine (though how they compare to the SMP is unclear), but if VCWWD-1 wants to use the SMP to dispose of its brine, it would definitely require an agreement with Calleguas to do so.	Text revised.
CMWD-25	Ian Prichard, Calleguas	Policy	project benefits	11	2.2.4.4	*"reduce the dependence on imported water in the LPVBLPV by providing new local potable supplies "*	see comment IP-13 re: 2.2.4	See response to CMWD-20.
CMWD-26	Ian Prichard, Calleguas	Editorial		11	2.2.4.4	*"Depending on the operational conditions and distribution of desalted water, this project ."*	sentence incomplete	This section has been revised.

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

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Recommendation	Comment Response
CMWD-27	Ian Prichard, Calleguas	Policy	project benefits	12	2.2.5	*"...leaving 2,200 to 3,700 AFY available as surface flow and recharge to the ELPMA."*	Is "surface flow" the same as "recharge"?	Not all surface flow results in recharge. The next section 2.2.5.1 clarifies that modeling suggests that this volume of flow results in as much as 2,200 AFY of increased sustainable yield to the ELPMA.
CMWD-28	Ian Prichard, Calleguas	Policy	project benefits	12	2.2.5.1	*"...implementation of this project could increase the sustainable yield of the ELPMA by as much as 2,000 AFY."*	The water is flowing today. How does developing an agreement with Simi to ensure it continues to flow *increase* sustainable yield—at all, let alone by 2,000 AFY?	Text has been clarified to state that loss of this flow could result in a decrease in sustainable yield by as much as 2,200 AFY.
CMWD-29	Ian Prichard, Calleguas	Policy	project benefits	12	2.2.5.2	*" the full benefits of this project may require implementation of other projects, like the Moorpark Desalter (Project No. 4), which lowers groundwater elevations in the Shallow Alluvial Aquifer"*	The water is not "additional" unless and until it has a place to go that it doesn't now.	Text referencing Project 4 has been removed. This project would maintain existing flow and recharge.
CMWD-30	Ian Prichard, Calleguas	Policy	cost assumptions	13	2.2.5.3	*"...FCGMA anticipates that this water will cost less than the $500/AF evaluation criterion..."*	What is the basis for this assumption? What cost are we assuming for the budgeting? Recycled water goes for much higher than this in other parts of the state--in fact, just a few miles down the 101. Offers have been made to the City of Simi Valley to tie up this water, and yet it has not been tied up. Calleguas currently has an agreement with the City to buy recycled water for more than $1,100/AF.	The AF cost of requiring the City to continue discharging from the SVWQCP to the Arroyo Simi will not be known until an agreement is negotiated. For purposes of project scoring and budgeting, a cost $100/AF for the full 4,700 AF is assumed.
CMWD-31	Ian Prichard, Calleguas	Policy	project benefits	13	2.2.5.4	*"... this project would maintain native habitat..."*	What is the definition of "native habitat"? The second sentence of this paragraph states that "perennial flow... did not begin until the 1970s." Also, without Arundo removal, the water will also maintain invasive species.	The text has been revised to: "Additionally, this project would maintain habitat that has developed since SVWQCP discharges upstream of the ELPMA resulted in perennial flow in Arroyo-Simi Las Posas."
CMWD-32	Ian Prichard, Calleguas	Editorial		14	2.2.6.2	*"FCGMA anticipates that implementation of Phase I could be completed within a 2-year timeframe following commitment of funds for the feasibility study."*	Whose commitment?	Project costs would need to be funded through Basin Assessment. Text revised accordingly.
CMWD-33	Ian Prichard, Calleguas	Editorial/Policy	cost assumptions	15	2.2.6.2	*"may be required to construct, operate, and maintain desalter facilities "*	Who would pay for these?	Project costs would need to be funded through Basin Assessment. Text revised accordingly.
CMWD-34	Ian Prichard, Calleguas	Editorial/Policy	planning assumptions	15	2.2.6.3	*"Additionally, this does not include any costs required to construct, operate, and maintain local desalters to treat the recycled water to levels suitable for irrigation..."*	Whose responsibility is it to maintain what level of service?	The need for associated desalter(s) is presently not known and would need to be evaluated in the phase I feasibility study.
CMWD-35	Ian Prichard, Calleguas	Editorial/Policy	planning assumptions	15	2.2.6.3	*"... and to avoid significant and unreasonable degradation of water quality."*	Whose responsibility is this? And of what "water"? This seems like a different goal than irrigation water quality depending on what water we're talking about.	The potential for degradation of groundwater quality would need to be evaluated in the phase I feasibility study.
CMWD-36	Ian Prichard, Calleguas	Policy	planning assumptions	15	2.2.7	*feasibility study*	It is unclear why a feasibility study is needed. In lieu deliveries have been made to Ventura County Waterworks District No. 1 in the past and the infrastructure remains in place.	The average in-lieu deliveries from the 1995-2007 program have been added to Project 2. The Project 7 feasibility study will evaluate other potential water sources and new infrastructure that may be needed to expand the program.
CMWD-37	Ian Prichard, Calleguas	Policy	planning assumptions	16	2.2.7.1	*Water Supply*	Consideration could also be given to directly injecting imported water into Calleguas's Las Posas Aquifer Storage and Recovery Wellfield.	Consideration of utilizing CMWD's ASR project should be deferred until the Calleguas ASR Project Operations Study is completed, which is required by the Judgment.
CMWD-38	Ian Prichard, Calleguas	Policy	planning assumptions	16	2.2.7.1	*Water Supply*	The amount of imported water necessary to prevent minimum threshold exceedances in the ELPMA should be provided so the potential yield of this project is clear and definitive.	Evaluation of the amount of in-lieu deliveries to address chronic groundwater declines is part of the scope of the feasibility study as stated in section 2.2.7.5. Additional text has been added for clarity.
CMWD-39	Ian Prichard, Calleguas	Editorial		17	2.2.7.4	*Benefits...*	there doesn't appear to be text in this section	This section has been completed.

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

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Recommendation	Comment Response
CMWD-40	Ian Prichard, Calleguas	Policy	project benefits	17	2.2.7.5	*"... the potential increase to the sustainable yield of the ELPMA."*	How would it increase sustainable yield? It would offset pumping or shift pumping or add to total water use in the basin, but it doesn't increase "yield."	From section 2.2.7.5: "This feasibility study is expected to provide a clear understanding of volume of supplemental water supplies, and corresponding piping infrastructure, required to offset groundwater demands and maintain groundwater elevations above the minimum thresholds in the northern portion of the ELPMA."
CMWD-41	Ian Prichard, Calleguas	Editorial		18	2.2.8.4	*Benefits...*	there doesn't appear to be text in this section	Text has been completed in this section.
CMWD-42	Ian Prichard, Calleguas	Editorial	CEQA	19	2.2.9.2	*"CEQA and NEPA are not required to implement this project."*	CEQA does apply, even if only to file an NOE	Good point, however, the two data gap projects identified as Projects 9 and 10 in the draft have been removed from the BOP based on TAC recommendation.
CMWD-43	Ian Prichard, Calleguas	Editorial	grants	20	2.2.9.3	*"however, Watermaster staff continuously monitor for potential grant funding"*	This should be a blanket statement made at the top of the document or in every Cost and Funding subsection	Statement added to section 2.1.3.
CMWD-44	Ian Prichard, Calleguas	Policy	collaboration	20	2.2.9.4	*Collaboration Requirements*	Calleguas already operates a monitoring network comprised of nested, clustered, and individual monitoring wells, as well as monitors wells owned by others. Any monitoring efforts should be closely coordinated with Calleguas to prevent unnecessary duplication.	The two data gap projects identified as Projects 9 and 10 in the draft have been removed from the BOP based on TAC recommendation.
CMWD-45	Ian Prichard, Calleguas	Policy	collaboration	20	2.2.10	*groundwater monitoring*	Like Project 9, this needs to be done in strong coordination with CMWD.	The two data gap projects identified as Projects 9 and 10 in the draft have been removed from the BOP based on TAC recommendation.
CMWD-46	Ian Prichard, Calleguas	Editorial	planning assumptions	22	2.3.1	*"Three projects are sufficiently defined to implement without additional feasibility studies to define project scopes, costs, and benefits."*	See notes to Project No. 2, which would require additional analysis to identify current demands, which will impact costs and benefits. Likely won't rise to the level of a feasibility study, but will require some refinement.	Project 2 has been revised to include two phases with a first phase to develop program policy, determine pumping costs and amount of incentive, allocation of funds, and incentivization agreements to purchase water from CMWD.
RG-01	Rob Grether	Editorial	Watermaster or FCGMA	1	1.1	*As outlined in the Judgment, FCGMA, in consultation with the LPV Policy Advisory Committee (PAC) and Technical Advisory Committee (TAC), is responsible for developing a Basin Optimization Plan for the LPV.*	5.3.1 states "Watermaster shall...develop and maintain a Basin Optimzation Plan." While FCGMA is currently serving as Watermaster, this sentence and others like it should be changed to match the Judgment.	Revised.
RG-02	Rob Grether	Editorial	Text from 5.3.2.1	1	1.1	*Criteria for determining the priority and feasibility of each Basin Optimization Project;"*	5.3.2.1 specified the criteria that are to be used for determining the prority and feasibility of each project. As written, it suggests the FCGMA will be setting the criteria instead. The criteria specified in the Judgment should be repeated here so a reader doesn't have reference the Judgment to know if projects in the BOP conform: "Citeria for determining the priority and feasibility of each Basin Optimization Project...shall include, but not be limited to, the estimated amount of yield augmentation, cost effectiveness, cost feasibility, technical/engineering feasibility, project implementation timing, benefits relative to the achievement of Sustainable Groundwater Management, and whether the collaboration, cooperation, or participation of the FCGMA, Calleguas, WWDs, United Water Conservation District, or the Water Right Holders is necessary or desirable for implementation of the Basin Optimization Project.	Full text of BOP elements from Judgment section 5.3.2 added to BOP section 1.1.
RG-03	Rob Grether	Editorial	Specific text from 5.3.2.2	1	1.1	*A description of Basin Optimization Projects;*	should be modified to include full text from 5.3.2.2: "A description of Basin Optimization Projects that are likely to be practical, reasonable, and cost-effective to implement prior to 2040 to maintain the Operating Yield at 40,000 AFY or as close thereto as achievable."	Full text of BOP elements from Judgment section 5.3.2 added to BOP section 1.1.

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

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Recommendation	Comment Response
RG-04	Rob Grether	Editorial	Specific text from 5.3.2.5	1	1.1	*A schedule for the Basin Optimization Projects which are to be evaluated, scoped, designed, financed, or developed; and*	include full text emphasizing need to coordinate timelines with other agencies: "5.3.2.5. A schedule for the Basin Optimization Projects which are to be implemented to be evaluated, scoped, designed, financed, and developed. If the collaboration, cooperation, or participation of the FCGMA, Calleguas, WWDs, United Water Conservation District, or the Water Right Holders is necessary or desirable for any evaluation, scoping, design, financing, and development of any Basin Optimization Project, the schedule shall so consider the time necessary for such collaboration or cooperation; and	Full text of BOP elements from Judgment section 5.3.2 added to BOP section 1.1.
RG-05	Rob Grether	General Editorial	Criteria from 5.3.2.1	6 and others	2.2	*Benefits relative to Sustainable Groundwater Management*	This criterion is specified in 5.3.2.1 but missing from projects 1 - 6, 9, 10	Text has been completed for these projects.
RG-06	Rob Grether	Technical	Arundo removal math	4	2.2.1 and 2.2.1.1 and 2.2.1.4	*The Arroyo Simi–Las Posas Arundo Removal Project involves removal of the invasive plant species Arundo donax from approximately 324 acres of land along the Arroyo Simi-Las Posas corridor. Arundo donax (Arundo) would be replaced with native riparian plant species, which are estimated to consume approximately 6 to 25 AFY per acre less water than Arundo (VCWSD 2015). If all of the Arundo within the 324-acre area is removed, this project could result in up to an additional 2,680 AFY of recharge to the ELPMA (VCWSD 2015).*	The math doesn't track. If arundo removal can result in between 6 and 25 AFY per acre less water, that would mean a range of 1,404 to 5,850 AFY, yet in 2.2.2.1 it says project could result in "as much as 2,680 AFY." If additional assumptions are being made that further reduce the potential water savings, they should be identified and the math should be clearly described. And then in 2.2.1.4 it says Arundo uses 1,900 AFY more than native riparian species. Would the plan be to plant native riparian species in place of the Arundo? If so, what is the cost. If not, why mention this?	Text states that water consumption (ET) of Arundo is 6 to 25 AFY per acre more than native riparian plant species. Reducing vegetative consumption does not equate to a 1:1 increase in available groundwater. The 2,680 AFY amount of increased recharge to the basin is based on numerical groundwater modeling to estimate the benefit. Estimates show that up to 1,900 AFY of increased recharge could occur in the portion of the Arroyo Simi-Las Posas within the ELPMA and an additional 780 AFY of flow in the Arroyo Simi in the upstream Simi Valley Basin. The plan includes replacing Arundo with native riparian species. Note that significant project benefits would only be realized with a companion project to create more available groundwater storage space.
RG-07	Rob Grether	Technical	Arundo removal math	4	2.2.1	*FCGMA estimates the total cost to implement this project is approximately $390 per AF*	The estimated cost only holds if the yield is 2,680 AF. It should be clearer that it could be much higher per AF if actual infiltration does not hit the target.	The project evaluation has been revised to evaluate the project as a standalone project.
RG-08	Rob Grether	General Technical	Permitted cost and time delays	4, 9	2.2.1 & 2.2.3.2		Some projects (e.g., Arundo removal, stormwater diversion, fish ladder construction) can trigger lengthy permit reviews by multiple agencies. The Plan should underscore how that could affect both scheduling and total cost.	Other Arundo removal projects in the County have not encountered significant permitting hurdles. Specific permitting requirements would be determined in Phase I of the project.
RG-09	Rob Grether		Number formatting	6	2.2.1.3	*$9,100,00 and an O&M cost of $250 per acre-foot (AF) of water.*	I think there is a missing 0	Zero has been added.
RG-10	Rob Grether	General Editorial	CMWD cost clarity	6	2.2.2	*During development of the GSP … 1,762 AFY of CMWD water would be available … The project is envisioned to incentivize VCWWD-19 and Zone MWC by funding the difference between the cost of CMWD and the cost of pumping.*	The estimated cost of pumping should disclosed so that stakeholders are clear what the net cost per AF would likely be if this project were pursued. Stakeholdres may not have an appetite for water at this cost and would opt instead to face rampdown to lower allocations.	Pumping cost and incentive amount will be determined in the first phase of this project. Text has been revised for two project phases.
RG-11	Rob Grether	Editorial	CMWD importation limitations	7	2.2.2.1	*CMWD represented in recent consultation that the limiting factor is the volume of imported water the two purveyors can accept to offset their pumping in the WLPMA. FCGMA used these projections for analysis of the project for this Plan.*	More information on the limitations should be provided. Can the limitation be mitigated through investment in infrastructure? What would the cost be?	Additional clarification has been included in text: "CMWD represented in recent consultation that the limiting factor is the volume of imported water the two purveyors can accept to offset their pumping in the WLPMA. FCGMA used these projections for analysis of the project for this Plan, however, the volume of in lieu water delivered during the 1995 through 2008 program through existing infrastructure was sufficient to mitigate the pumping depression. Additionally, Zone MWC is currently upgrading its main pipeline which will increase it's the quantity of water it can receive from CMWD. "

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

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Recommendation	Comment Response
RG-12	Rob Grether	Misc	Storm water recharge	8	2.2.3	*Arroyo Las Posas storm water capture and recharge*	Similar to this project, I propose establishing a voluntary program to incentivize landowners in both the East and West Las Posas Management Areas (ELPMA and WLPMA) to capture stormwater runoff on their properties, particularly from local barrancas and canyons. Under this program, participating landowners would construct or expand small retention ponds or infiltration basins and receive financial compensation for each acre-foot of stormwater successfully recharged to the basin. This distributed approach can supplement larger-scale recharge initiatives, reduce peak flows downstream, and help sustain groundwater elevations above SGMA thresholds. In addition to augmenting groundwater supplies, the program could yield co-benefits such as reduced soil erosion, enhanced flood protection on private lands, and improved habitat for local wildlife. To ensure transparency and effectiveness, a straightforward protocol would be developed for measuring and verifying infiltration volumes (e.g., through metering or water-level data). Funding could come from Basin Assessment fees, grants, or local agency contributions, enabling partial or full reimbursement of capital costs to install or upgrade ponds. This model fosters local stakeholder engagement and shares the responsibility for achieving sustainable groundwater management—making it a cost-effective, community-based solution that builds resilience across the entire Las Posas Valley Basin.	This is an interesting project proposal which could be considered for subsequent to adoption of the current BOP. Such a program would require feasibility analysis likely including groundwater modeling to evaluate where such projects may benefit the sustainable management of the Basin, principally identifying whether such recharge would actually reach the aquifers of the Basin and particularly whether they would help mitigate groundwater levels in the eastern portion of the WLPMA or the northern portion of the ELPMA.
RG-13	Rob Grether	General Editorial		8	2.2.3	*could provide up to 2,000 AFY of diversions … No groundwater modeling has been conducted to characterize the storage capacity … or the volume of recharged water that would remain in the ELPMA.*	O&M is not yet estimated, but could be substantial (e.g. for sediment removal, fish ladder maintenance, pumping, etc.)	Agreed. This project is not presently recommended for consideration of implementation.
RG-14	Rob Grether	Technical		10	2.2.4	*6,270 AFY for the desalter project would result in an additional 2,200 AFY of recharge*	6,270 AFY pumping to net 2,200 AFY yield gain is a low ratio implying a big fraction of the pumped water may be brine or lost to discharge? That may be the case, but consider clarifying the mechanics and math.	Text has been revised to reflect potential negative impact to ELPMA water supplies as the difference between VCWWD-1's "likely request" for an additional 5,000 AFY of allocation and the additional 2,200 AFY of potential recharge, or -2,800 AFY. Project scoring has been revised.
RG-15	Rob Grether	Editorial		11	2.2.4.4	*Depending on the operational conditions and distribution of desalted water, this project.*	Sentence is truncated and missing the point.	This section has been revised.
RG-16	Rob Grether	General Technical	Limited Alternative Markets and Pricing Considerations	11	2.2.5	*The City has indicated that 3,000 AFY of recycled water from the SVWQCP would be available and 1,700 AFY would be available from the dewatering wells (FCGMA 2019). However, due to the riparian use of the water along the Arroyo Simi–Las Posas…*	While Simi Valley might theoretically sell its dewatering well flows, the 3,000 AFY of recycled water faces significant regulatory constraints and lacks other practical buyers. The City is already required—and pressured by environmental stakeholders such as The Nature Conservancy—to continue discharging a baseline flow into Arroyo Simi–Las Posas. This raises doubts about whether a true “market rate” exists for this water and whether paying for it in a purchase agreement might inflate its perceived value. The Watermaster and stakeholders should thus carefully evaluate the actual economic worth of this water before finalizing any deal.	We agree that the terms of an agreement would need to be carefully evaluated.
RG-17	Rob Grether	General Editorial	SVWQCP	11 & 13	2.2.5 & 2.2.6		Multiple projects rely on the same water source (e.g., SVWQCP discharge). If one project (e.g., pipeline deliveries) partially or wholly uses that water, the volumetric benefit for the other project (e.g., discharge acquisition in the arroyo) might drop. The Plan references this but could highlight the trade-off more prominently.	Agreed. Text has been revised.

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

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Recommendation	Comment Response
RG-18	Rob Grether	Technical	Simi pipeline cost clarity	15	2.2.6.3	*In 2017, the City indicated that approximately 3,000 AFY of recycled water would be available … Implementation in two phases … capital cost (Phase II) of $22.1 million … ~ $700/AF over 25 years … does not include cost to purchase or lease the water from the City or potential desalting costs.*	The $700/AF omits water purchase cost and potential on-farm or point of delivery desalting. This might push the cost well above other projects, perhaps even imported water through CMWD. The Plan should be very clear what the all-in cost could be with clear articulation of the discrete assumptions.	Agreed. Text and project scoring have been revised to show the $1,200/AF cost estimated in the 2017 study and that project cost may be more than that estimate. Updated project costs would need to be evaluated in the phase I feasibility study.
RG-19	Rob Grether	Editorial		17	2.2.7.4	*Benefits relative to Sustainable Groundwater Management*	Section is blank and needs to be completed - this is one of the criteria specified in 5.3.2.1	This section has been completed.
RG-20	Rob Grether	Editorial		18	2.2.8.4	*Benefits relative to Sustainable Groundwater Management*	Section is blank and needs to be completed - this is one of the criteria specified in 5.3.2.1	Text has been completed in this section.
RG-21	Rob Grether	General Technical	Data are critical	18	2.2.9	*Cost is approximately $50,000 for Phase I … $550,000 per well*	This project improves data quality, which has intangible but critical benefits for SGMA compliance. It should be more clearly emphasized that the cost, while high, is a fraction of the cost of mismanagement if data are lacking.	The two data gap projects identified as Projects 9 and 10 in the draft have been removed from the BOP based on TAC recommendation.
RG-22	Rob Grether	Editorial	Incusion in the BOY	22 & 23	2.3	*Recommendation for inclusion in the BOY*	It should be clear if a project is not "Recommended for Incusion in the BOY" if it is "not recommended for immediate implementation" vs. "not recommended at all"	Text clarified.
RG-23	Rob Grether	General Editorial	Integration of Milestones with SGMA Compliance and Cost-Benefit Tracking		4		In addition to the high-level quarterly budget estimates presented in Appendix D, it is important to recognize that many of these projects will run concurrently and interactively. Each has key milestones—for example, feasibility study completion dates, major construction phases, or regulatory approvals—that will determine whether a project continues as planned or requires adjustment. Simultaneously, the Judgment and SGMA impose their own milestones, such as interim sustainability targets and potential rampdowns of total pumping allocations. Accordingly, a phased investment approach—one aligned with these two sets of milestones—will allow the Watermaster and stakeholders to make more informed decisions. As data from feasibility studies or initial implementation efforts become available, it may confirm (or challenge) previous assumptions about costs, yield, and overall viability. If one project's actual benefits fall short of projections, there may be a need to reallocate resources to other projects with higher potential return. Conversely, if a project meets its early benchmarks and proves cost-effective, then accelerating its funding could help offset additional rampdowns in groundwater pumping or meet interim SGMA targets. By synchronizing project milestones with SGMA checkpoints—and embedding cost-benefit reassessments into each critical decision point—the Watermaster can better ensure that expenditures are directed to projects that deliver the best value for achieving sustainable groundwater conditions, rather than locking in a rigid spending plan detached from new information and evolving basin conditions.	Consistent with the Judgment, the schedule, budget and implementation plan sections and appendices of the BOP have been revised to include only the projects selected as Basin Implementation Projects for this initial BOP. This simplifies and more clearly lays out the project budgets, total budget, and milestone dates for stakeholders and the WM Board. Additionally, the next GSP evaluation likely will begin in 2028 when feasibility studies and project development should be completed which will inform synchronization with SGMA milestones.
RG-24	Rob Grether	Editorial	Least Cost Acquisition Program	17	2.2.8	*title: Developing a Least Cost Acquisition Program*	Project title matches the language from the Judgment, but it would be clearer if the title were: Allocation Buyback and Reduction Program.	Good suggestion. Project has been renamed.
RG-25	Rob Grether	General Editorial	Least Cost Acquisition Program		2.2.8.1	*Water Supply* *This project is a paper study to develop a Least Cost Acquisition Program. The study will not provide a new water supply or directly increase the yield of the LPV.*	Proposed expanded language: "Although this initiative does not create new water supply, it reduces pumping in water-deficit areas and may, in turn, improve groundwater levels. The net effect would be to promote storage recovery and stability within the basin. Where land is fallowed or production shifts away from high-water-demand crops, local pumping can be reduced—leading to higher overall water levels."	Text has been revised in this section.

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

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Recommendation	Comment Response
RG-26	Rob Grether	General Editorial	Least Cost Acquisition Program		2.2.8.2	*Timing and Feasibility section*	This section currently only includes a description of how FCGMA would spend time and money to evaluate how this kind of program would work. It would be valuable to also include some information on how a program would likely work to paint a clearer picture for Watermaster and stakeholders at this time. I propose adding details such us the following: **Policy Development** - The Watermaster, in consultation with the PAC and TAC, would set rules and pricing mechanisms that reflect basin needs, market conditions, and stakeholder interests. **Transaction Mechanics** - Purchases of allocation could occur via periodic reverse auctions or direct negotiation. Over time, the program would need to adapt if market conditions shift (e.g., drought, changing crop values). **Implementation Phases** 1) Feasibility and Structure: Define goals, purchase methods, funding sources, and monitoring protocols. 2) Pilot Transactions: Conduct limited initial buybacks or leases to gauge market response and refine policy. 3) Full Implementation: Roll out basin-wide or focus on specific water-deficit zones as conditions warrant. **Program Oversight** - Because economic and policy factors dominate this project's success, the PAC (in partnership with the Watermaster) should have a long-term oversight role—reviewing program performance, setting priorities for water-deficit areas, and advising on how to address unintended consequences (e.g., abrupt land-use changes).	These are good suggestions to start the discussion of program development. The proposed study is to develop the program policies and implementation process with PAC & TAC consultation for approval by the Watermaster Board. Text has been revised in response to recommendations.
RG-27	Rob Grether	General Editorial	Least Cost Acquisition Program		2.2.8.3	*Cost and Funding*	In addition to recognizing that the study could cost $100,000, expected but undefined cost components of a program like this should be included, too. For example: **Program Budget** - A dedicated fund (e.g., from basin assessments or grants) would be needed for purchasing allocations. **Administrative Costs** - The program requires ongoing administration to process transactions, verify compliance, and track water use. Unlike a single construction project, costs here are mostly operational and policy-driven over the long term. **Potential Grants or Offsets** - State or federal sources might help subsidize fallowing or land-use transitions that protect groundwater. **Economic Considerations - Land Fallowing and Local Economy** - If allocation sales result in idled land, regional employment and material purchases (e.g., fertilizer, seed, equipment) may decline. These impacts should be studied or mitigated through compensation programs or assistance in crop transitions.	See response to RG-27. These components will be developed through the study into Watermaster policy and an implementation plan.

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

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Recommendation	Comment Response
RG-28	Rob Grether	General Editorial	Broader Opportunity for Arundo Removal	4	2.2.1	*The Arroyo Simi–Las Posas Arundo Removal Project involves removal of the invasive plant species Arundo donax from approximately 324 acres of land along the Arroyo Simi-Las Posas corridor. Arundo donax (Arundo) would be replaced with native riparian plant species, which are estimated to consume approximately 6 to 25 AFY per acre less water than Arundo (VCWSD 2015).*	Although this project currently focuses on the Arroyo Simi–Las Posas corridor, Arundo donax also grows in numerous barrancas across private lands throughout the Las Posas Basin. Restricting removal efforts to a single waterway may limit potential water savings. If feasible, the project could be expanded to incentivize private landowners to remove Arundo on their properties and replace it with less water-intensive native riparian species in areas where the reduced evapotranspiration could increase Basin recharge. This broader, basin-wide approach would likely increase total recharge benefits, although it would also necessitate additional coordination, funding, and outreach to ensure successful implementation.	This could be evaluated in the Phase I implementation planning activities. However, because groundwater modeling shows that this project would provide significant benefit to the Basin only if a companion project(s) such as the Moorpark Desalter is implemented to increase available groundwater storage space. The Plan has been revised to not recommend proceeding with this project until a required companion project is implemented.
RG-29	Rob Grether	General Editorial	Schedule	24	3		Section 3 would benefit from a discussion of the more critical near-term tasks/next-steps over the next three years or so. This could be organized by quarter for 2025 and thereafter by year for years 2026 and 2027. Such an addition should specifically state the core activities that are anticipated by quarter (or year for 2026 and 2027). This would help Watermaster and the stakeholders visualize how projects fit together (and in some cases are interdependant) and to assess whether Watermaster is on track for planned project implementation. It would also accord with Section 5.3.2.4 of the Judgment, which requires that the BOP include "[a] prioritization schedule of the Basin Optimization Projects to be implemented."	Section revised.
RG-30	Rob Grether			24	2.2.4 and 3		The draft BOP acknowledges that several of the projects (arundo removal, arroyo storm flow capture and recharge, and City of Simi Valley water acquistions) may be dependent, at least partially, on other projects, notably the proposed Moorpark Desalter. Because the success of several of the proposed projects hinge on this question, the extent to which they are dependent on the desalter should be included in the description of the feasibility study for the deslater in Section 2.2.4 and should be prioritized by Watermaster to undertake and finalize as soon as possible. This analysis would presumptively rely on modeling of those projects that are potentially dependendent on the desalter. This, in turn, depends on the adequacy of the Calleguas groundwater flow model for the ELPMA to accurately model these projects and their interdependence on the desalter for their effectiveness. Thus, consistent with the preceeding comment, the schedule should acknowledge these modeling questions as critical near-term tasks and should specify when these matters can be reasonable completed.	Insufficient information was provided by VCWWD-1 to fully evaluate the Moorpark Desalter or include it in BOYS modeling. Projects 1 and 3 were re-scored as stand-alone projects and are not recommended for implementation at this time. Project 5 is not dependent upon the Moorpark Desalter project.
RG-31	Rob Grether	General Editorial	Budget	24	4		Section 4 should discuss the amount of Basin Assessments that will be necessary to fund the BOP's 5-year budget. This will help Watermaster, stakeholders, and if necessary the Court, understand the financial parameters necessary for responsible and sustainable management of the Basin and maintenance of the Basin's Opertaing Yield. Further, Section 4 should acknowledge that Appendix D calls for modest expenditures in Q2 of 2025, but that the next budget is not scheduled to be determined until Watermaster's June Board meeting at the end of Q2. Section 4 should recommend a solution for Watermaster to resolve this mimatch in timing such as reliance on unspent Watermaster funds from the current year or a loan from the FCGMA's general fund to be reimbursed once revenue is received from the Basin Assessment.	The amount of Basin Assessment will be dependent upon the WM Board's selection of the proposed Basin Optimization Projects, and timing, and development into the WM Budget. The recommendation for timing issues relative to the WM Budget is beyond the scope of the BOP.

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

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Recommendation	Comment Response
RG-32	Rob Grether	Misc	Alternate Desalter Siting Considerations	10	2.2.4		As part of the feasibility analysis, consider evaluating the costs and benefits of locating the desalter nearer to the East/West boundary of the Las Posas Basin. Doing so may: - Reduce brine disposal costs and complexities by shortening the connection to the Calleguas Salinity Management Pipeline, and - Expand distribution options through Berylwood Heights Mutual Water Company and Zone Mutual Water Company infrastructure, which serves both the East and West Basin Management Areas.	A new project for a feasibility study of a potential regional desalter has been added to the BOP.
JDM-1	Menne	Misc	Clarity on costs	N/A	N/A	*N/A*	Need clarity on all estimated costs, both capital and annual operating costs, expressed on a $ per AF basis.	More clarity has been provided on the estimated costs for the projects selected for inclusion in the BOP. However, some costs remain uncertain until the Watermaster Board adopts relevant policies and funding allocation.
JDM-2	Menne	Misc	Identify Point Person for Grants	N/A	N/A	*N/A*	Need a person with responsibility to pursue grants and other forms of funding projects	Watermaster staff continuously monitor state and federal funding agencies for potential grant opportunities.
JDM-3	Menne	Misc	Pursue Diverse Sources of Water	N/A	N/A	*N/A*	Use reasonable efforts to obtain diverse sources of water to reduce risk of current single source of water	The new Project 9, Regional Desalter Feasibility Study, will investigate potential additional sources of water.
JDM-4	Menne	Technical	Feasibility of Project 2	7	2.2.2.2	*Because this project will rely on existing infrastructure....*	Confirm capacity of Zone and VCWWD infrastructure to accept projected flows	Additional clarification has been included in text, see response to RG-11.
JDM-5	Menne	Technical	Feasibility of Project 2	7	2.2.2.3	*The cost to implement this project is driven by CMWD's water rates.*	Discuss reimbursement to Zone and VCWWD for use of their infrastructure and related costs.	Potential additional incentive parameters will be determined during policy development in the first phase of the project. Text has been revised accordingly.
JDM-6	Menne	General Technical	Feasibility of Project 3	8	2.2.3.2	*VCWWD-1 is conductiung a Feasibility Study.....*	Confirm the Study will include extimated capital costs and operating costs expressed as $ per AF	The feasibility study is being conducted and funded by VCWWD-1. Prior to considering Project 3 for implementation, all costs including O&M would need to be estimated.
JDM-7	Menne	Technical	Need for adequate monitoring wells	18	2.2.9	*This project proposes installation of multi-level monitoring wells....*	Prioritize installation of sufficient number of monitoring wells/devices to adequately monitor basins' groundwater status and enhance future management and decision-making.	The two data gap projects identified as Projects 9 and 10 in the draft have been removed from the BOP based on TAC recommendation.
AAA-01	Art Aseo	General Technical	Addition of location map	N/A	N/A	*N/A*	Please consider adding a location map to show approximate location of planned projects that are reasonable to plot, understanding that some projects might be impossible to show locations.	Good suggestion, however, the five projects selected for inclusion in the BOP do not have specific locations.
AAA-02	Art Aseo	General Technical	Revise first sentence	8	2.2.3.2, Project Phasing and Timing	*VCWWD-1 is conducting a feasibility study for this project, which they anticipate completing by March 30, 2025.*	Change sentence to: "VCWWD-1 has completed the feasibility study for this project. The design is in progress with an anticipated completion by end of 2025." Please reflect same changes on Appendix B (page 50).	Text revised.
AAA-03	Art Aseo	General Technical	Revise second sentence	8	2.2.3.2, Project Phasing and Timing	*VCWWD-1 anticipates that construction of the diversion facilities could be completed in a single phase by June 30, 2027.*	Change sentence to: "VCWWD-1 anticipates that construction of the diversion facilities could be completed in a single phase by end of 2027." Please reflect same changes on Appendix B (page 50).	Text revised.
AAA-04	Art Aseo	General Technical	Additional sentences to address future extension of CMWD's SMP from Camarillo/Somis to Moorpark (Phase 2E), and the right-of-way acquisition for the Moorpark Desalter project.	10	2.2.4, second paragraph	*Add sentences after: Additionally, this project may require construction of additional pipeline to connect the desalter's brine disposal system to CMWD's Salinity Management Pipeline, which discharges brine from various desalters and water treatment plants to the Pacific Ocean.*	Add the following: "Also, CMWD's SMP will need to be extended from Camarillo/Somis to Moorpark to provide brine disposal. There is also a requirement to acquire a right-of-way or easement for the desalter and associated pipelines."	Text has been revised regarding the need for an additional pipeline to connect to CMWD's SMP. There may be other right-of-way or easement requirements as well. Text and scoring represent that these have not been identified.

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

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Recommendation	Comment Response
AAA-05	Art Aseo	General Technical	Moorpark Desalter's dependency on other project (CMWD's SMP)	46	Appendix B	*Not dependent on other unbuilt projects.*	VCWWD-1 believes that the Desalter project will be dependent on future CMWD's SMP (Phase 2E) for the disposal of brine water. Please reflect same comment on Appendix B (page 51, Dependency on Other Projects).	Text revised.
sm1	Steven Murata	general Technical	monitoring wells	19	2.2.9	*WLPMA and Oxnard SubBasin*	Del Norte Water Co. has several highly monitored wells in this area. I'm sure other exisiting well could be also set up for monitoring.	The two data gap projects identified as Projects 9 and 10 in the draft have been removed from the BOP based on TAC recommendation.
LS-1	Laurel Servin	General Editorial	Arundo removal project	1 - Dudek	Table 1	*Arundo donax removal, and periodic maintenance, from Arroyo Simi-Las Posas corridor*	The cost to maintain the removal of the arundo is unclear - would like clarification of the annual O&M plan. Also, I have personal experience with the removal of arundo on 6 acres along the barranca on my property. We replaced the arundo with mule fat and other native species, and the aggresive arundo regrowth was unmanageable. We installed special irrigation to support the new/replacement native species and followed all instructions to the letter; still, we could not keep the arundo regrowth away. I am concerned that the initial cost plus the ongoing cost to continually cut away the regrowth will cause exorbitant costs for such a small anticipated yield. Will any weed abatement products be allowable? Second, how will this support groundwater quality as stated in Appendix B?	Arundo removal O&M costs would be clarified in the Phase I implementation plan. However, this project was not selected for inclusion in the BOP. Reference to groundwater quality has been removed for this project in Appendix B.
LS-2	Laurel Servin	General Editorial	Page numbering throughout	All	Table of Contents	*Various*	The page numbering convention throughout the document needs work. Some pages have no numbers; multiple sections start over at Page 1 - the numbering should be revisited.	This was a draft document. The table of contents and page numbers will be correct in the final document.
LS-3	Laurel Servin	General Editorial	Design and Installation of Dedicated Monitoring Wells	1 - Dudek and Appendix D-2, D-3	Table 1 and Appendix D-2 and D-3	*Construction of up to four (4) nested monitoring wells to address spatial data gaps in groundwater elevation monitoring the LPV*	Table 1 lists the construction of up to four (4) new monitoring wells: In Appendix D, pages D-2 and D-3, there are six new wells listed in six consecutive quarters. Conflicting information - needs correction.	The two data gap projects identified as Projects 9 and 10 in the draft have been removed from the BOP based on TAC recommendation.
RC-1	Cavaletto	General Technical	Project Criteria and Project Selection		Section 2		I have serious reservations about the way the 10 projects were ranked, and which were chosen to be included in the Basin Optimization Yield Study. Projects that are in the Feasibility Study and Data Gap Project Prioritization (FSDGPPG) grouping are at a distinct disadvantage to those in the Water Supply Project Prioritization (WSPPG) grouping. Using the same criteria to evaluate two distinctly different types of projects leads to the FSDGPPG projects receiving lower scores regardless of their value when compared to the WSPPG projects, i.e. there is a bias for basin replenishment projects. Placing higher value on the WSPPG projects leads to spending significantly more money early in the 5-year review cycle without the benefit of the knowledge to be gained from the FSDGPPG projects. Additionally, the knowledge from the FSDGPPG projects may lead to not needing to implement some of the WSPPG projects. Specifically, projects number 8, 9, and 10. Project 8 could show that there are enough water users in the basin that would be willing to “sell” their water either short term (5-10 years) or long term (>10 years) for a price equivalent to the value derived from the use of the water. This water would be banked in the basin and the cost to purchase the water could be spread across all users at a cost lower than going after Basin replenishment water or reduce the need for Basin replenisment water. Projects 9 and 10 can assist in verifying the groundwater conditions of the basin and improve the hydrologic models being used to verify the impact of various proposed activities in the basin.	We agree that the Project Ranking Sheet best applies to implementation projects. The evaluations and scoring have been revised based on PAC and TAC recommendations. Projects that are dependent on other projects have been evaluated as standalone projects. The feasibility studies have been evaluated based on implementation, to the extent that information is known. The two data gap projects identified as Projects 9 and 10 have been removed from the BOP based on TAC recommendation. These will be addressed in a separate document. Further, the revised document includes selection of projects for implementation in the BOP.
RC-2	Cavaletto	Technical	Point allocation	18	2.2.8.2	*FCGMA anticipates that the Program developed through this project would have a lifespan that exceeds 25 years. However, this Program should be re-evaluated at a 5-year frequency to ensure that water costs and priority areas are appropriately reflected in the Program.*	Just because there is a 5-year re-evaluation period doesn't mean it has a <5 year life. The points allocated should be "5", not "1".	Project scoring revised.
RC-3	Cavaletto	Editorial	Missing Text	18	2.2.8.4		There is no text listed for this criteria	Text has been completed in this section.

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

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RC-4	Cavaletto	Technical	Point allocation	16	2.2.7.2	*Anticipated Project Lifespan: Not applicable*	The point allocation is "1" for this criterion when the text says it “isn't applicable”. This is an example of when a criterion isn't applicable, and the project is then penalized with low points because it doesn't fit.	The project has been rescored.
RC-5	Cavaletto	General Editorial	Project Implementation Schedule and 5-Year Project Implementation Budget	24	3 and 4		Why is it assumed that all 10 projects need to be completed in 5 years? While grants can reduce the cost of projects to water users, what is the limit to the amount of project costs that could be passed onto the water users each year? This should inform the schedule.	The schedule and budget in Appendices C & D have been revised to include only the five projects selected for implementation and inclusion in the BOP.

TO: **Las Posas Valley Watermaster**

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

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

DATE: **February 6, 2025**

Dear Las Posas Valley Watermaster,

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

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

Policy Rationale for Recommendation:
See memo below for rationale.

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

Tally of Committee Member Votes:

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

Report of Bases for Majority and Minority Committee Member Positions:

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

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

Following a thorough review by the PAC, the member recommendations were compiled into the Master List appended to this Recommendations Report (the Excel file will be made available to Watermaster staff for ease of response comment). Individual recommendations are keyed to the dBOP sections for ease of cross reference and provide more detailed insight into PAC member's suggestions for improving the dBOP.

While the Excel spreadsheet contains all PAC recommendations, the PAC's key policy recommendations are summarized in the six recommendations below.

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

Projects selected for inclusion in the BOYS, as recognized by the BOP in Section 1.1 and 2.1, and prioritized for development and implementation, should meet the criteria established by Section 5.3.2.2 of the Judgment, that they be "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." With this in mind, the PAC approached review of the proposed projects and programs against three criteria: cost; time to water supply production; and operational flexibility. Projects that meet these criteria, especially ones that are able to be implemented in short order, could provide immediate positive impacts. Such "quick wins" could demonstrate our collective capacity to develop solutions and encourage the necessary confidence in the process to persist through to basin sustainability.

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

Projects that are costly, have long lead times, and result in significant built infrastructure that eats up scarce available capital, incur the operational cost of rampdown over the design and construction period, and create institutional inertia. Projects with implementation timelines and benefit realization horizons that extend beyond 2040 do not help achieve the goals of the GSP or the Judgment.

Projects that are only fully optimized with the development of other projects can create perverse incentives, hardening commitment to decisions even after more cost-effective alternatives are identified.

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

The PAC has reviewed the information for the three prioritized projects (Projects 1, 2, and 5) for inclusion in the BOYS and has reservations that those projects "...are sufficiently defined to implement without additional feasibility studies to define project scopes, costs, and benefits" as described in the dBOP. The dBOP acknowledges the PAC's observations that the costs for these projects have not been adequately researched (e.g., water purchase costs from City of Simi Valley are not known, costs for purchasing water from CMWD are unrealistically assumed to be constant through 2029) and the magnitude of the benefits may be dependent on the implementation of other projects that will not be prioritized in the BOYS. **The PAC recommends that the classification of Projects 1, 2, and 5 as "...sufficiently defined to implement..." be revisited and that these projects undergo further scope and cost development prior to consideration for implementation.**

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

Cost information was lacking for many projects, which makes it difficult to evaluate the cost/benefit relationship and to perform comparisons between the various projects. The lack of cost information, even at the placeholder level, skews the cost factor used in the project ranking. **The PAC recommends that all various costs, including operation and maintenance and ancillary construction costs (even as a range of costs, if necessary), be included in the dBOP to help stakeholders understand the potential range of project costs.** It is recognized that the anticipated costs included in the dBOP would be placeholders and would be updated as the project scope matures and modeling or feasibility results become available.

In addition, the dBOP should include a section on potential funding mechanisms/sources for each project. As currently written, stakeholders cannot discern what entity(-ies) would be fiscally responsible for implementation, operations, and maintenance of all the projects/programs described.

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

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

Recommendation 5: Data mine existing water level data sets.

The PAC noted that the intentions of projects 9 (*Construction of additional dedicated groundwater monitoring wells*) and 10 (*Installation of transducers in groundwater monitoring wells*) are critical and

vital to long term success. High-quality data that is spatially distributed both geographically and in multiple aquifers is key to understanding how the basin responds to management actions.

The PAC understands the need to expand the monitoring network, but wonders, given the abundance of wells in the Las Posas Basin, there may be other options besides constructing new monitoring wells, such as exploring the extent to which existing wells can be modified for inclusion in the monitoring network. **The PAC recommends that new monitoring wells should be considered to fill important data gap areas that need additional information, but only after an exhaustive review of the existing wells in the basins is performed to determine if those wells are suitable additions to the monitoring network.**

The PAC recognizes that the use of irrigation or municipal wells that may be screened across multiple aquifers is less desirable than aquifer-specific monitoring wells. However, irrigation and municipal wells are important additions to monitoring programs in many groundwater basins. The PAC is aware of well owners in the LPV who record and maintain water level data for their wells and is willing to assist the Watermaster in identifying those well owners.

The PAC recommends that the TAC, in consultation with Watermaster staff and Dudek, identify locations (geographical and hydrogeological) where additional monitoring would be beneficial, provide those locations to the PAC, and allow the PAC to identify existing wells that may be viable candidates for modification and inclusion in the network.

Recommendation 6: Project benefit interdependencies should be clearly analyzed.

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

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

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Recommendation
CN-1 (commentor initials and comment number)	Commentor Name	General Technical, General Editorial, Technical, Editorial, etc.	Simple description of comment topic	Page number as it appears in document	Section number with as much detaill as possible, including paragraph and line whenever practicle	*Text from document in italics for identification*	Comment with as much detail as possible/necessary.
CMWD-1	Ian Prichard, Calleguas	Policy	Overarching				The biggest problems the basin faces are the two pumping depressions, one in the northern ELPMA and one in the eastern WLPMA. Watermaster and its stakeholders should be laser-focused on solving these two problems. However, the current draft of the Basin Optimization Plan is not a solution-oriented document that is recognizable as a "plan." It is instead a list of projects, some of which, even if built or implemented, would not address the pumping depressions. None of these projects is cheap; building ones that don't solve the problem isn't just expensive, but wasteful and counterproductive. The BOP should describe and rank the problems we are trying to solve, match projects to the problems they solve, and promote those that solve the biggest problems.
CMWD-2	Ian Prichard, Calleguas	Editorial	define WWDs	4	2.1.4	*"Additionally, this category is used identify whether the collaboration, cooperation, or participation of the FCGMA, Calleguas Municipal Water District (CMWD), WWDs , United Water..."*	Define "WWDs". I assume it's Waterworks District, but it's not used elsewhere
CMWD-3	Ian Prichard, Calleguas	Policy	planning assumptions	4	2.2.1	*"Arundo donax (Arundo) would be replaced with native riparian plant species, which are estimated to consume approximately 6 to 25 AFY per acre less water than Arundo (VCWSD 2015)."*	This is a massive range. Is there anything more specific for which native plants would replace the arundo, provided it can be removed and kept in abeyance? What's the mix of native plants and the resulting ET savings from that mix that gets us to 8.27 AF/acre savings? I see the reference below to the Wildscape feasibility study—from 2015. Is there anything new in the last decade that *demonstrates* water savings? Something based on an implemented and longstanding removal project rather than a feasibility study?
CMWD-4	Ian Prichard, Calleguas	Policy	planning assumptions	5	2.2.1.1	*"Implementation of this project could increase recharge to the ELPMA by as much as 2,680 AFY (VCWSD 2015). This is based on the estimated reduction in evapotranspiration demands associated with the project, or portion of which would occur upstream of the LPVB (VCWSD 2015). Additional modeling is required to characterize the volume of water that would recharge the ELPMA.*	If 2,680 is estimated high end of ET savings in Arroyo Simi, how do we know that much will be available for recharge? It would be more accurate to say "as much as 2,680 AFY may be available in Arroyo Simi for downstream recharge." Per the last sentence in this paragraph, more modeling is necessary to have a sense of how much may actually end up in the aquifer.
CMWD-5	Ian Prichard, Calleguas	Policy	planning assumptions	5	2.2.1.2	*"This project relies on existing technology and similar projects have been implemented across the Ventura Watershed by various local interests (e.g., Ventura County Public Works Agency, various developers, Rancho Simi Recreation and Parks District, and others)."*	Recommend using results from similar projects that have been implemented across the Ventura Watershed to inform math on water savings/increased contributions to the creek, rather than a 2015 feasibility study.
CMWD-6	Ian Prichard, Calleguas	Policy	planning assumptions	5	2.2.1.2	*"While this project is not dependent on other unbuilt projects, the full benefits of this project may require implementation of other projects, like the Moorpark Desalter (Project No. 4), that lower groundwater elevations in the Shallow Alluvial Aquifer to increase available storage in the ELPMA and limit discharge of the increased arroyo flows downstream into the Pleasant Valley Basin."*	Knowing how much of the water saved from this Arundo removal project could end up in the LPV basin under various scenarios is the go/no-go question for this project. The sentence as written underplays the importance of that analysis.
CMWD-7	Ian Prichard, Calleguas	Policy	cost assumptions	6	2.2.1.3	*"Assuming a 25-year project lifespan and that the project will increase recharge to the ELPMA by 2,680 AFY, the total cost to implement this project is estimated to be approximately $390 per AF."*	Recommend holding off on cost estimates until the modeling is done. Also, costs are based on a 2015 feasibility study and a wide range (6-25 AFY/acre) of savings. If we can find demonstrated savings in a comparable area, we will have higher confidence in the assumptions underlying the cost estimate.
CMWD-8	Ian Prichard, Calleguas	Editorial	planning assumptions	7	2.2.2.1	*Water Supply*	The amount of imported water necessary to prevent minimum threshold exceedances in the WLPMA should be provided so the potential yield of this project is clear and definitive.
CMWD-9	Ian Prichard, Calleguas	Policy	planning assumptions	7	2.2.2.1	*"In 2019, it was estimated that 1,762 AFY of CMWD water would be available for purchase and delivery to Zone MWC and VCWWD-19."*	Where did this number come from?
CMWD-10	Ian Prichard, Calleguas	Editorial	planning assumptions	7	2.2.2.1	*"CMWD represented in recent consultation that the limiting factor is the volume of imported water the two purveyors can accept to offset their pumping in the WLPMA."*	There are other limiting factors to the supply: drought and an imported water outage. Calleguas's and Metropolitan's Water Shortage Contingency Plans (in their Urban Water Management Plans) describe the six water shortage stages and their potential impacts on water users. As recently as 2022, when the State Water Project allocation was only 5% for the second year in a row, Metropolitan enacted an Emergency Water Conservation Program that required significant demand curtailment. During such periods, in-lieu water may not be available. Other emergencies that interrupt imported water service would also constrain the availability of in-lieu water.
CMWD-11	Ian Prichard, Calleguas	Editorial/Policy	planning assumptions	7	2.2.2.2	*"This project would reinitiate a Metropolitan Water District of Southern California incentivized program implemented by CMWD that was operational in the WLPMA between 1995 and 2008."*	This references a program that no longer exists and cannot be reinstated.
CMWD-12	Ian Prichard, Calleguas	Editorial	Complexity analysis/comparison	7	All Projects	*"Project Complexity"*	Recommend some standardization of complexity discussion. Three projects don't offer a judgment on complexity; four are described as "moderately complex"; one is considered "low"; and two are described as "not technically complex."

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

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Recommendation
CMWD-13	Ian Prichard, Calleguas	Policy	planning assumptions	7	2.2.2.2	*"During development of the GSP, CMWD indicated that this project lifespan could exceed 50 years."*	The "could" in this sentence begs additional exposition. Recommend modifying this text to reflect that the reliability of getting imported water from CMWD is currently equal to the reliability of the State Water Project and Metropolitan Water District. Based on existing infrastructure, it is likely that "imported" water will continue to mean SWP water from MWD, and it is likely that it will be available for more than 50 years.
CMWD-14	Ian Prichard, Calleguas	Policy	project complexity	7	2.2.2.2	*"the full benefits of this project may require implementation of other projects, like the Moorpark Desalter (Project No. 4)"*	Relying on a groundwater extraction project (Moorpark desalter) to ensure optimum benefit significantly increases the institutional and implementation complexity of this project.
CMWD-15	Ian Prichard, Calleguas	Editorial		7	2.2.2.3	*"This cost includes O&M to maintain CMWD's conveyance infrastructure."*	Whis is only this portion of the rate called out?
CMWD-16	Ian Prichard, Calleguas	Editorial	costs	7	2.2.2.3	*"The project is envisioned to incentivize VCWWD-19 and Zone MWC by funding the difference between the cost of CMWD and the cost of pumping."*	Clarify that the incentive would come from WM via funds raised as part of basin assessment. It will not be provided by CMWD.
CMWD-17	Ian Prichard, Calleguas	Policy	cost assumptions	7	2.2.2.3		The paucity of dollar signs in this paragraph is striking, especially compared with 2.2.1.3, a project that is more conceptual and conditional. Finding out how much it costs VCWWD-19 and Zone to pump is straightforward—and critical to determining whether/how much to buy.
CMWD-18	Ian Prichard, Calleguas	Policy	cost assumptions	7	2.2.2.3	*""The project is envisioned to incentivize VCWWD-19 and Zone MWC by funding the difference between the cost of CMWD and the cost of pumping."*	It needs to be clear that Calleguas's water would be purchased at the full Tier 1 rate and any financial incentive would be provided by the Watermaster using funds from the basin assessment.
CMWD-19	Ian Prichard, Calleguas	Policy	cost assumptions	9	2.2.3.3	*"VCWWD-1 estimates that the capital cost to construct this project is approximately $4,000,000. O&M costs have not been estimated."*	2.2.3.2 states that the GMA recommends modeling to estimate amount of recharge that would stay in the ELPMA. What is the cost estimate for this modeling and can we include it here?
CMWD-20	Ian Prichard, Calleguas	Editorial/Policy	project benefits	10	2.2.4	*"...reduce the dependence on imported water in the LPVB by providing new local potable supplies."*	There needs to be some way to recognize that different constituents may have different goals. There is a tension between this project, or at least this goal for this project, and projects that bring additional imported water supplies into the basin.
CMWD-21	Ian Prichard, Calleguas	Policy	cost assumptions	10	2.2.4	*"Additionally, this project may require construction of additional pipeline to connect the desalter's brine disposal system to CMWD's Salinity Management Pipeline, which discharges brine from various desalters and water treatment plants to the Pacific Ocean."*	The project would definitely require construction of additional pipeline to connect the desalter's brine disposal system to the Salinity Management Pipeline (SMP), which currently terminates near Los Angeles Ave. and La Cumbre Rd. An SMP Discharge Station would also be required, which would contain metering and water quality sampling equipment.
CMWD-22	Ian Prichard, Calleguas	Editorial/Policy	project benefits	10	2.2.4.1	*"...pumping 6,270 AFY for the desalter project would result in an additional 2,200 AFY of recharge to the ELPMA. Based on this, it is estimated that this project would increase the sustainable yield of the ELPMA by 2,200 AFY."*	Please explain how 6,270 AFY of pumping to make room for 2,220 AFY of recharge increases the sustainable yield.
CMWD-23	Ian Prichard, Calleguas	Editorial	project status	10	2.2.4.2	*"VCWWD-1 has not completed a feasibility study for this project."*	2.2.4.1 references "preliminary numerical groundwater flow modeling." 2.2.4 intro states "Preliminary analyses for the proposed desalter have been completed and the project is in the planning phase."
CMWD-24	Ian Prichard, Calleguas	Policy	planning assumptions	10	2.2.4.2	*"This project is not dependent on other unbuilt projects or projects that are currently under construction."*	As stated above, the SMP does not extend to the Moorpark Desalter location and several miles of additional pipeline would need to be constructed to serve the Moorpark Desalter. The last sentence of this paragraph states "VCWWD-1 may need to develop an agreement with CMWD to dispose of brine produced at the desalter via CMWD's Salinity Management Pipeline." There are other options besides the SMP for disposing of brine (though how they compare to the SMP is unclear), but if VCWWD-1 wants to use the SMP to dispose of its brine, it would definitely require an agreement with Calleguas to do so.
CMWD-25	Ian Prichard, Calleguas	Policy	project benefits	11	2.2.4.4	*"reduce the dependence on imported water in the LPVBLPV by providing new local potable supplies "*	see comment IP-13 re: 2.2.4
CMWD-26	Ian Prichard, Calleguas	Editorial		11	2.2.4.4	*"Depending on the operational conditions and distribution of desalted water, this project ."*	sentence incomplete
CMWD-27	Ian Prichard, Calleguas	Policy	project benefits	12	2.2.5	*"...leaving 2,200 to 3,700 AFY available as surface flow and recharge to the ELPMA."*	Is "surface flow" the same as "recharge"?
CMWD-28	Ian Prichard, Calleguas	Policy	project benefits	12	2.2.5.1	*"…implementation of this project could increase the sustainable yield of the ELPMA by as much as 2,000 AFY."*	The water is flowing today. How does developing an agreement with Simi to ensure it continues to flow *increase* sustainable yield—at all, let alone by 2,000 AFY?
CMWD-29	Ian Prichard, Calleguas	Policy	project benefits	12	2.2.5.2	*" the full benefits of this project may require implementation of other projects, like the Moorpark Desalter (Project No. 4), which lowers groundwater elevations in the Shallow Alluvial Aquifer"*	The water is not "additional" unless and until it has a place to go that it doesn't now.
CMWD-30	Ian Prichard, Calleguas	Policy	cost assumptions	13	2.2.5.3	*"...FCGMA anticipates that this water will cost less than the $500/AF evaluation criterion…"*	What is the basis for this assumption? What cost are we assuming for the budgeting? Recycled water goes for much higher than this in other parts of the state--in fact, just a few miles down the 101. Offers have been made to the City of Simi Valley to tie up this water, and yet it has not been tied up. Calleguas currently has an agreement with the City to buy recycled water for more than $1,100/AF.
CMWD-31	Ian Prichard, Calleguas	Policy	project benefits	13	2.2.5.4	*"... this project would maintain native habitat…"*	What is the definition of "native habitat"? The second sentence of this paragraph states that "perennial flow… did not begin until the 1970s." Also, without Arundo removal, the water will also maintain invasive species.
CMWD-32	Ian Prichard, Calleguas	Editorial		14	2.2.6.2	*"FCGMA anticipates that implementation of Phase I could be completed within a 2-year timeframe following commitment of funds for the feasibility study."*	Whose commitment?
CMWD-33	Ian Prichard, Calleguas	Editorial/Policy	cost assumptions	15	2.2.6.2	*"may be required to construct, operate, and maintain desalter facilities "*	Who would pay for these?

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

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Recommendation
CMWD-34	Ian Prichard, Calleguas	Editorial/Policy	planning assumptions	15	2.2.6.3	*"Additionally, this does not include any costs required to construct, operate, and maintain local desalters to treat the recycled water to levels suitable for irrigation…"*	Whose responsibility is it to maintain what level of service?
CMWD-35	Ian Prichard, Calleguas	Editorial/Policy	planning assumptions	15	2.2.6.3	*"... and to avoid significant and unreasonable degradation of water quality."*	Whose responsibility is this? And of what "water"? This seems like a different goal than irrigation water quality depending on what water we're talking about.
CMWD-36	Ian Prichard, Calleguas	Policy	planning assumptions	15	2.2.7	*feasibility study*	It is unclear why a feasibility study is needed. In lieu deliveries have been made to Ventura County Waterworks District No. 1 in the past and the infrastructure remains in place.
CMWD-37	Ian Prichard, Calleguas	Policy	planning assumptions	16	2.2.7.1	*Water Supply*	Consideration could also be given to directly injecting imported water into Calleguas's Las Posas Aquifer Storage and Recovery Wellfield.
CMWD-38	Ian Prichard, Calleguas	Policy	planning assumptions	16	2.2.7.1	*Water Supply*	The amount of imported water necessary to prevent minimum threshold exceedances in the ELPMA should be provided so the potential yield of this project is clear and definitive.
CMWD-39	Ian Prichard, Calleguas	Editorial		17	2.2.7.4	*Benefits…*	there doesn't appear to be text in this section
CMWD-40	Ian Prichard, Calleguas	Policy	project benefits	17	2.2.7.5	*"… the potential increase to the sustainable yield of the ELPMA."*	How would it increase sustainable yield? It would offset pumping or shift pumping or add to total water use in the basin, but it doesn't increase "yield."
CMWD-41	Ian Prichard, Calleguas	Editorial		18	2.2.8.4	*Benefits…*	there doesn't appear to be text in this section
CMWD-42	Ian Prichard, Calleguas	Editorial	CEQA	19	2.2.9.2	*"CEQA and NEPA are not required to implement this project."*	CEQA does apply, even if only to file an NOE
CMWD-43	Ian Prichard, Calleguas	Editorial	grants	20	2.2.9.3	*"however, Watermaster staff continuously monitor for potential grant funding"*	This should be a blanket statement made at the top of the document or in every Cost and Funding subsection
CMWD-44	Ian Prichard, Calleguas	Policy	collaboration	20	2.2.9.4	*Collaboration Requirements*	Calleguas already operates a monitoring network comprised of nested, clustered, and individual monitoring wells, as well as monitors wells owned by others. Any monitoring efforts should be closely coordinated with Calleguas to prevent unnecessary duplication.
CMWD-45	Ian Prichard, Calleguas	Policy	collaboration	20	2.2.10	*groundwater monitoring*	Like Project 9, this needs to be done in strong coordination with CMWD.
CMWD-46	Ian Prichard, Calleguas	Editorial	planning assumptions	22	2.3.1	*"Three projects are sufficiently defined to implement without additional feasibility studies to define project scopes, costs, and benefits."*	See notes to Project No. 2, which would require additional analysis to identify current demands, which will impact costs and benefits. Likely won't rise to the level of a feasibility study, but will require some refinement.
RG-01	Rob Grether	Editorial	Watermaster or FCGMA	1	1.1	*As outlined in the Judgment, FCGMA, in consultation with the LPV Policy Advisory Committee (PAC) and Technical Advisory Committee (TAC), is responsible for developing a Basin Optimization Plan for the LPV.*	5.3.1 states "Watermaster shall…develop and maintain a Basin Optimzation Plan." While FCGMA is currently serving as Watermaster, this sentence and others like it should be changed to match the Judgment.
RG-02	Rob Grether	Editorial	Text from 5.3.2.1	1	1.1	*Criteria for determining the priority and feasibility of each Basin Optimization Project;"*	5.3.2.1 specified the criteria that are to be used for determining the prority and feasibility of each project. As written, it suggests the FCGMA will be setting the criteria instead. The criteria specified in the Judgment should be repeated here so a reader doesn't have reference the Judgment to know if projects in the BOP conform: "Citeria for determining the priority and feasibility of each Basin Optimization Project...shall include, but not be limited to, the estimated amount of yield augmentation, cost effectiveness, cost feasibility, technical/engineering feasibility, project implementation timing, benefits relative to the achievement of Sustainable Groundwater Management, and whether the collaboration, cooperation, or participation of the FCGMA, Calleguas, WWDs, United Water Conservation District, or the Water Right Holders is necessary or desirable for implementation of the Basin Optimization Project.
RG-03	Rob Grether	Editorial	Specific text from 5.3.2.2	1	1.1	*A description of Basin Optimization Projects;*	should be modified to include full text from 5.3.2.2: "A description of Basin Optimization Projects that are likely to be practical, reasonable, and cost-effective to implement prior to 2040 to maintain the Operating Yield at 40,000 AFY or as close thereto as achievable."
RG-04	Rob Grether	Editorial	Specific text from 5.3.2.5	1	1.1	*A schedule for the Basin Optimization Projects which are to be evaluated, scoped, designed, financed, or developed; and*	include full text emphasizing need to coordinate timelines with other agencies: "5.3.2.5. A schedule for the Basin Optimization Projects which are to be implemented to be evaluated, scoped, designed, financed, and developed. If the collaboration, cooperation, or participation of the FCGMA, Calleguas, WWDs, United Water Conservation District, or the Water Right Holders is necessary or desirable for any evaluation, scoping, design, financing, and development of any Basin Optimization Project, the schedule shall so consider the time necessary for such collaboration or cooperation; and
RG-05	Rob Grether	General Editorial	Criteria from 5.3.2.1	6 and others	2.2	*Benefits relative to Sustainable Groundwater Management*	This criterion is specified in 5.3.2.1 but missing from projects 1 - 6, 9, 10
RG-06	Rob Grether	Technical	Arundo removal math	4	2.2.1 and 2.2.1.1 and 2.2.1.4	*The Arroyo Simi–Las Posas Arundo Removal Project involves removal of the invasive plant species Arundo donax from approximately 324 acres of land along the Arroyo Simi-Las Posas corridor. Arundo donax (Arundo) would be replaced with native riparian plant species, which are estimated to consume approximately 6 to 25 AFY per acre less water than Arundo (VCWSD 2015). If all of the Arundo within the 324-acre area is removed, this project could result in up to an additional 2,680 AFY of recharge to the ELPMA (VCWSD 2015).*	The math doesn't track. If arundo removal can result in between 6 and 25 AFY per acre less water, that would mean a range of 1,404 to 5,850 AFY, yet in 2.2.2.1 it says project could result in "as much as 2,680 AFY." If additional assumptions are being made that further reduce the potential water savings, they should be identified and the math should be clearly described. And then in 2.2.1.4 it says Arundo uses 1,900 AFY more than native riparian species. Would the plan be to plant native riparian species in place of the Arundo? If so, what is the cost. If not, why mention this?

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

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Recommendation
RG-07	Rob Grether	Technical	Arundo removal math	4	2.2.1	*FCGMA estimates the total cost to implement this project is approximately $390 per AF*	The estimated cost only holds if the yield is 2,680 AF. It should be clearer that it could be much higher per AF if actual infiltration does not hit the target.
RG-08	Rob Grether	General Technical	Permitted cost and time delays	4, 9	2.2.1 & 2.2.3.2		Some projects (e.g., Arundo removal, stormwater diversion, fish ladder construction) can trigger lengthy permit reviews by multiple agencies. The Plan should underscore how that could affect both scheduling and total cost.
RG-09	Rob Grether		Number formatting	6	2.2.1.3	*$9,100,00 and an O&M cost of $250 per acre-foot (AF) of water.*	I think there is a missing 0
RG-10	Rob Grether	General Editorial	CMWD cost clarity	6	2.2.2	*During development of the GSP ... 1,762 AFY of CMWD water would be available ... The project is envisioned to incentivize VCWWD-19 and Zone MWC by funding the difference between the cost of CMWD and the cost of pumping.*	The estimated cost of pumping should disclosed so that stakeholders are clear what the net cost per AF would likely be if this project were pursued. Stakeholdres may not have an appetite for water at this cost and would opt instead to face rampdown to lower allocations.
RG-11	Rob Grether	Editorial	CMWD importation limitations	7	2.2.2.1	*CMWD represented in recent consultation that the limiting factor is the volume of imported water the two purveyors can accept to offset their pumping in the WLPMA. FCGMA used these projections for analysis of the project for this Plan.*	More information on the limitations should be provided. Can the limitation be mitigated through investment in infrastructure? What would the cost be?
RG-12	Rob Grether	Misc	Storm water recharge	8	2.2.3	*Arroyo Las Posas storm water capture and recharge*	Similar to this project, I propose establishing a voluntary program to incentivize landowners in both the East and West Las Posas Management Areas (ELPMA and WLPMA) to capture stormwater runoff on their properties, particularly from local barrancas and canyons. Under this program, participating landowners would construct or expand small retention ponds or infiltration basins and receive financial compensation for each acre-foot of stormwater successfully recharged to the basin. This distributed approach can supplement larger-scale recharge initiatives, reduce peak flows downstream, and help sustain groundwater elevations above SGMA thresholds. In addition to augmenting groundwater supplies, the program could yield co-benefits such as reduced soil erosion, enhanced flood protection on private lands, and improved habitat for local wildlife. To ensure transparency and effectiveness, a straightforward protocol would be developed for measuring and verifying infiltration volumes (e.g., through metering or water-level data). Funding could come from Basin Assessment fees, grants, or local agency contributions, enabling partial or full reimbursement of capital costs to install or upgrade ponds. This model fosters local stakeholder engagement and shares the responsibility for achieving sustainable groundwater management—making it a cost-effective, community-based solution that builds resilience across the entire Las Posas Valley Basin.
RG-13	Rob Grether	General Editorial		8	2.2.3	*could provide up to 2,000 AFY of diversions ... No groundwater modeling has been conducted to characterize the storage capacity ... or the volume of recharged water that would remain in the ELPMA.*	O&M is not yet estimated, but could be substantial (e.g. for sediment removal, fish ladder maintenance, pumping, etc.)
RG-14	Rob Grether	Technical		10	2.2.4	*6,270 AFY for the desalter project would result in an additional 2,200 AFY of recharge*	6,270 AFY pumping to net 2,200 AFY yield gain is a low ratio implying a big fraction of the pumped water may be brine or lost to discharge? That may be the case, but consider clarifying the mechanics and math.
RG-15	Rob Grether	Editorial		11	2.2.4.4	*Depending on the operational conditions and distribution of desalted water, this project.*	Sentence is truncated and missing the point.
RG-16	Rob Grether	General Technical	Limited Alternative Markets and Pricing Considerations	11	2.2.5	*The City has indicated that 3,000 AFY of recycled water from the SVWQCP would be available and 1,700 AFY would be available from the dewatering wells (FCGMA 2019). However, due to the riparian use of the water along the Arroyo Simi–Las Posas...*	While Simi Valley might theoretically sell its dewatering well flows, the 3,000 AFY of recycled water faces significant regulatory constraints and lacks other practical buyers. The City is already required—and pressured by environmental stakeholders such as The Nature Conservancy—to continue discharging a baseline flow into Arroyo Simi–Las Posas. This raises doubts about whether a true “market rate” exists for this water and whether paying for it in a purchase agreement might inflate its perceived value. The Watermaster and stakeholders should thus carefully evaluate the actual economic worth of this water before finalizing any deal.
RG-17	Rob Grether	General Editorial	SVWQCP	11 & 13	2.2.5 & 2.2.6		Multiple projects rely on the same water source (e.g., SVWQCP discharge). If one project (e.g., pipeline deliveries) partially or wholly uses that water, the volumetric benefit for the other project (e.g., discharge acquisition in the arroyo) might drop. The Plan references this but could highlight the trade-off more prominently.
RG-18	Rob Grether	Technical	Simi pipeline cost clarity	15	2.2.6.3	*In 2017, the City indicated that approximately 3,000 AFY of recycled water would be available ... Implementation in two phases ... capital cost (Phase II) of $22.1 million ... ~ $700/AF over 25 years ... does not include cost to purchase or lease the water from the City or potential desalting costs.*	The $700/AF omits water purchase cost and potential on-farm or point of delivery desalting. This might push the cost well above other projects, perhaps even imported water through CMWD. The Plan should be very clear what the all-in cost could be with clear articulation of the discrete assumptions.
RG-19	Rob Grether	Editorial		17	2.2.7.4	*Benefits relative to Sustainable Groundwater Management*	Section is blank and needs to be completed - this is one of the criteria specified in 5.3.2.1
RG-20	Rob Grether	Editorial		18	2.2.8.4	*Benefits relative to Sustainable Groundwater Management*	Section is blank and needs to be completed - this is one of the criteria specified in 5.3.2.1
RG-21	Rob Grether	General Technical	Data are critical	18	2.2.9	*Cost is approximately $50,000 for Phase I ... $550,000 per well*	This project improves data quality, which has intangible but critical benefits for SGMA compliance. It should be more clearly emphasized that the cost, while high, is a fraction of the cost of mismanagement if data are lacking.
RG-22	Rob Grether	Editorial	Incusion in the BOY	22 & 23	2.3	*Recommendation for inclusion in the BOY*	It should be clear if a project is not "Recommended for Incusion in the BOY" if it is “not recommended for immediate implementation” vs. “not recommended at all”

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

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

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

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Recommendation
RG-27	Rob Grether	General Editorial	Least Cost Acquisition Program		2.2.8.3	*Cost and Funding*	In addition to recognizing that the study could cost $100,000, expected but undefined cost components of a program like this should be included, too. For example: **Program Budget** - A dedicated fund (e.g., from basin assessments or grants) would be needed for purchasing allocations. **Administrative Costs** - The program requires ongoing administration to process transactions, verify compliance, and track water use. Unlike a single construction project, costs here are mostly operational and policy-driven over the long term. **Potential Grants or Offsets** - State or federal sources might help subsidize fallowing or land-use transitions that protect groundwater. **Economic Considerations - Land Fallowing and Local Economy** - If allocation sales result in idled land, regional employment and material purchases (e.g., fertilizer, seed, equipment) may decline. These impacts should be studied or mitigated through compensation programs or assistance in crop transitions.
RG-28	Rob Grether	General Editorial	Broader Opportunity for Arundo Removal	4	2.2.1	*The Arroyo Simi–Las Posas Arundo Removal Project involves removal of the invasive plant species Arundo donax from approximately 324 acres of land along the Arroyo Simi-Las Posas corridor. Arundo donax (Arundo) would be replaced with native riparian plant species, which are estimated to consume approximately 6 to 25 AFY per acre less water than Arundo (VCWSD 2015).*	Although this project currently focuses on the Arroyo Simi–Las Posas corridor, Arundo donax also grows in numerous barrancas across private lands throughout the Las Posas Basin. Restricting removal efforts to a single waterway may limit potential water savings. If feasible, the project could be expanded to incentivize private landowners to remove Arundo on their properties and replace it with less water-intensive native riparian species in areas where the reduced evapotranspiration could increase Basin recharge. This broader, basin-wide approach would likely increase total recharge benefits, although it would also necessitate additional coordination, funding, and outreach to ensure successful implementation.
RG-29	Rob Grether	General Editorial	Schedule	24	3		Section 3 would benefit from a discussion of the more critical near-term tasks/next-steps over the next three years or so. This could be organized by quarter for 2025 and thereafter by year for years 2026 and 2027. Such an addition should specifically state the core activities that are anticipated by quarter (or year for 2026 and 2027). This would help Watermaster and the stakeholders visualize how projects fit together (and in some cases are interdependant) and to assess whether Watermaster is on track for planned project implementation. It would also accord with Section 5.3.2.4 of the Judgment, which requires that the BOP include "[a] prioritization schedule of the Basin Optimization Projects to be implemented."
RG-30	Rob Grether			24	2.2.4 and 3		The draft BOP acknowledges that several of the projects (arundo removal, arroyo storm flow capture and recharge, and City of Simi Valley water acquistions) may be dependent, at least partially, on other projects, notably the proposed Moorpark Desalter. Because the success of several of the proposed projects hinge on this question, the extent to which they are dependent on the desalter should be included in the description of the feasibility study for the deslater in Section 2.2.4 and should be prioritized by Watermaster to undertake and finalize as soon as possible. This analysis would presumptively rely on modeling of those projects that are potentially dependendent on the desalter. This, in turn, depends on the adequacy of the Calleguas groundwater flow model for the ELPMA to accurately model these projects and their interdependence on the desalter for their effectiveness. Thus, consistent with the preceeding comment, the schedule should acknowledge these modeling questions as critical near-term tasks and should specify when these matters can be reasonable completed.
RG-31	Rob Grether	General Editorial	Budget	24	4		Section 4 should discuss the amount of Basin Assessments that will be necessary to fund the BOP's 5-year budget. This will help Watermaster, stakeholders, and if necessary the Court, understand the financial parameters necessary for responsible and sustainable management of the Basin and maintenance of the Basin's Opertaing Yield. Further, Section 4 should acknowledge that Appendix D calls for modest expenditures in Q2 of 2025, but that the next budget is not scheduled to be determined until Watermaster's June Board meeting at the end of Q2. Section 4 should recommend a solution for Watermaster to resolve this mimatch in timing such as reliance on unspent Watermaster funds from the current year or a loan from the FCGMA's general fund to be reimbursed once revenue is received from the Basin Assessment.

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

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Recommendation
RG-32	Rob Grether	Misc	Alternate Desalter Siting Considerations	10	2.2.4		As part of the feasibility analysis, consider evaluating the costs and benefits of locating the desalter nearer to the East/West boundary of the Las Posas Basin. Doing so may: - Reduce brine disposal costs and complexities by shortening the connection to the Calleguas Salinity Management Pipeline, and - Expand distribution options through Berylwood Heights Mutual Water Company and Zone Mutual Water Company infrastructure, which serves both the East and West Basin Management Areas.
JDM-1	Menne	Misc	Clarity on costs	N/A	N/A	*N/A*	Need clarity on all estimated costs, both capital and annual operating costs, expressed on a $ per AF basis.
JDM-2	Menne	Misc	Identify Point Person for Grants	N/A	N/A	*N/A*	Need a person with responsibility to pursue grants and other forms of funding projects
JDM-3	Menne	Misc	Pursue Diverse Sources of Water	N/A	N/A	*N/A*	Use reasonable efforts to obtain diverse sources of water to reduce risk of current single source of water
JDM-4	Menne	Technical	Feasibility of Project 2	7	2.2.2.2	*Because this project will rely on existing infrastructure….*	Confirm capacity of Zone and VCWWD infrastructure to accept projected flows
JDM-5	Menne	Technical	Feasibility of Project 2	7	2.2.2.3	*The cost to implement this project is driven by CMWD's water rates.*	Discuss reimbursement to Zone and VCWWD for use of their infrastructure and related costs.
JDM-6	Menne	General Technical	Feasibility of Project 3	8	2.2.3.2	*VCWWD-1 is conductiung a Feasibility Study…..*	Confirm the Study will include extimated capital costs and operating costs expressed as $ per AF
JDM-7	Menne	Technical	Need for adequate monitoring wells	18	2.2.9	*This project proposes installation of multi-level monitoring wells….*	Prioritize installation of sufficient number of monitoring wells/devices to adequately monitor basins' groundwater status and enhance future management and decision-making.
AAA-01	Art Aseo	General Technical	Addition of location map	N/A	N/A	*N/A*	Please consider adding a location map to show approximate location of planned projects that are reasonable to plot, understanding that some projects might be impossible to show locations.
AAA-02	Art Aseo	General Technical	Revise first sentence	8	2.2.3.2, Project Phasing and Timing	*VCWWD-1 is conducting a feasibility study for this project, which they anticipate completing by March 30, 2025.*	Change sentence to: "VCWWD-1 has completed the feasibility study for this project. The design is in progress with an anticipated completion by end of 2025." Please reflect same changes on Appendix B (page 50).
AAA-03	Art Aseo	General Technical	Revise second sentence	8	2.2.3.2, Project Phasing and Timing	*VCWWD-1 anticipates that construction of the diversion facilities could be completed in a single phase by June 30, 2027.*	Change sentence to: "VCWWD-1 anticipates that construction of the diversion facilities could be completed in a single phase by end of 2027." Please reflect same changes on Appendix B (page 50).
AAA-04	Art Aseo	General Technical	Additional sentences to address future extension of CMWD's SMP from Camarillo/Somis to Moorpark (Phase 2E), and the right-of-way acquisition for the Moorpark Desalter project.	10	2.2.4, second paragraph	*Add sentences after: Additionally, this project may require construction of additional pipeline to connect the desalter's brine disposal system to CMWD's Salinity Management Pipeline, which discharges brine from various desalters and water treatment plants to the Pacific Ocean.*	Add the following: "Also, CMWD's SMP will need to be extended from Camarillo/Somis to Moorpark to provide brine disposal. There is also a requirement to acquire a right-of-way or easement for the desalter and associated pipelines."
AAA-05	Art Aseo	General Technical	Moorpark Desalter's dependency on other project (CMWD's SMP)	46	Appendix B	*Not dependent on other unbuilt projects.*	VCWWD-1 believes that the Desalter project will be dependent on future CMWD's SMP (Phase 2E) for the disposal of brine water. Please reflect same comment on Appendix B (page 51, Dependency on Other Projects).
sm1	Steven Murata	general Technical	monitoring wells	19	2.2.9	*WLPMA and Oxnard SubBasin*	Del Norte Water Co. has several highly monitored wells in this area. I'm sure other exisiting well could be also set up for monitoring.
LS-1	Laurel Servin	General Editorial	Arundo removal project	1 - Dudek	Table 1	*Arundo donax removal, and periodic maintenance, from Arroyo Simi-Las Posas corridor*	The cost to maintain the removal of the arundo is unclear - would like clarification of the annual O&M plan. Also, I have personal experience with the removal of arundo on 6 acres along the barranca on my property. We replaced the arundo with mule fat and other native species, and the aggresive arundo regrowth was unmanageable. We installed special irrigation to support the new/replacement native species and followed all instructions to the letter; still, we could not keep the arundo regrowth away. I am concerned that the initial cost plus the ongoing cost to continually cut away the regrowth will cause exorbitant costs for such a small anticipated yield. Will any weed abatement products be allowable? Second, how will this support groundwater quality as stated in Appendix B?
LS-2	Laurel Servin	General Editorial	Page numbering throughout	All	Table of Contents	*Various*	The page numbering convention throughout the document needs work. Some pages have no numbers; multiple sections start over at Page 1 - the numbering should be revisited.
LS-3	Laurel Servin	General Editorial	Design and Installation of Dedicated Monitoring Wells	1 - Dudek and Appendix D-2, D-3	Table 1 and Appendix D-2 and D-3	*Construction of up to four (4) nested monitoring wells to address spatial data gaps in groundwater elevation monitoring the LPV*	Table 1 lists the construction of up to four (4) new monitoring wells: In Appendix D, pages D-2 and D-3, there are six new wells listed in six consecutive quarters. Conflicting information - needs correction.

DRAFT LAS POSAS VALLEY BASIN RESPONSE REPORT

Date: May 05, 2025

To: Las Posas Valley Watermaster Board of Directors

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

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

The Las Posas Valley Watermaster (Watermaster) requested consultation from the Las Posas Valley Technical Advisory Committee (TAC) on the draft Las Posas Valley (LPV) Basin Optimization Plan (draft BOP or dBOP). Watermaster's request was transmitted in a December 12, 2024, memorandum to TAC.

The TAC discussed and developed its recommendation report at December 17, 2024, January 7, 2025, and January 21, 2025, meetings. TAC's February 11, 2025, recommendations report included ten recommendations and an attachment with 129 comments by each of the TAC members on specific sections of the draft BOP. Each of these recommendations is listed below followed by Watermaster's response. Watermaster's responses to the 129 specific recommendations are included in the attached table.

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

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

1.1 Recommendations:

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

- Rework item 14 of the project scoring methodology to award more points for projects that address areas where modeling shows that undesirable results are likely under baseline conditions or add a 15th scoring criteria that specifically addresses project location in relation to undesirable results.

- Alternatively, divide proposed projects into 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.

Response to Recommendation 1:
Watermaster agrees with the general principle of this recommendation which is to focus in-lieu water-supply projects to areas of the LPV Basin which are most likely to experience undesirable results. The Groundwater Sustainability Plan (GSP) and the Periodic Evaluation of the GSP identified the eastern portion of the West Las Posas Management Area (WLPMA) and the northern portion of the East Las Posas Management Area (ELPMA) as the two areas most likely to experience undesirable results. The draft BOP did not explicitly identify the projects selected for implementation as Basin Optimization Projects. The final BOP includes Project 2, Purchase of Imported Water from Calleguas Municipal Water District for Basin Replenishment, and Project 7, In Lieu Deliveries to Northern East Las Posas Feasibility Study, as two of the selected Basin Optimization Projects for implementation. These projects focus on these two areas of the LPV Basin.

The following are Watermaster's responses to TAC's specific recommendations:

- The criteria and scoring in the Project Ranking Sheet were subject to TAC consultation and Watermaster Board review and acceptance. Revisions were made to the Project Ranking Sheet based on TAC's August 27, 2024, recommendations report and the revisions to the revised Project Ranking Sheet were reviewed and accepted by the Watermaster Board at its September 25, 2024, meeting. Therefore, it would not be appropriate to modify the Project Ranking Sheet further without going through a public process with Board review. TAC's recommendation should be considered for future BOPs.
- Review and selection of Basin Optimization Projects in the final BOP takes an approach similar to TAC's alternative recommendation. The narrative in the Benefits Relative to Sustainable Groundwater Management section for each of the projects evaluated includes consideration of whether the project specifically address mitigation of potential undesirable results.
- The narrative in final BOP Benefits Relative to Sustainable Groundwater Management section for each of the projects evaluated includes consideration of whether the project specifically addresses mitigation of potential undesirable results.

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. 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.
- 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.

Response to Recommendation 2:
Watermaster agrees with TAC's concerns regarding discussion and evaluation of interdependent projects. The final BOP includes an expanded narrative addressing interdependencies and includes a new table (Table 2) that clearly identifies these interdependencies and summarizes the additional water supply of the project alone and if other project(s) are implemented. Further, projects that are dependent upon other unfunded projects are evaluated and ranked in the final BOP based on their merits as stand-alone projects.

The following are Watermaster's responses to TAC's specific recommendations:

- The final BOP addresses the "institutional" relationships between projects and identifies projects with mutually exclusive benefits. Further, text and scoring have been revised to evaluate and rank projects based on the explicit benefit of the project to the LPV Basin, not

including benefit to a particular entity such as replacing imported water with product water which would provide no net additional water supply to the Basin.

- Projects dependent on other unfunded projects are now evaluated, ranked, and prioritized on their individual merits as stand-alone projects.
- Other dependent factors, as known, have been added to project evaluations.
- A new table has been added to the final BOP which clearly identifies project interdependence.

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.

Response to Recommendation 3:

Apparent inconsistencies in the draft BOP were principally due to the water supply and/or sustainable yield benefits of interdependent projects with, or without, the dependent project. As discussed in the response to Recommendation 2, a different approach to evaluating and ranking interdependent projects was used in the final BOP whereby projects that are dependent on other unfunded projects are evaluated on their own merits as stand-alone projects. A new Table 2 clearly lists interdependent project water-supply benefits as both a stand-alone project and if other dependent projects are implemented. Text has been clarified for Project 5, Arroyo Simi-Las Posas Water Acquisition, that this project would maintain existing flows in the Arroyo and the current sustainable yield and not provide additional benefit.

The following are Watermaster's responses to TAC's specific recommendations:

- The final BOP evaluates and scores projects dependent on other unfunded projects on their own merits as stand-alone projects.

- The benefit of Project 4, Moorpark Desalter, has been reevaluated. Because the project description from Ventura County Waterworks District No. 1 (VCWWD-1) states that the desalter project would increase pumping by 5,000 AFY for the purpose of reducing purchase of imported water from Calleguas Municipal Water District (CMWD), the project would have a net negative impact of -2,800 AFY on the total water supply in the ELPMA as currently scoped.
- The benefit of Project 6, Delivery of Recycled Water to Las Posas Valley Users via Pipeline, has been revised to be based on avoided evapotranspiration losses of the current discharge to Arroyo Simi-Las Posas. Text also discusses that Project 6 could potentially increase available groundwater storage space in the ELPMA, which could benefit Project 1, Arundo removal and Project 3, Arroyo Las Posas storm water capture and recharge. However, groundwater modeling would be required to evaluate this potential benefit. Additionally, the mutually exclusive relationship between Project 5 and Project 6 is clearly identified.

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

Response to Recommendation 4:

Project 5 would maintain discharges from the Simi Valley Water Quality Control Plant and Simi Valley dewatering wells to the Arroyo Simi-Las Posas, which is an important source of recharge to the ELPMA. Project 5 would not address the elevated salt concentrations from this water source. Project 4 proposes to extract impacted groundwater from the Shallow Alluvial Aquifer and desalt the extracted water. Insufficient information is available to quantify the water-quality benefits of Project 4. The final BOP states that a full feasibility study including numerical groundwater modeling and impact analysis would be needed to fully evaluate the potential benefits and impacts of the project before considering proceeding with implementation.

The following are Watermaster's responses to TAC's specific recommendations:

- The final BOP includes discussion of potential water-quality benefits and impacts and identifies where additional study is needed.
- Evaluation of water-quality benefits and potential impacts of Project 4 have not been conducted. This work would need to be conducted before considering implementation of this project. Project 4 is not recommended as a Basin Optimization Project in this BOP.

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 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.

Response to Recommendation 5:

Projects 2 and 7 have been revised based on TAC recommendations. Based on a meeting between FCGMA and VCWWD-1 staff, VCWWD-1 is presently not able to provide an estimate of additional CMWD imported water it could receive in lieu of pumping. Evaluation of records of the CMWD in-lieu program conducted in late 1995 through early 2007 indicates CMWD delivered an average of 1,380 AFY to VCWWD-1 over that time period. Project 2 has been revised in the final BOP to include this average annual quantity of in-lieu water in addition to the in-lieu water delivered to the WLPMA. This volume will also be simulated in groundwater modeling for the Basin Optimization Yield Study. Because the 1995 to 2007 in-lieu program did not fully mitigate the long-term groundwater decline in the northern ELPMA, Project 7 has been revised to evaluate the volume and location of supplemental supplies needed to fully mitigate these declines. Additionally, Project 7 would investigate sources of supplemental water, identify additional infrastructure or infrastructure upgrades needed to deliver supplemental water, and estimate capital and operation-and-maintenance costs to construct and implement the project.

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.

Response to Recommendation 6:
Watermaster agrees with TAC's recommendation and data-gap Projects 9 and 10 have been removed from the final BOP. These projects will be addressed in a separate technical memorandum.

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.

Response to Recommendation 7:
The schedule in the final BOP has been revised to include only the five projects recommended for selection as Basin Optimization Projects. Specific TAC member comments regarding the schedule have been considered and responded to in the attached table. The schedule has been revised as appropriate.

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.

Response to Recommendation 8:
Known cost information is included in the Cost and Funding sections of each project evaluation in the final BOP. Text has been added to explicitly identify that funding would need to come from Basin Assessments unless another funding source has been identified. The 5-year project implementation budget presented in Section 4 and Appendix D of the final BOP has been revised from the draft to include only the recommended Basin Optimization Projects. The 5-year implementation budget has been revised to include complete costs to the extent they have been identified. However, several of the projects include a first phase of project/ program development that will define the full project/ program scope which will help define the full project cost.

The following are Watermaster's responses to TAC's specific recommendations:

- Project costs have been reviewed and revised as needed for consistency.
- The costs of the five selected Basin Optimization Projects include capital and/or initial implementation costs, operation and maintenance or ongoing program implementation costs, Watermaster administration costs, and other identified costs, as applies to each specific project.
- The principal unit-based component of the selected Basin Optimization Projects is the cost to purchase CMWD water for Project 2. Projected CMWD Tier 1 water-rate increases have been included in the 5-year budget based on an average of recent CMWD rate increases.
- The funding mechanisms for each project have been described and are presumed to be from Basin Assessment unless another funding source has been identified.

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.

Response to Recommendation 9:
Text has been added to the Additional Project Considerations section of projects where potential impact to adjacent basins has been identified. Text indicates that these potential impacts should be evaluated in the CEQA analysis.

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.

Response to Recommendation 10:
The BOP text was reviewed and revised where appropriate in response to TAC's recommendations. The text and tables of the draft BOP have been revised, where appropriate, in response to TAC member comments provided in the table attached to the recommendation report. Detailed responses to each of the TAC member comments are included in the attached table.

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	Comment Response
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).	The criteria in the Project Ranking Sheet have gone through PAC and TAC consultation and it would be inappropriate to make additional revisions without opportunity for additional review and comment. That said, evaluation of a project's impact on the two water-deficient areas of the basin has been added to the evaluation in text and consideration for inclusion in the BOP for implementation. The document has been revised to select specific projects for inclusion in the BOP.
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.	Added.
BB-3	Bryan Bondy	Technical	Project No. 1 Water Supply / Yield Augmentation Benefit	Various	Table 1; 2.2.1, 2.2.2.1, 2.2.1.2, 2.2.1.4	*Table 1: Water Supply / Yield Augmentation Up to 2,680 AFY ; Section 2.2.1: "If all of the Arundo within the 324-acre area is removed, this project could result in up to an additional 2,680 AFY of recharge to the ELPMA (VCWSD 2015). This project is anticipated to increase groundwater recharge to the ELPMA and improve the health of riparian habitat along Arroyo Simi-Las Posas." Section 2.2.1.1: "Implementation of this project could increase recharge to the ELPMA by as much as 2,680 AFY (VCWSD 2015)." Section 2.2.1.2: "While this project is not dependent on other unbuilt projects, the full benefits of this project may require implementation of other projects." Section 2.2.1.4: "The increased recharge will directly impact the water levels and groundwater in storage to provide increased flexibility in basin management to maintain groundwater levels above minimum thresholds and at the measurable objectives."*	The First Periodic Evaluation of the LPVB GSP concluded that increased flows in Arroyo-Simi Las Posas above recent (2016-2023 average rates) does not significantly increase the volume of recharge to ELPMA. Therefore, at present, the water supply / yield augmentation benefit of Project No. 1 should be expected to be insignificant if implemented as a standalone project. Achieving the stated water supply / yield augmentation benefit would be fully dependent on implementation of another project(s), such as the Moorpark Desalter. Even then, this project would not address the two areas where modeling shows that undesirable results are likely under baseline conditions (i.e., eastern WLPMA and northern ELPMA) unless coupled with another project to offset pumping in those areas. The cited text, per AF cost, schedule, and project scoring should be revised accordingly.	Projects were rescored based on their stand-alone benefits.
BB-4	Bryan Bondy	Technical	Project No. 2 Water Supply / Yield Augmentation Benefit	Various	Table 1; 2.2.2.1	*Table 1: Water Supply / Yield Augmentation 1,760 AFY ; Section 2.2.2.1: "In 2019, it was estimated that 1,762 AFY of CMWD water would be available for purchase and delivery to Zone MWC and VCWWD-19.."*	The water supply / yield augmentation value for this project should be based on the amount of in-lieu deliveries necessary to stabilize groundwater levels in eastern WLPMA, which may be less than the 1,760 AFY of available water assumed during GSP development. The minimum amount of in-lieu necessary to avoid minimum threshold exceedances in the WLPMA pumping depression should be estimated via analysis of the relationship between groundwater levels and groundwater extraction rates. The cited text, per AF cost, and project scoring should be revised accordingly based on this initial in-lieu estimate. The in-lieu estimate should then be confirmed with modeling during BOYS development.	The comment extends beyond the scope of the BOP, the contents of which are set forth in section 5.3 of the Judgment. The results of the Basin Optimization Yield study can be used to refine future analyses in advance of the next BOP and Basin Optimization Yield study. Further, this project does not require capital expense and can be regularly reevaluated and amount of water purchased adjusted, as needed.

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	Comment Response
BB-5	Bryan Bondy	Technical	Project No. 3 Water Supply / Yield Augmentation Benefit	Various	Table 1;2.2.3.2; 2.2.3.4	*"Water Supply / Yield Augmentation Up to 2,000 AFY"; Section 2.2.3.2 "Additionally, while this project is not dependent on other unbuilt projects, the full benefits of this project may require implementation of other project"; Section 2.2.3.4 "Providing additional recharge to the ELPMA will directly impact groundwater levels, which are used to characterize the potential onset of undesirable results associated with the four sustainability indicators applicable to the LPV, by providing additional water supplies to the LPV. The implementation of this project would aid in maintaining groundwater elevations above the minimum thresholds throughout the ELPMA."*	The project location is immediately adjacent to Arroyo Las Posas. Groundwater levels at the project location are the same as the Arroyo Las Posas streambed, indicating there is little, if any, available storage space for the percolated stormwater. Much of the percolated stormwater is anticipated to mound and flow back into the arroyo. Therefore, at present, the water supply / yield augmentation benefit of Project No. 3 is anticipated to be considerably less than 2,000 AFY if implemented as a standalone project. The actual water supply / yield augmentation benefit of Project No. 3 should be estimated via modeling. Achieving the stated benefit is dependent on implementation of other projects, not "may" as indicated in the text. Achieving the stated water supply / yield augmentation benefit would be fully dependent on implementation of another project(s), such as the Moorpark Desalter. Even then, this project would not address the two areas where modeling shows that undesirable results are likely under baseline conditions (i.e., eastern WLPMA and northern ELPMA) unless coupled with another project to offset pumping in those areas. The cited text, per AF cost, schedule, and project scoring should be revised accordingly.	Text and scoring has been revised to evaluate this project as a stand-alone project without significant benefit to the Basin without a companion project such as the Moorpark Desalter to increase available groundwater storage volume in the southern ELPMA.
BB-6	Bryan Bondy	Technical	Project No. 4 Water Supply / Yield Augmentation Benefit	Various	Table 1; Section 2.2.4.1	*Table 1: Water Supply / Yield Augmentation Up to 2,200 AFY; Section 2.2.4.1: "Their groundwater flow modeling study suggests that pumping 6,270 AFY for the desalter project would result in an additional 2,200 AFY of recharge to the ELPMA. Based on this, it is estimated that this project would increase the sustainable yield of the ELPMA by 2,200 AFY."*	The water supply / yield augmentation benefit of Project No. 4 is incorrect. Assuming the values of pumping and additional recharge presented in the text are correct, the actual water supply / yield augmentation benefit of Project No. 4 is the difference between project pumping and increased recharge, which is -4,070 AFY (note: the negative sign indicates that, as a standalone project, it would simply increase ELPMA groundwater pumping by 4,070 AFY without an offsetting increase in recharge). However, the 2,200 AFY of increased recharge is based on old information about Simi inflows to the ELPMA, which have declined significantly since. Because Simi inflows have decreased, the amount of increased recharge induced by the project is likely less than 2,200 AFY under present and anticipated future conditions. Thus, the unmitigated groundwater pumping increase would likely be more than 4,070 AFY. While it may be possible to increase pumping by some amount in this part of the Basin without triggering additional undesirable results (that should be quantified with modeling), doing so would not address the two areas of the Basin where modeling shows that undesirable results are likely under baseline conditions (i.e., eastern WLPMA and northern ELPMA) unless coupled with another project to offset pumping in those areas. The cited text, project costs, and project scoring should be revised accordingly.	Text has been revised to reflect potential negative impact to ELPMA water supplies as the difference between VCWWD-1's "likely request" for an additional 5,000 AFY of allocation and the additional 2,200 AFY of potential recharge, or -2,800 AFY. Project scoring has been revised. Project costs are unaffected.
BB-7	Bryan Bondy	Technical	Project No. 4 Water Supply / Yield Augmentation Benefit	11	Section 2.2.4.4	*"Implementation of this project is anticipated to improve groundwater quality by removing constituents of concern from the southern portion of the ELPMA, which has been impacted by degraded water quality resulting from surface water recharge originating from outside the LPV boundaries. The project aims to achieve these goals by pumping and treating high-TDS groundwater from southern portion of the ELPMA. In doing this, the project would: (1) reduce the dependence on imported water in the LPV by providing new local potable supplies, (2) improve groundwater quality in the southern portion of the ELPMA, and (3) create additional underground storage within the ELPMA"*	It is unclear how the project will improve insitu groundwater quality if the source of poor quality water (recharge of inflows from Simi Valley and percolated treated wastewater at the Moorpark Water Reclamation Facility) continues. The water quality benefits should be clarified and/or caveated.	Statement caveated that a full feasibility study including numerical groundwater modeling is needed to quantify these benefits.
BB-8	Bryan Bondy	Editorial	Clarification	11	Section 2.2.4.4	*"Providing additional recharge to the ELPMA will directly impact groundwater levels..."*	This text is misleading as it implies the project will improve groundwater levels. As discussed in comment BB-6, the net effect of Project No. 4 will be a minimum 4,070 AFY increase in unmitigated pumping demand on the ELPMA, which will cause groundwater level declines. The text should be revised.	Text has been revised.

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

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment	Comment Response
BB-9	Bryan Bondy	Clarification	Project No. 5 Water Supply / Yield Augmentation Benefit	Various	Table 1; Section 2.2.5.1	*Table 1: "Water Supply / Yield Augmentation Up to 4,700 AFY"; Section 2.2.5.1 "this project could increase the sustainable yield of the ELPMA by as much as 2,000 AFY"*	Conflicting values of water supply / yield augmentation are provided in the cited portions of the document. These should be reconciled.	Table and text have been revised to state that project implementation would prevent up to 2,200 AFY loss of sustainable yield.
BB-10	Bryan Bondy	Technical	Project No. 5 Water Supply / Yield Augmentation Benefit	Various	Table 1; Section 2.2.5; and Section 2.2.5.1	*Section 2.2.5.1 "this project could increase the sustainable yield of the ELPMA by as much as 2,000 AFY"*	Project No. 5 will not increase the sustainable yield of ELPMA. Rather, Project No. 5 will maintain existing recharge sources that are already accounted for in the sustainable yield. This should be made clear in the document.	The text has been revised.
BB-11	Bryan Bondy	Technical	Project No. 5 Water Supply / Yield Augmentation Benefit	12	Section 2.2.5.2	*Additionally, the full benefits of this project may require implementation of other projects, like the Moorpark Desalter (Project No. 4), which lowers groundwater elevations in the Shallow Alluvial Aquifer, and the Arundo Removal Project (Project No. 1), which reduces evapotranspiration losses upstream of the LPV.*	As mentioned in Comment No. BB-3, the First Periodic Evaluation of the LPVB GSP concluded that increased flows in Arroyo-Simi Las Posas above recent (2016-2023 average rates) does not significantly increase the volume of recharge to ELPMA. Therefore, even if Project No. 5 is coupled another project that lowers groundwater elevations in the Shallow Alluvial Aquifer, there is no additional discharge volume from Simi Valley to recharge in ELPMA (i.e., all of the available discharge is already percolating into the basin).	The text has been revised.
BB-12	Bryan Bondy	Technical	Project No. 5 Other Benefits	13	Section 2.2.5.4	*"Additionally, this project would maintain native habitat and provide flood control benefit."*	The habitat along the Arroyo Las Posas is not native. The habitat was recruited by and is maintained by discharges of non-native water (i.e., wastewater plants and dewatering wells). Air photos show that the "native habitat" before discharges on non-native water was a dry, sandy wash. It is unclear how maintaining flows in the arroyo provides a flood control benefit.	The text has been revised to: "Additionally, this project would maintain habitat that has developed since SVWQCP discharges upstream of the ELPMA resulted in perennial flow in Arroyo-Simi Las Posas."
BB-13	Bryan Bondy	Technical	Project No. 5 Other Benefits	13	Section 2.2.5.4	*"Consequently, the water quality of the surface water flows will have to be investigated further and addressed through project implementation."*	It is unclear what is meant here. Please elaborate and consider tying in with the Salts TMDL.	The text has been revised.
BB-14	Bryan Bondy	Technical	Project No. 6 Water Supply / Yield Augmentation Benefit	Various	Table 1; Section 2.2.6.1	*Table 1: "Water Supply / Yield Augmentation Up to 3,000 AFY"; Section 2.2.6.1 "In 2017, the City indicated that approximately 3,000 AFY of recycled water would be available for delivery to Berylwood Heights MWC and Zone MWC."*	The water supply / yield augmentation benefit of Project No. 6 is incorrect because diverting 3,000 AFY of recycled water from Simi Valley for pipeline delivery would reduce the amount water that percolates into ELPMA along the arroyo. The actual water supply benefit of Project No. 6 is equal to the amount of avoided evapotranspiration losses along the arroyo. The sustainable yield increase would depend on where the water is delivered, with maximal benefit for delivery to one or both areas of the Basin where modeling shows that undesirable results are likely under baseline conditions (i.e., eastern WLPMA and northern ELPMA) and minimal benefit elsewhere. The cited text, per AF costs, and project scoring should be revised accordingly.	The text has been revised to include a discussion of the per acre foot costs, to the extent that they are currently understood. The project scoring and Table 1 have been revised to reflect a project yield based on avoided ET losses.
BB-15	Bryan Bondy	Technical	Project No. 6 Cost per AF	15	Section 2.2.6.4	*"This does not include the cost to purchase and/or lease water from the City."*	It is unclear why the purchase cost is omitted. An estimate could easily be obtained by asking Simi Valley for the current recycled water purchase agreement.	The text has been revised to discuss the cost in the context of Project No. 5.
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.	VCWWD-1 was unable to provide estimate at this time of additional CMWD water it could take in lieu of pumping. In lieu deliveries for the prior program from 1995 through 2007 of 1,380 AFY has been added to Project 2 for BOYS modeling. The Project 7 feasibility study would utilize groundwater modeling to evaluate the volume and location of supplemental supplies needed to fully mitigate groundwater declines in the northern ELPMA, investigate sources of supplemental water, identify additional infrastructure or infrastructure upgrades needed to deliver supplemental water.
BB-17	Bryan Bondy	Technical	Project No. 10 Costs	21	2.2.10.3	*"The cost is anticipated to be approximately $140,000 for eleven well locations"*	The project cost is likely underestimated. Installation of sounding tubes in just a few wells that require pump removal and reinstallation could easily cost more than $140,000.	Projects 9 and 10 are not strictly Basin Optimization Projects per the Judgment and have been removed from the BOP in response to TAC comments and will be addressed in a separate technical memorandum.

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	Comment Response
BB-18	Bryan Bondy	Technical	Project Prioritization	22-23	2.3	N/A	Please revise based on earlier comments.	Revised.
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.	See response to BB-16.
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).	See response to BB-17.
BB-21	Bryan Bondy	Editorial	Clarification	1	1.1, footnote no. 1		Because footnote no. 1 is the Judgement definition of the term Operating Yield (Judgment Section 1.73), greater clarity could be achieved by placing the footnote immediately following "Operating Yield" instead of the end of the sentence. Doing so would clarify that the footnote applies to the term "Operating Yield" not the quantity 40,000 AFY.	Footnote has been moved.
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.).	Source section reference has been added.
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.	Zero has been added.
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.	Sentence has been deleted.
BB-25	Bryan Bondy	Editorial	Pagination	N/A	N/A	N/A	Page numbers reset to 1 after page 2.	Page numbers have been updated.
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.	Appendix C schedule has been revised to include only the projects for inclusion in the BOP as well as for clarity.
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?	Project 1 is the only construction project in the schedule with O&M. Projects 2 and 5 show ongoing active project implementation, the remaining construction projects in the schedule are for feasibility studies.
BB-28	Bryan Bondy	Clarification	Project Schedules	N/A	Appendix C	N/A	Project No. 4 schedule seems aggressive.	The schedule in Appendix C was for a feasibility study, not project implementation. Projects not recommended for implementation have been removed from Appendices C & D.
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.	The project schedule is for a feasibility study, not implementation.
BB-30	Bryan Bondy	Editorial	Spelling	N/A	Appendix C & D	*"Phase II: Well Construction"*	Spelling "Construction"	Corrected.
BB-31	Bryan Bondy	Editorial	Executive Summary	N/A	N/A	N/A	Consider adding an executive summary.	Because the project evaluations and selection require significant detail, the document does not lend itself to an executive summary. However, the introduction has been expanded to assist the reader.
BB-32	Bryan Bondy	Editorial	Project Dependencies Graphic	N/A	N/A	N/A	Consider adding a graphic that visually communicates project interdependencies.	A table has been added to show project interdependencies.

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

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment	Comment Response
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.	Revised to reference Appendix A in each subsection.
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.	The Plan has been revised to evaluate Arundo removal as a stand-alone project and proceeding with this project is not recommended until a required companion project is implemented. Note that Project 4 is for a feasibility study, it is not sufficiently scoped and evaluated to include in BOYS modeling.
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	Zero has been added.
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.	Text and scoring has been revised to evaluate this project as a stand-alone project without significant benefit to the Basin without a companion project such as the Moorpark Desalter to increase available groundwater storage volume in the southern ELPMA.
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.	Period has been added.
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?	Sentence has been deleted.
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.	Insufficient information was provided by VCWWD-1 to fully evaluate the Moorpark Desalter or include it in BOYS modeling. Projects 1 and 3 were re-scored as stand-alone projects and are not recommended for implementation at this time. Project 5 is not dependent upon the Moorpark Desalter project.
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?	Changed to "first."
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.	Text referencing Project 4 has been removed. This project would maintain existing flow and recharge.
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.	Sub heading has been deleted.
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?	Correct, the proposed project, if implemented, would be a demand-reduction program. Text has been revised and the range of demand reduction has been assumed to be >500 <2,500 AFY for scoring.
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?	Sub heading has been deleted.

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	Comment Response
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)	Projects 9 and 10 are not strictly Basin Optimization Projects per the Judgment and have been removed from the BOP in response to TAC comments and will be addressed in a separate technical memorandum.
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.	See response to BA-13.
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.	See response to BA-7.
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.	See response to BA-7.
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	Project 8 has been rescored, however, the policies, costing mechanisms, and funding allocated, need to be developed in Project 8 to provide reasonable quantification of the program for BOYS modeling.
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	See response to BA-13.
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?	Project 8 has been rescored with an assumed range of >500 <2,500 AFY. The actual amount will depend on the funding allocated from Basin Assessment, the cost of allocation purchase, and the willingness of Water Right Holders to sell.
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?	The program has an indefinite lifespan and scoring has been revised accordingly. Agreed that purchase of Allocation Basis would be in perpetuity, however, Annual Allocation and Carryover purchases would be for a given water year.
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.	See response to BA-13.
BA-22	Bob Abrams	Technical		B-3	Project 8	*Impacts on Sustainability Indicators 10*	Could be 20 if demand reduced?	Program implementation may help address chronic lowering of groundwater levels and decreases in groundwater in storage. Scoring revised to 15 points for addressing two sustainability indicators.
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?	See response to BA-13.
BA-24	Bob Abrams	Technical		B-3	Project 9	*Impacts on Sustainability Indicators 10*	Could be 20 if it demonstrates SGM?	See response to BA-13.
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?	See response to BA-20.
BA-26	Bob Abrams	Technical		B-11	Project 8	*Additional benefits, Indicators' - mitigate one*	Could be 20 if demand reduced?	See response to BA-22.
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.	See response to BA-13.
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?	See response to BA-13.

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	Comment Response
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?	The document has been revised to select projects for inclusion in the BOP for implementation. Appendices C & D have been revised to include only those projects selected for implementation. It should be noted that the BOP is a plan subject to Watermaster Board approval; budgeting and assessments to fund projects will need to go through Board process with committee consultation.
BA-30	Bob Abrams	Technical			Appendix C		Why does Phase I: Work Plan Development for Project 1 Arundo removal take 23 months?	The scope includes developing an RFP to engage a consultant; updated vegetation mapping and quantification including field surveys; identification and securing access agreements with landowners; development of a reed removal workplan and restoration plan; acquisition of environmental permits and compliance coordination. These activities are projected to require 24 months.
BA-31	Bob Abrams	Technical			Appendix C		Why is Project 7 In Lieu Deliveries to Northern ELPMA not looked at until 2027?	Project 7 start date moved earlier.
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	See response to BA-13.
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).	It is correct that only 2 of the 8 implementation projects (2 and 8)address the WLPMA. The two data-gap projects (9 and 10) also address the WLPMA.

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

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment	Comment Response
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 ??	The BOP provides the analysis and details by which the Watermaster Board can make determinations, with committee consultation, on which projects to fund. The majority of the proposed projects have insufficient information to develop full implementation details and require full feasibility studies which is beyond the scope of the BOP.
TM-2	TMorgan	General Editorial	plan scope	NA	NA	*NA*	How do the prioritized projects address the GW problems in each basin? Same for the "Feasibilty Study" group of projects. The link between solving basin issues and these projects is not clearly laid out. Maybe a matrix showing which projects address each problem would focus this discussion.	Evaluation of a project's impact on the two water-deficient areas of the basin has been added to the evaluation in text and consideration for inclusion in the BOP for implementation. The document has been revised to select specific projects for inclusion in the BOP.
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.	Text has been revised to discuss source of funding. Most projects would need to be funded by Basin Assessment. Of course, WM staff are continuously monitoring for potential grant funding that may come available.
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.	Interdependent projects have been revaluated on their own merits as standalone projects. A table has been added to show the interdependencies and the differences in estimated benefits of standalone versus multiple-project implementation.
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.	The second portion of the sentence clarifies the uncertainty "...and evaluates the likelihood of a project's ability to be implemented and operation prior to 2040." Further, reference to the Project Ranking Sheet in Appendix A has been added to the end of the section.
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.	Revised.
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? .	Revised.
TM-8	TMorgan	Technical	language clarification	5	2.2.1.2	*...the full benefits of this project may require implementation of other projects, like the Moorpark Desalter (Project No. 4), that lower groundwater elevations in the Shallow Alluvial Aquifer to increase available storage in the ELPMA and limit discharge of the increased arroyo flows downstream...*	The interdependencies between projects are not emphaszed adequately in the document. The benefits of this project are not fully realized unless the Moorpark Desalter project is implemented, but the desalter project is not among the prioritized projects and is not proposed for inclusion in the BOYS (Table 3). Does this mean that Arundo removal should be contingent on the desalter project? How would the modeling be performed to show the benefits of the Arundo removal without also including the desalter project?	The Plan has been revised to evaluate Arundo removal as a stand-alone project and proceeding with this project is not recommended until a required companion project is implemented.
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).	Annual O&M costs in Appendix D were incorrectly listed as quarterly cost. Total capital cost is $9,100K + $400K which is $380K per year over 25 years. Annual O&M costs are $670K. Total cost is $380K + $670K / 2,680 = $392/AF.
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.	Annual O&M costs are estimated at $670,000, this was incorrectly listed as quarterly costs. Appendix D has been corrected.

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	Comment Response
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?	Text has been revised to explain that annual extractions have averaged 2,600 AFY more than the sustainable yield of the ELPMA. Additionally, text was revised to state that the project would not be expected to benefit the northern portion of the 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?	Projects 9 and 10 are not strictly Basin Optimization Projects per the Judgment and have been removed from the BOP in response to TAC comments and will be addressed in a separate technical memorandum.
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.	See response to TM-12.
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).	The project text has been revised for two phases. The first phase will be development of program policy and incentive amount by the WM Board. Text has been revised to state project would be funded by Basin Assessment.
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.	Text revised.
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.	Project associated policies and funding through basin assessments will be developed through WM Board process including water right holders engagement, principally through PAC consultation.
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)?	Text revised.
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?	Potential impacts of the project would need to be evaluated in feasibility and CEQA/NEPA studies. This project will not be included in BOYS modeling.
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.	The timeline was provided by VCWWD-1, the project proponent. We agree it is optimistic. However, this project is not recommended for consideration of implementation in the revised BOP unless and until a companion project to lower groundwater levels in the area is implemented.
TM-20	TMorgan	Technical	language clarification	9	2.2.3.2	*...the full benefits of this project may require implementation of other projects, like the Moorpark Desalter (Project No. 4), that lower groundwater elevations in the Shallow Alluvial Aquifer to provide adequate available storage to realize the full benefits of recharge to the ELPMA.*	The interdependencies between projects are not emphaszed adequately in the document. The benefits of this project are not fully realized unless the Moorpark Desalter project is implemented, but the desalter project is not among the prioritized projects and is not proposed for inclusion in the BOYS (Table 3). Does this mean that stormwater capture should be contingent on the desalter project? How would the modeling be performed to show the benefits of the stormwater capture without also including the desalter project?	Text and scoring has been revised to evaluate this project as a stand-alone project without significant benefit to the Basin without a companion project such as the Moorpark Desalter to increase available groundwater storage volume in the southern ELPMA. his project will not be included in BOYS modeling.
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?	Text has been revised to note that no funding sources to construct this project have been identified by VCWWD-1 other than potential federal or state grants or loans.

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	Comment Response
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.	CDFW, RWQCB, and ACOE, are permitting agencies and are identified under "Environmental and Permitting."
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?	Potential impacts of the project would need to be evaluated in feasibility and CEQA/NEPA studies. This project will not be included in BOYS modeling.
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?	Text revised to indicate that project would not be expected to benefit the northern portion of the ELPMA.
TM-25	TMorgan	Technical	project water balance	10	2.2.4	*...groundwater flow modeling study suggests that pumping 6,270 AFY for the desalter project would result in an additional 2,200 AFY of recharge to the ELPMA.*	2,200AFY of enhanced surface water recharge is partiallly offset by the exported brine ~1,568AFY (assumed 25% of 6,270AFY) = 632AFY. The net benefit appears to be much less that 2,200 AFY of additional recharge.	Text has been revised to reflect potential negative impact to ELPMA water supplies as the difference between VCWWD-1's "likely request" for an additional 5,000 AFY of allocation and the additional 2,200 AFY of potential recharge, or -2,800 AFY. Project scoring has been revised.
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?	See response to TM-25.
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).	Text has been revised.
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...	Text has been clarified to state that "other than preliminary groundwater modeling conducted in 2016, VCWWD-1 has not completed a full feasibility study for this project."
TM-29	TMorgan	Technical	project costs	11	2.2.4.3	*No outside sources of funding to construct this project have been identified.*	Is the project proponent suggesting it bear the full costs of this $40,000,000 (CAPEX) project? The funding element is not discussed. Will pumpers in the basin be expected to cover the CAPEX and OPEX costs since no outside funding sources have been identified?	VCWWD-1 has not fully identified the costs including O&M nor have they identified a source for the funding.
TM-30	TMorgan	General Editorial	incomplete sentence	11	2.2.4.4	*...distribution of desalted water, this project.*	incompete sentence...missing words after "...this project."	Revised.
TM-31	TMorgan	Technical	project benefits	12	2.2.5.1	*...implementation of this project could increase the sustainable yield of the ELPMA by as much as 2,000 AFY.*	How does securing this water flow into the future increase the sustainable yield? This flow is happening now, so this input was used to calculate the current sustainable yield. Isn't the idea behind this project to secure this water source into the future?	Text revised to clarify that this project would maintain existing flows.
TM-32	TMorgan	Technical	project premise	13	2.2.5.4	*...perennial surface water flow in Arroyo Simi-Las Posas is also thought to be the primary source of high TDS concentrations observed in the groundwater in the southern ELPMA (FCGMA 2019). Consequently, the water quality of the surface water flows will have to be investigated further and addressed through project implementation.*	This statement says that we don't know if the water quality of the surface water flows would actually support the project contentions that high TDS GW originated from the surface water AND it is "unknown" if the future water quality would be sufficiently better that the GW quality would improve enough to justify the project costs. Feels like the basic premise of the project is suspect if the water quality must be studied further and possibly addressed by adaptive management.	Text has been clarified.
TM-33	TMorgan	Technical	project benefits	13	2.2.5.4	*...and provide flood control benefit.*	This is the first mention of flood control benefits. How does this benefit fit into the optimization goal of achieving and maintaining the Operational Yield at 40,000 AFY?	Reference to flood control benefit was removed.
TM-34	TMorgan	Technical	project impacts	14	2.2.6.1	*...the City indicated that approximately 3,000 AFY of recycled water would be available...*	What is the impact to the Simi Valley basin of exporting 3,000 AFY of recycled water? How will this plan evaluate this potential impact? This is an in-lieu project...substituting imported recycled water for GW extractions.	Potential impacts of the project would need to be evaluated through the proposed feasibility study. Text has been revised.
TM-35	TMorgan	Technical	project impacts	14	2.2.6.2	*Project benefits.*	Suggest saying "Project benefits and impacts"	Revised.

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

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment	Comment Response
TM-36	TMorgan	Technical	project costs	15	2.2.6.3	*...does not include any costs required to construct, operate, and maintain local desalters to treat the recycled water...*	Suggest adding text to acknowledge that these costs do not include the costs of brine disposal from the desalters which could include a brine pumping station and conveyance pipeline. Is the brine envisioned to be disposed of in the SMP? If the SMP is the disposal mechanism, then the costs do not include the connection fees (and construction costs to make the connection) or the ongoing unit disposal costs. The costs for this project are much greater than $700/AF.	Project 6 is for a proposed feasibility study, which would identify all potential costs. Text indicates that operational costs of desalters was not included in the per AF estimate. The estimate was revised per the 2017 study to approximately $1,200 per AF.
TM-37	TMorgan	General Technical	agency collaboration	15	2.2.6.4	*...will require coordination between FCGMA, the City, and Las Posas Valley Users*	Suggest adding RWQCB to the list.	Revised.
TM-38	TMorgan	Technical	project impacts	15	2.2.6.4	*...water level recovery benefits would be quantified through numerical modeling conducted in the Phase I Feasibility Study.*	Section 2.2.6.2 does not include GW modeling in the Phase I Feasibility activities. What GW model would be used to assess the impact to Simi Valley basin of this water export to the LPV basin?	Potential benefits and impacts to the ELPMA would be evaluated with the existing groundwater model. Groundwater modeling would not be used to evaluate potential impacts to the Simi Valley basin in the feasibility study.
TM-39	TMorgan	Technical	project description	15	2.2.7	*...evaluate the feasibility of providing supplemental water supplies...*	It would be helpful to the reader to know the potential source(s) of supplemental water that are proposed to be evaluated. This information could also be included in Section 2.2.7.1.	Text revised to state that the feasibility study will investigate sources of supplemental water.
TM-40	TMorgan	Editorial	grammar / editorial	16	2.2.7.1	*...willing to use...*	willingness to use	Revised
TM-41	TMorgan	Technical	project concept	16	2.2.7.1	*...will not provide a new source of water supply to the LPV...*	Reader is left wondering what this project does... if it doesn't supply new water to the area, is it a demand reduction project? Section 2.2.7 indicated "Supplemental water supplies to this area will reduce groundwater demand in this part of the ELPMA."	Statement was intended to inform reader that the proposed project is a feasibility study, not the project itself. Text has been revised for clarity.
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.	Text completed in this section.
TM-43	TMorgan	Technical	project description	17	2.2.7.5	*...identify entities that are able to receive and deliver supplemental water...*	Suggest including the potential supplies of the supplemental water in this sentence. ...identify entities that are able supply or receive and deliver supplemental water...	Revised.
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.	Text has been completed in this section.
TM-45	TMorgan	Technical	entity collaboration	18	2.2.8.5	*...will require coordination between FCGMA and the PAC and TAC...*	Add "basin stakeholders" to this sentence.	Basin stakeholder participation is via the PAC and TAC.
TM-46	TMorgan	Technical	project costs	22	2.3.1	*...sufficiently defined to implement without additional feasibility studies to define project scopes, costs, and benefits.*	Many of the projects do not have defined costs for both CAPEX and OPEX. OPEX, for several projects, is poorly assessed or not assessed at all. The interdependencies of some projects with others (to achieve the stated anticipated benefits) means that the actual costs for some projects are not stand alone values and should be viewed in conjunction with the interdependent project costs.	Projects were rescored based on their standalone benefits without the dependent project(s). Based on this evaluation, projects were selected for inclusion in the BOP for implementation. Projects that are feasibility studies will provide better estimates of capital and O&M costs for implementation.
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.	Text has been revised. We note that costs were caveated in the final sentence of this paragraph.
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).	Revised to display all text.
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?	Text has been revised to address cost uncertainty.
TM-50	TMorgan	Editorial	document organization	D-1	Appendix D	*Phase II: Well Construstion*	typo under Project 9 - Construction. This continues across each matrix in this Appendix.	See response to TM-12.
TM-51	TMorgan	Editorial	document organization	D-1	Appendix D	*NA*	the Notes have odd fonts - readable, but odd	Noted. Font is consistent throughout appendix.

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	Comment Response
TM-52	TMorgan	Editorial	document organization	D-2 through D-6	Appendix D	*NA*	the Notes text is truncated	Revised to display all text.
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.	The Budget in Appendix D has been revised to provide clearer presentation of capital and O&M costs. Footnotes have been added regarding uncertainty. Placeholder WM admin costs have been added; projected costs will be estimated during the first phase of each implementation project or during the study for feasibility study projects.

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	Comment Response
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.	Estimated cost per AF from Appendix B added to Cost and Funding section for each project.
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.	Revised to display all text.
CT-3	Chad Taylor	Editorial	Project 1 Phase II cost value appears to be missing a 0	6	2.2.1.3, second paragraph	*Adjusting The Nature Conservancy's cost estimates by the increase in Consumer Price Index (CPI) between 2020 and 2024 leads to a capital cost estimate for Phase II of $9,100,00 and an O&M cost of $250 per acre-foot (AF) of water.*	The referenced cost of $9,100,00 is either missing a zero or the commas are misplaced. Based on the stated unit price of water supply it appears that a zero is missing.	Zero has been added.
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.	Corrected to reference 1995 to 2008 program years in all paragraphs.
CT-5	Chad Taylor	Editorial	Explain costs for Project 2	7	2.2.2.3	*The cost to implement this project is driven by CMWD's water rates. CMWD's 2024 Tier 1 water rate is $1,730 per AF. This cost includes O&M to maintain CMWD's conveyance infrastructure. The project is envisioned to incentivize VCWWD-19 and Zone MWC by funding the difference between the cost of CMWD and the cost of pumping.*	Please provide an estimate of what the incentive cost offset might be.	The cost offset is not presently known and would need to be determined as part of project development.
CT-6	Chad Taylor	Technical / Editorial	Explain rationale for water supply estimte for Project 4	10	2.2.4.1	*VCWWD-1 has conducted preliminary numerical groundwater flow modeling to evaluate project feasibility. Their groundwater flow modeling study suggests that pumping 6,270 AFY for the desalter project would result in an additional 2,200 AFY of recharge to the ELPMA. Based on this, it is estimated that this project would increase the sustainable yield of the ELPMA by 2,200 AFY. Additional modeling is required to evaluate the effects of the proposed desalter under scenarios that are consistent with those evaluated in the GSP and Basin Optimization Yield study.*	Please explain how pumping 6,720 AFY of water to effect 2,200 AFY of recharge results in a sustainable yeild increase of 2,200 AFY. Does this mean that total recharge would equal 8,920 AFY because the 2,200 AFY is truly additional recharge? Readers are likely to see an extraction of 6,720 AFY less recharge of 2,200 AFY and assume that sums to a loss of 4,520 AFY.	Text has been revised to reflect potential negative impact to ELPMA water supplies as the difference between VCWWD-1's "likely request" for an additional 5,000 AFY of allocation and the additional 2,200 AFY of potential recharge, or -2,800 AFY. Project scoring has been revised.
CT-7	Chad Taylor	Editorial	Missing text	11	2.2.4.4, end of second paragraph	*Depending on the operational conditions and distribution of desalted water, this project.*	This sentence appears to be missing text	Sentence has been deleted.
CT-8	Chad Taylor	Technical	Water quality impacts from Project 5	13	2.2.5.4	*While implementation of this project is anticipated to support groundwater level and storage management within the ELPMA, perennial surface water flow in Arroyo Simi-Las Posas is also thought to be the primary source of high TDS concentrations observed in the groundwater in the southern ELPMA (FCGMA 2019). Consequently, the water quality of the surface water flows will have to be investigated further and addressed through project implementation.*	The potential for water quality impacts to groundwater resulting from this project are concerning, especially as Project 4 is intended to address a similar existing issue stemming from the same water source as the one identified for Project 5.	Comment noted.
CT-9	Chad Taylor	Technical	Recycled water desalter costs for individual recipients	14 - 15	2.2.6.2 & 2.2.6.3	*Additionally, recipients of the recycled water may be required to construct, operate, and maintain desalter facilities to reduce constituent concentrations to levels suitable for irrigation and to ensure that long-term use of this water does not result in a significant and unreasonable degradation of water quality in the LPV.*	Does the cost estimate in section 2.2.6.3 include the costs to individual recycled water recipients for construction, operation, and maintenance of desalter facilities to use recycled water? If not, what are those estimated costs and who would bear them?	The cost estimate in section 2.2.6.3 is based on a 2017 study. Project costs would need to be fully evaluated in the Phase I feasibility study. No matching funds have been identified and both capital and O&M costs would need to be funded through Basin Assessment. Text has been revised accordingly.
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.	Text has been revised.
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	Projects 9 and 10 are not strictly Basin Optimization Projects per the Judgment and have been removed from the BOP in response to TAC comments and will be addressed in a separate technical memorandum.

February 11, 2025

RECOMMENDATION REPORT

To: Las Posas Valley Watermaster

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

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

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

TAC RECOMMENDATIONS

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

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

1.1 Recommendations:

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

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

1.2 Technical Rationale for Recommendation:

Sustainability in the LPVB is not solely a function of the basin-wide water budget. Increasing potential inflow to the basin-wide water budget in areas where current and historical conditions do not require augmentation does not directly address conditions in areas where undesirable results are occurring 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[1]. 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.
- 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 confused as to why modeling of Project 4 is not included when Project 1 appears dependent

[1] 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.

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.

2.4 Additional Comments

The TAC recognizes that the Moorpark Desalter project (dBOP Project 4) as currently described is institutionally linked to the Arroyo Las Posas stormwater capture and recharge project (dBOP project 3). As noted above, both projects are sponsored by Water Works District 1. In discussions of the Moorpark Desalter project, TAC members noted that this project may have more benefit and be more successful if it were reconceptualized to a regional effort with wider application and sponsorship by the Watermaster.

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

On February 11, 2025 the TAC voted to approve the content of this Recommendation Report and authorize the TAC Administrator to submit it to the Watermaster. The vote was unanimous, as shown below.

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

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. No minority positions were expressed by voting or non-voting TAC members.

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	*Table 1: Water Supply / Yield Augmentation Up to 2,680 AFY ; Section 2.2.1: "If all of the Arundo within the 324-acre area is removed, this project could result in up to an additional 2,680 AFY of recharge to the ELPMA (VCWSD 2015). This project is anticipated to increase groundwater recharge to the ELPMA and improve the health of riparian habitat along Arroyo Simi-Las Posas." Section 2.2.1.1: "Implementation of this project could increase recharge to the ELPMA by as much as 2,680 AFY (VCWSD 2015)." Section 2.2.1.2: "While this project is not dependent on other unbuilt projects, the full benefits of this project may require implementation of other projects." Section 2.2.1.4: "The increased recharge will directly impact the water levels and groundwater in storage to provide increased flexibility in basin management to maintain groundwater levels above minimum thresholds and at the measurable objectives."*	The First Periodic Evaluation of the LPVB GSP concluded that increased flows in Arroyo-Simi Las Posas above recent (2016-2023 average rates) does not significantly increase the volume of recharge to ELPMA. Therefore, at present, the water supply / yield augmentation benefit of Project No. 1 should be expected to be insignificant if implemented as a standalone project. Achieving the stated water supply / yield augmentation benefit would be fully dependent on implementation of another project(s), such as the Moorpark Desalter. Even then, this project would not address the two areas where modeling shows that undesirable results are likely under baseline conditions (i.e., eastern WLPMA and northern ELPMA) unless coupled with another project to offset pumping in those areas. The cited text, per AF cost, schedule, and project scoring should be revised accordingly.
BB-4	Bryan Bondy	Technical	Project No. 2 Water Supply / Yield Augmentation Benefit	Various	Table 1; 2.2.2.1	*Table 1: Water Supply / Yield Augmentation 1,760 AFY ; Section 2.2.2.1: "In 2019, it was estimated that 1,762 AFY of CMWD water would be available for purchase and delivery to Zone MWC and VCWWD-19.."*	The water supply / yield augmentation value for this project should be based on the amount of in-lieu deliveries necessary to stabilize groundwater levels in eastern WLPMA, which may be less than the 1,760 AFY of available water assumed during GSP development. The minimum amount of in-lieu necessary to avoid minimum threshold exceedances in the WLPMA pumping depression should be estimated via analysis of the relationship between groundwater levels and groundwater extraction rates. The cited text, per AF cost, and project scoring should be revised accordingly based on this initial in-lieu estimate. The in-lieu estimate should then be confirmed with modeling during BOYS development.

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

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

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

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

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

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

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

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

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

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

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

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

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 emphaszed adequately in the document. The benefits of this project are not fully realized unless the Moorpark Desalter project is implemented, but the desalter project is not among the prioritized projects and is not proposed for inclusion in the BOYS (Table 3). Does this mean that stormwater capture should be contingent on the desalter project? How would the modeling be performed to show the benefits of the stormwater capture without also including the desalter project?
TM-21	TMorgan	Technical	project costs	9	2.2.3.3	*No outside sources of funding to construct this project have been identified.*	Is the implication that VCWWD-1 will bear the full costs of this $4,000,000 (CAPEX) project? The funding element is not discussed. Will pumpers in the basin be expected to cover the CAPEX and OPEX costs since no outside funding sources have been identified?
TM-22	TMorgan	Technical	collaboration required	9	2.2.3.4	*…this project will require coordination between FCGMA and VCWWD-1.*	Coordination/collaboration needed from CDFW, RWQCB, and ACOE. Suggest adding these agencies to the sentence.
TM-23	TMorgan	Technical	possible interbasin impacts	9	2.2.3.4	*Implementation of this project is not anticipated to cause Undesirable Results…*	What is the impact to Pleasant Valley basin? Might this loss of water be perceived as a triggering event for Undesirable Result(s)? How will this be evaluated in the BOYS?
TM-24	TMorgan	Technical	language clarification	9	2.2.3.4	*…this project would aid in maintaining groundwater elevations above the minimum thresholds throughout the ELPMA.*	This sentence implies that GW levels are currently above the MTs without the project. Is this project needed to achieve MTs in ELPMA?
TM-25	TMorgan	Technical	project water balance	10	2.2.4	*…groundwater flow modeling study suggests that pumping 6,270 AFY for the desalter project would result in an additional 2,200 AFY of recharge to the ELPMA.*	2,200AFY of enhanced surface water recharge is partiallly offset by the exported brine ~1,568AFY (assumed 25% of 6,270AFY) = 632AFY. The net benefit appears to be much less that 2,200 AFY of additional recharge.
TM-26	TMorgan	Technical	project benefits	10	2.2.4.1	*… it is estimated that this project would increase the sustainable yield of the ELPMA by 2,200 AFY.*	This is not clear to the reader. Pumping 6,270 AFY equates to an increase in the sustainable yield by 2,200 AFY?
TM-27	TMorgan	Technical	project assumption	10	2.2.4.2	*"This project is not dependent on other unbuilt projects or projects that are currently under construction."*	The SMP does not extend to desalter location. This project is dependent on an SMP extension to the desalter location (or some other brine disposal option).
TM-28	TMorgan	Technical	project assumption	10	2.2.4.2	*VCWWD-1 has not completed a feasibility study for this project.*	This language is not consistent with 2.2.4 and 2.2.4.1 that references preliminary GW modeling and preliminary analyses…have been completed…

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

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

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

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

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

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

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

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MEMORANDUM

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

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

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

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

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

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

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

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

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

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

Watermaster also requested specific commentary on:

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

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

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

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

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

June 25, 2025

Board of Directors
Fox Canyon Groundwater Management Agency
800 South Victoria Avenue
Ventura, CA 93009-1600

SUBJECT: Approve and Authorize the Interim Executive Officer to Execute a Professional Services Contract Modification with Dudek to Prepare the Las Posas Valley Basin 2025 Optimization Yield Study – *(Returning Item)*

RECOMMENDATIONS: (1) Receive a presentation from Agency Staff; and **(2)** Approve and authorize the Interim Executive Officer to execute a professional services contract modification with Dudek for the development of the 2025 Basin Optimization Yield (BOY) Study for the Las Posas Valley Basin (LPVB).

BACKGROUND:
The Las Posas Adjudication Judgment (Judgment) requires that Watermaster shall, with Committee Consultation, prepare a Basin Optimization Yield Study which determines the Operating Yield for the Las Posas Valley Basin. This will be established for each Water Year for the period Water Year 2025 through Water Year 2029 (Judgment § 4.10). The 2025 Basin Optimization Yield (BOY) will establish the Rampdown Rate for the period from Water Year 2025 through Water Year 2039, subject to modification as a result of the subsequent Basin Optimization Yield Study to be performed in 2030 and again in 2035 (Judgment § 4.10.1.4).

On October 23rd, 2024, following Committee Consultation, Watermaster executed a professional services contract with Dudek to prepare the BOY Study. The original contract consisted of 7 tasks which included performing modeling for East Las Posas and coordinating modeling with United Water Conservation District (UWCD) for West Last Posas. The approved contract has a total cost of $212,500.00. The currently approved contract tasks are:

1) Model Scenario Development
2) East Las Posas Management Area (ELPMA) Numerical Modeling
3) West Las Posas Management Area (WLPMA) Modeling Coordination
4) Draft and Final Basin Optimization Yield Study Report
5) Watermaster Response Reports
6) Committee Meetings
7) Project Management and Coordination

DISCUSSION:
As previously explained to your Board, UWCD has been unable to contract with Watermaster to perform the West Las Posas modeling for the BOY Study. Watermaster staff, in consultation with Dudek, have provided several alternatives to complete the modeling and BOY Study in a reasonable timeframe. These alternatives, and their respective impacts to the BOY schedule were forwarded to the Policy Advisory Committee (PAC) and the Technical Advisory Committee (TAC) for consultation on December 23, 2024, and an updated and revised version on April 3rd, 2025. Watermaster requested consultation on the following topics:

1) Should the Watermaster use the UWCD Periodic Evaluation model files to run scenarios for preparation of the Basin Optimization Yield Study rather than estimating the Basin Optimization Yield and Rampdown (i) using GSP periodic evaluation model simulations or (ii) using historical groundwater elevation measurements and extraction reports?
2) Is the schedule to implement the alternative in (1) and complete the Basin Optimization Yield Study in April 2026 for adoption at the May 2026 Watermaster Board of Directors meeting, approximately four months before the start of Water Year 2026 (October 1, 2026, through September 30, 2027), a reasonable alternative for timely completion of the Basin Optimization Yield Study?

Watermaster and consultant's (Dudek) preferred alternative path forward is to use the same model files most recently used for the 5-Year Periodic Evaluation of the Groundwater Sustainability Plan and perform the analysis needed to complete the BOY Study. The PAC and TAC considered this consultation request at their April 17th and April 15th, 2025, meetings. Both PAC and TAC agreed that Watermaster's preferred approach is the most favorable option but also expressed some concerns.

The PAC recommended exploring the cost and schedule impacts of upgrading the model to address several concerns. This includes refining understanding of the Somis fault boundary, performing recalibration, validation, sensitivity and uncertainty analysis of the model, and extending the modeling period to 2024.

The TAC expressed similar concerns about the Somis fault boundary and recommended Watermaster and Dudek evaluate the impacts of this boundary on the BOY Study. TAC recommended Watermaster clarify what criteria will be used to assess undesirable results when comparing modeled scenarios. Finally, TAC also recommended preemptively considering what information could be shared with the TAC and public from the model files.

Watermaster staff and Dudek have been working diligently to address the concerns of the PAC and TAC, while also making reasonable progress to complete the BOY Study (Exhibit 12 B and Exhibit 12C). This work includes assessing impacts on the Somis fault boundary by comparing previous model runs from the original 2020 GSP, with most recent runs for the 5-Year Periodic Evaluations. To continue progression with this work and finalize the modeling, a contract modification with Dudek is necessary to extend the contract to June 30th of 2026 and add two additional tasks:

Task 8: West Las Posas Management Area (WLMPA) Modeling
Task 9: Response to Data Requests

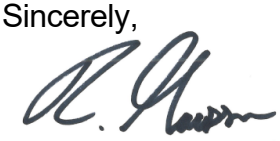
Task 8 involves all work necessary to prepare, analyze and run up to five (5) model scenarios for the WLMPA, using UWCD's Updated Coastal Plain Model. This includes running a baseline scenario, a projects scenario, and up to three (3) alternative pumping scenarios. If the basin optimization yield (the sustainable yield in 2040) is less than 40,000 acre feet, then the three (3) alternative pumping scenarios will be used to calculate the ramp down rate.

Task 9 is dedicated to responding to data requests from the TAC. This item was specifically requested during TAC consultation on a recommendation report dated October 4th, 2024. Task 9 provides 40 hours as needed to fulfill such requests.

The total contract cost increase for the addition of Task 8 and 9 is a total of $90,500.00, for a total contract cost of $303,000.00 (see Exhibit 12A).

CONCLUSION:
Staff recommends you approve and authorize the Interim Executive Officer to execute a Professional Services Contract Modification with Dudek to prepare the Las Posas Valley Basin 2025 Optimization Yield Study for a total cost increase of $90,500.00. This letter has been reviewed by Agency Counsel. If you have any questions, please call me at (805) 654-3952

Sincerely,



Robert Hampson
Hydrologist

Attachments:

Exhibit 12A – Contract Amendment to Prepare the 2025 Las Posas Valley Basin Optimization Yield Study
Exhibit 12B – Watermaster Response Report to PAC, June 09, 2025
Exhibit 12C – Watermaster Response Report to TAC, June 09, 2025

MODIFICATION NUMBER 1 TO 10/23/2024 CONTRACT

Contract Title: **Professional Services Contract Between the Fox Canyon Groundwater Management Agency and Dudek, for Professional Consulting Services to Prepare the Las Posas Basin 2025 Basin Optimization Yield Study.**

This modification ("MODIFICATION NO. 1") is made and entered into by and between the **Fox Canyon Groundwater Management Agency** hereinafter referred to as AGENCY, and **DUDEK**, hereinafter referred to as CONSULTANT.

WHEREAS, there now exists a binding contract between AGENCY and CONSULTANT originally dated 10/23/2024 for the CONSULTANT to provide Professional Consulting Services Related to Preparing the Las Posas Valley Basin 2025 Basin Optimization Yield Study for a total contract amount of $212,500 and a contract completion date of 10/10/2025 ("CONTRACT"); and

WHEREAS it has become necessary to modify the contract to provide Professional Services to prepare, run, and analyze model simulations for the West Las Posas Management Area (WLPMA) using the United Water Conservation District (UWCD) Updated Coastal Plain Model, and to respond to data requests submitted by the Las Posas Valley Basin Technical Advisory Committee (TAC) on an as-needed basis (Exhibit A – Scope of Work), and modify the fees (Exhibit C – Fees and Payments); and

WHEREAS, AGENCY and CONSULTANT desire to modify the terms of said existing CONTRACT; NOW THEREFORE, the parties hereto agree as follows:

1. All provisions of the original contract dated 10/23/2024, shall remain in full force and effect unless expressly modified by this modification.
2. Exhibit A (Scope of Work and Services) shall be modified as follows:

   See attached revised Exhibit A.
3. Exhibit B (Time Schedule) shall be modified as follows:

   See attached revised Exhibit B.
4. Exhibit C (Fees and Payment) shall be modified as follows:

   See attached revised Exhibit C.

   Agency shall pay consultant for the said work at the rates provided in Exhibit C. The maximum fee shall be increased by $90,500.00 (Memorandum dated 03/31/2025) for said work.
5. The total contract amount is hereby increased by **$90,500.00** for a new contract total amount of **$303,000.00.**

Contract Title: PROFESSIONAL SERVICES CONTRACT BETWEEN THE FOX CANYON GROUNDWATER MANAGEMENT AGENCY AND DUDEK, FOR PROFESSIONAL CONSULTING SERVICES TO PREPARE THE LAS POSAS BASIN 2025 BASIN OPTIMIZATION YIELD STUDY

IN WITNESS WHEREOF, THE PARTIES HERETO HAVE EXECUTED THIS MODIFICATION.

CONSULTANT: **DUDEK**	**AGENCY:** **Fox Canyon Groundwater Management Agency**
Signature	Signature
Print Name and Title	Jeff Palmer, Interim Executive Officer Print Name and Title

MODIFICATION No. 1
(Bold, Italic, Underline)

PROFESSIONAL SERVICES CONTRACT
BETWEEN DUDEK AND FCGMA
[OCTOBER 23, 2024]
EXHIBITS

EXHIBIT A - SCOPE OF WORK AND SERVICES

PROFESSIONAL SERVICES CONTRACT BETWEEN THE FOX CANYON GROUNDWATER MANAGEMENT AGENCY AND DUDEK FOR PROFESSIONAL CONSULTING SERVICES TO PREPARE THE LAS POSAS BASIN 2025 BASIN OPTIMIZATION YIELD STUDY

1. Overview of Project and Services

The AGENCY has engaged CONSULTANT to provide professional consulting services to aid AGENCY in preparing the Las Posas Valley Basin 2025 Basin Optimization Yield Study.

2. Scope of Services

CONSULTANT shall provide the following services and work to AGENCY as detailed in CONSULTANT's October 10, 2024, proposal:

Additional scope in this June 25, 2025, Contract Modification No. 1 is identified with bold, italic, and underlined text.

Task 1 - Model Scenario Development

The LPV Judgment requires development of a Basin Optimization Plan that defines the suite of 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" (Section 5.3.2.2 of the Judgment). The Judgment requires that FCGMA prepare an initial draft of the Basin Optimization Plan that will include project details (e.g. schedules, costs, feasibility, etc.), a project prioritization schedule, and a schedule for the Basin Optimization Projects to be evaluated, scoped, designed, financed, and developed (Section 5.3.2.4 and 5.3.2.5 of the Judgment). The Basin Optimization Plan has not been adopted by the Watermaster Board. To facilitate efficient development of the BOY Study, CONSULTANT will use the project feasibility and implementation timelines in the draft Basin Optimization Plan to prepare a proposed suite of projects for inclusion in the BOY Study. As needed and appropriate, CONSULTANT will coordinate with FCGMA and individual project proponents to define the project implementation details required for modeling, such as proposed in lieu and recycled water delivery recipients, conditions amenable to stormwater diversion along the Arroyo Las Posas, and timelines/conditions favorable for using Calleguas facilities for LPVB replenishment.

- The model scenario will only include projects identified in the draft Basin Optimization Plan that are "practical, reasonable, and cost-effective to implement prior to 2040".

- Prior to performing any modeling simulations, CONSULTANT will present the proposed model scenarios and BOY Study project suite at one Las Posas Valley Technical Advisory Committee (TAC) meeting.
- TAC recommendations on alterations to the model scenarios will be requested in a written recommendation report to be submitted to the Watermaster within 14 days of the CONSULTANT presentation at the TAC meeting.
- After completing the modeling for Baseline and Projects scenarios, CONSULTANT will discuss the model results, proposed methods for developing alternative pumping scenarios, and proposed methods for estimating the Basin Optimization Yield using the numerical model results at one TAC meeting.
- TAC recommendations on the model results, proposed methods for developing alternative pumping scenarios, and proposed methods for estimating the Basin Optimization Yield will be requested in a written recommendation report to be submitted to the Watermaster within 14 days of the CONSULTANT presentation at the TAC meeting.
- The costs associated with TAC consultation are accounted for in Task 6, Committee Meetings.
- If individual project proponents do not respond to a request for additional information on project implementation details CONSULTANT will use professional judgment to develop the project scenario.

Deliverables:

- Matrix, in either Microsoft Excel or PDF form, that relates the proposed model scenarios, proposed Basin Optimization Projects considered for the numerical modeling, and the party responsible to conduct the Project modeling (i.e., CONSULTANT or United Water Conservation District).

Task 2 – East Las Posas Management Area (ELPMA) Numerical Modeling

Subtask 2.1 – Baseline Scenario

Following development of the BOY Study project suite, CONSULTANT will develop a baseline scenario that simulates groundwater conditions in the ELPMA through water year 2069. To remain consistent with the GSP, the baseline scenario will use the hydrologic period from 1930-1979, modified by DWR's 2070 central tendency climate change factors. Groundwater withdrawals in the baseline model scenario will be set equal to the allocations in the Groundwater Allocation Schedule prepared in accordance with the Water Rights Holders in the ELPMA. The baseline model scenario will not include projects identified in the Basin Optimization Plan. Using the simulation results from the baseline scenario, CONSULTANT will develop groundwater budgets, calculate the change in groundwater in storage, and compare groundwater levels at key wells to the

minimum thresholds and measurable objectives in the ELPMA to characterize future groundwater conditions in the absence of implementing new projects.

- The Baseline scenario will be modeled using the existing version of the numerical groundwater flow model of the ELPMA (CMWD 2018). This model is currently being used for development of the 2025 LPVB GSP Update.
- Baseline modeling will not include model validation, re-calibration, or uncertainty quantification.
- Well by well extraction rates will be defined using the allocations in the Groundwater Allocation schedule prepared in accordance with the Water Rights Holders in the ELPMA.
- CONSULTANT will present the completed modeling results for both the Baseline and Projects scenarios at one TAC meeting.
- TAC recommendations on the completed model results for the Baseline and Projects scenarios will be requested in a written recommendation report to be submitted to the Watermaster within 14 days of the CONSULTANT presentation at the TAC meeting.
- The costs associated with TAC consultation are accounted for in Task 6, Committee Meetings.

Deliverables:

- Baseline scenario input and output files.
- Tabulated monthly and annual groundwater budgets for the ELPMA and Epworth Gravels Management Area.
- Simulated groundwater elevation hydrographs for all key wells in the ELPMA and Epworth Gravels Management Area, provided in Microsoft Excel format.

Subtask 2.2 – Projects Scenario

Following completion of the Baseline model scenario, CONSULTANT will develop a Projects scenario that integrates Basin Optimization Projects that are “practical, reasonable, and cost-effective to implement prior to 2040” and identified in the draft Basin Optimization Plan. CONSULTANT will simulate operation of the Basin Optimization Projects according to the schedules and scales defined in the draft Basin Optimization Plan. To evaluate the benefits of implementing basin optimization projects, the Projects model scenario will use the same hydrology and groundwater pumping as the Baseline model scenario. Using the simulation results from the Projects scenario, CONSULTANT will develop groundwater budgets, calculate the change in groundwater in storage, and compare groundwater levels at key wells to the minimum thresholds and measurable objectives in the ELPMA to characterize future groundwater conditions. CONSULTANT

will compare these model results to the Baseline scenario results to provide a quantitative estimate of Basin Optimization Project benefits.

- The Project Model Scenario will be modeled using the existing version of the numerical groundwater flow model of the ELPMA (CMWD 2018). This model is currently being used for development of the 2025 LPVB GSP Periodic Evaluation.
- Baseline modeling will not include model validation, re-calibration, or uncertainty quantification.
- Well by well extraction rates will be defined using the allocations in the Groundwater Allocation Schedule prepared in accordance with the Water Rights Holders in the ELPMA.
- CONSULTANT will present the completed modeling results for both the Baseline and Projects scenarios at one TAC meeting.
- TAC recommendations on the completed model results for the Baseline and Projects scenarios will be requested in a written recommendation report to be submitted to the Watermaster within 14 days of the CONSULTANT presentation at the TAC meeting.
- The costs associated with TAC consultation are accounted for in Task 6, Committee Meetings.

Deliverables:

- Projects scenario input and output files.
- Tabulated monthly and annual groundwater budgets for the ELPMA and Epworth Gravels Management Area.
- Simulated groundwater elevation hydrographs for all key wells in the ELPMA and Epworth Gravels Management Area, provided in Microsoft Excel format.

Subtask 2.3 – Alternative Pumping Scenarios and Rampdown Rate

If the Basin Optimization Projects do not avoid undesirable results in the ELPMA, CONSULTANT will perform up to three (3) additional scenarios to define a groundwater production rate that avoids undesirable results. For these scenarios, CONSULTANT will uniformly reduce groundwater extractions across the ELPMA until undesirable results are avoided. These model runs will incorporate the same Basin Optimization Projects as the Projects scenario. CONSULTANT has not included scope and budget to simulate localized restrictions on extractions within the ELPMA, as defined in section 4.10.3 of the Judgment. If the BOY is lower than 40,000 AFY, CONSULTANT will calculate the Rampdown Rate in accordance with Section 4.10.1.4 of the Judgment.

Assumptions:

- The alternative pumping scenarios will be modeled using the existing version of the numerical

groundwater flow model of the ELPMA (CMWD 2018). This model is currently being used for development of the 2025 LPVB GSP Periodic Evaluation. The alternative pumping scenarios modeling will not include model validation, re-calibration, or uncertainty quantification.

- Well by well extraction rates will be defined using the allocation schedule set forth in Exhibit C and the Protocols and Formulas to Determine Allocations in Exhibit D of the Judgment.
- Alternative pumping scenarios will not include localized restrictions on extractions within the ELPMA.
- Results from the alternative pumping scenarios will not undergo PAC and/or TAC review until committee review of the draft BOY Study.

Deliverables:

- Alternative Pumping scenario input and output files.
- Tabulated monthly and annual groundwater budgets for the ELPMA and Epworth Gravels Management Area.
- Simulated groundwater elevation hydrographs for all key wells in the ELPMA and Epworth Gravels Management Area, provided in Microsoft Excel format.
- Spreadsheet(s) documenting Rampdown Rate calculations.

Task 3 – WLPMA Modeling Coordination

This task consists of scope and budget to attend up to five (5) coordination calls, develop up to five (5) pumping scenarios, and analyze up to five (5) sets of numerical model outputs provided by UWCD for incorporation into the BOY Study.

- All numerical modeling for the WLPMA will be performed by UWCD using the same version of the Ventura Regional Groundwater Flow Model that is being used to support preparation of the 2025 GSP Updates for the Oxnard Subbasin, Pleasant Valley Basin, and LPVB.
- The WLPMA modeling will not include model validation, re-calibration, or uncertainty quantification.
- Well by well extraction rates will be defined using the allocation schedule set forth in Exhibit C and the Protocols and Formulas to Determine Allocations in Exhibit D of the Judgment in accordance with the Water Rights Holders in the WLPMA.
- Alternative pumping scenarios will not include localized restrictions on extractions within the WLPMA.

Deliverables:

- Attendance at coordination calls.
- Meeting summaries / notes from coordination calls.

- Excel spreadsheets with summary analyses based on UWCD numerical model results.
- Simulated groundwater elevation hydrographs for all key wells in the WLPMA.
- Spreadsheet(s) documenting Rampdown Rate calculations.

Task 4 – Draft and Final Basin Optimization Yield Study

CONSULTANT will summarize results from the numerical modeling in the draft BOY Study. CONSULTANT will prepare one (1) draft BOY Study and, pursuant to the Judgment, provide the draft to the PAC and TAC for review and comment. CONSULTANT will, as appropriate and in consultation with FCGMA, revise the draft BOY Study based on feedback from the PAC and TAC. The revised draft BOY Study will be provided to the Watermaster Board for review and discussion. CONSULTANT will prepare the final BOY Study based on feedback provided by the Watermaster Board and will submit a final BOY Study for approval by Watermaster Board meeting.

- CONSULTANT will provide electronic copies of the draft BOY Study to the PAC and TAC.
- The draft BOY Study will undergo one (1) round of internal review by FCGMA staff, one (1) round of external review by the LPVB PAC and TAC, and one (1) round of external review by Watermaster Board.
- The PAC will provide one (1) redline edit version of the draft BOY study with all PAC member comments collected for CONSULTANT to review.
- The TAC will provide one (1) redline edit version of the draft BOY study with all TAC member comments collected for CONSULTANT to review.

Deliverables:

- One (1) draft BOY study for internal review by FCGMA staff. One (1) redlined version of the draft BOY study documenting revisions based on FCGMA staff comments.
- One (1) draft BOY study for external TAC and PAC review. One (1) redlined version of the draft BOY study documenting revisions based on TAC and PAC comments.
- One (1) draft BOY study for external review by Watermaster Board. One (1) redlined version of the draft BOY study documenting revisions, as necessary, based on Watermaster Board comments.
- One (1) final BOY study for adoption by Watermaster Board.

Task 5 – Watermaster Recommendation Response Report

The Judgment requires that the draft BOY Study scope of work and draft BOY Study be provided to the PAC and TAC for formal review and comment.

The PAC and TAC may provide the Watermaster with recommendation reports for both the BOY Study scope of work and BOY Study that shall be presented to the Watermaster Board.

Prior to presenting the recommendations to the Board, Watermaster staff may prepare formal response reports that document responses to the PAC and TAC recommendations. CONSULTANT has included time and budget to support the Watermaster staff in the development of response reports for both the draft scope of work and BOY Study.

The time and budget provided is based on CONSULTANT's professional judgment. If PAC and TAC comments vary greatly from our estimate, we will discuss options for addressing these comments with FCGMA staff. If CONSULTANT and staff agree that the time budgeted below is insufficient to address the comments, CONSULTANT will prepare a revised budget for Watermaster approval detailing the additional work required to adequately respond to the comments.

Assumptions:
CONSULTANT will prepare one (1) draft response report for the BOY study scope of work recommendation report and one (1) draft response report for the BOY Study recommendation report. Each draft response report will be provided to FCGMA for one (1) round of internal review.

- CONSULTANT will, as appropriate and in consultation with FCGMA staff, revise the draft response reports and provide the Watermaster with one (1) electronic copy for consideration during review of the BOY Study scope of work and BOY Study report

Deliverables:

- One (1) draft response report for the BOY study scope of work recommendation report and one (1) draft response report for the BOY Study recommendation report for internal review by FCGMA staff. One (1) redlined version of each response report documenting revisions based on FCGMA staff comments.
- One (1) final response report, in electronic form, for the BOY Study scope of Work and one (1) final response report, in electronic form, for the BOY Study recommendation report.

Task 6 – Committee Meetings

The Judgment requires that the BOY Study be developed in consultation with the PAC and TAC and approved by the Watermaster Board. To support these coordination efforts, CONSULTANT has included time to prepare for and attend both in-person and virtual meetings to discuss the development of the BOY Study with the TAC and Watermaster Board. Under this task CONSULTANT will prepare for and attend up to seven (7) meetings according to the following schedule:

Meeting No.	Committee	Type
1	Review of Baseline and Projects modeling assumptions	Technical Advisory Committee
2	Review of Modeling Approach and Discussion of Recommendation Reports	Watermaster Board
3	Review of Baseline and Projects modeling results and assumptions for alternative pumping scenarios	Technical Advisory Committee
4	Draft Study	Watermaster Board
5	Recommendations on the Draft Study	Technical Advisory Committee
6	Recommendations on the Draft Study	Watermaster Board
7	Adoption of the BOY Study	Watermaster Board

Deliverables:

- Attendance at TAC and Board Meetings.
- Presentation materials for each TAC and Board Meeting attended.

Task 7 – Project Management

The BOY Study will be developed over a 10-month time frame (Exhibit B). To facilitate efficient development of the BOY Study, CONSULTANT has included scope and budget for biweekly (every other week) coordination calls with FCGMA staff, and general project management activities.

Deliverables:

- Draft agendas delivered prior to each coordination call.
- Attendance at coordination calls.

- Monthly status reports and invoices.

Task 8 – WLPMA Modeling

CONSULTANT will prepare, run, and analyze up to five (5) model simulations for the West Las Posas Management Area (WLPMA) using the United Water Conservation District (UWCD) Updated Coastal Plain Model, which is the same numerical groundwater flow model used to support development of the 2025 Periodic Evaluation of the LPVB GSP. The Updated Coastal Plain Model is UWCD's current flow model that covers the entirety of the Oxnard Subbasin, Pleasant Valley Basin, and WLPMA.

CONSULTANT assumes that the five model simulations will use the Updated Coastal Plain Model input files prepared by UWCD for the 2025 LPVB GSP Periodic Evaluation and that the numerical groundwater flow modeling conducted for the BOY Study will not require updating or revising the surface water, imported water, or recycled water supplies in the Oxnard Subbasin and Pleasant Valley Basin. Revisions to these parameters would require use of UWCD's Surface Water Distribution Model to update the representation of conjunctive use and groundwater pumping within the Oxnard Subbasin and Pleasant Valley Basin. UWCD's Surface Water Distribution Model is not publicly available. Additionally, CONSULTANT assumes that the numerical groundwater flow modeling conducted for the BOY Study will not include: (i) updating and/or revising model boundary conditions in the WLPMA, or (ii) model recalibration.

The five groundwater model simulations, and underlying assumptions, are described in the subtasks below.

Subtask 8.1 – Baseline Scenario
CONSULTANT will develop a baseline scenario that simulates groundwater conditions in the WLPMA through water year 2069. To remain consistent with the Periodic Evaluation of the GSP, the baseline scenario will use the hydrologic period from 1930-1979, modified by DWR's 2070 central tendency climate change factors. Groundwater withdrawals in the baseline model scenario will be set equal to the allocations in the Groundwater Allocation Schedule prepared in accordance with the Water Rights Holders in the WLPMA. The baseline model scenario will not include projects identified in the Basin Optimization Plan.

Using the simulation results from the baseline scenario, CONSULTANT will develop groundwater budgets, calculate the change in groundwater in storage, and

compare groundwater levels at key wells to the minimum thresholds and measurable objectives in the WLPMA to characterize future groundwater conditions in the absence of implementing new projects.

Assumptions

- ***CONSULTANT will use the UWCD-provided input files from the 2025 Periodic Evaluation Future Baseline Scenario as the basis for the baseline scenario model run for the BOY Study.***
    - ***Baseline modeling will not include model validation, re-calibration, or uncertainty quantification.***
    - ***Baseline modeling will not include any revisions or updates to groundwater pumping, surface water availability, or recycled water availability in the Oxnard Subbasin or the Pleasant Valley Basin.***
    - ***Baseline modeling will not include any revisions to the design or structure of the Updated Coastal Plain Model.***
- ***Well by well extraction rates will be defined using the allocations in the Groundwater Allocation Schedule prepared in accordance with the Water Rights Holders in the WLPMA.***
- ***CONSULTANT will present the completed modeling results for both the baseline and projects (see Subtask 8.2) scenarios at one TAC meeting.***
- ***TAC recommendations on the completed model results for the baseline and projects scenarios will be documented in a written recommendation report to be submitted to the Watermaster within 14 days of the CONSULTANT presentation at the TAC meeting.***
- ***The costs associated with TAC consultation are accounted for in Task 6, Committee Meetings.***

Subtask 8.2 – Projects Scenario
Following completion of the baseline model scenario, CONSULTANT will develop a projects scenario that integrates Basin Optimization Projects that are "practical, reasonable, and cost-effective to implement prior to 2040" and identified in the Draft Basin Optimization Plan. CONSULTANT will simulate operation of the Basin Optimization Projects according to the schedules and scales defined in the Draft Basin Optimization Plan.

To evaluate the benefits of implementing basin optimization projects, the projects scenario will use the same hydrology and groundwater pumping as the baseline scenario. Using the simulation results from the projects scenario, CONSULTANT will develop groundwater budgets, calculate the change in groundwater in storage, and compare groundwater levels at key wells to the minimum thresholds and

measurable objectives in the WLPMA to characterize future groundwater conditions. CONSULTANT will compare these model results to the baseline scenario results to provide a quantitative estimate of Basin Optimization Project benefits.

Assumptions

- ***The projects scenario will be modeled using the UWCD's Updated Coastal Plain Model.***
    - ***Projects scenario modeling will not include model validation, re-calibration, or uncertainty quantification.***
    - ***Projects scenario modeling will not include any revisions or updates to groundwater pumping, surface water availability, or recycled water availability in the Oxnard Subbasin and Pleasant Valley Basin.***
    - ***Projects scenario modeling will not include any revisions to the design or structure of the Updated Coastal Plain Model***
- ***Well by well extraction rates will be defined using the allocations in the Groundwater Allocation Schedule prepared in accordance with the Water Rights Holders in the WLPMA.***
- ***CONSULTANT will present the completed modeling results for both the Baseline and Projects scenarios at one TAC meeting.***
- ***TAC recommendations on the completed model results for the baseline and projects scenarios will be requested in a written recommendation report to be submitted to the Watermaster within 14 days of the CONSULTANT presentation at the TAC meeting.***
- ***The costs associated with TAC consultation are accounted for in Task 6, Committee Meetings.***

Subtask 8.3 – Alternative Pumping Scenarios and Rampdown Rate
If the Basin Optimization Projects do not avoid undesirable results in the WLPMA, CONSULTANT will perform up to three (3) additional scenarios to define a groundwater production rate that avoids undesirable results, as defined in the GSP for the LPVB. For these scenarios, CONSULTANT will uniformly reduce groundwater extractions across the WLPMA until undesirable results are avoided. These model runs will incorporate the same Basin Optimization Projects as the Projects scenario. CONSULTANT has not included scope and budget to simulate localized restrictions on extractions within the WLPMA, as defined in section 4.10.3 of the Judgment.

If the BOY is lower than 40,000 AFY, CONSULTANT will calculate the Rampdown Rate in accordance with Section 4.10.1.4 of the Judgment.

Assumptions

- ***The Alternative Pumping scenario will be modeled using UWCD's Updated Coastal Plain Model.***
  - ***Alternative Pumping scenario modeling will not include model validation, re-calibration, or uncertainty quantification.***
  - ***Alternative Pumping scenario modeling will not include any revisions or updates to groundwater pumping, surface water availability, or recycled water availability in the Oxnard Subbasin and Pleasant Valley Basin.***
  - ***Alternative Pumping scenario modeling will not include any revisions to the design or structure of the Updated Coastal Plain Model***
- ***Well by well extraction rates will be defined using the allocation schedule set forth in Exhibit C and the Protocols and Formulas to Determine Allocations in Exhibit D of the Judgment.***
- ***Alternative pumping scenarios will not include localized restrictions on extractions within the WLPMA.***
- ***Results from the alternative pumping scenarios will not undergo PAC and/or TAC review until committee review of the draft BOY Study.***

Task 9 – Response to Data Requests

In their October 4, 2024, Recommendation Report submitted to the Watermaster, the LPVB TAC recommended that CONSULTANT include 40 hours of time to respond to TAC data requests. Task 9 is designed to cover the preparation of modeling input and output materials including, but not limited to, water budgets, groundwater flow summaries, and simulated groundwater elevations. Per the TAC's recommendation, time billed towards this task will occur on an as-needed basis, at the request of the LPVB TAC and with direction from FCGMA staff.

[End of Exhibit A]

EXHIBIT B - TIME SCHEDULE

PROFESSIONAL SERVICES CONTRACT BETWEEN THE FOX CANYON GROUNDWATER MANAGEMENT AGENCY AND DUDEK FOR PROFESSIONAL CONSULTING SERVICES TO PREPARE THE LAS POSAS BASIN 2025 BASIN OPTIMIZATION YIELD STUDY

1. Schedule

Notwithstanding Section 2 (Term) of the Contract, all Work to be performed by CONSULTANT on this Contract shall be completed ***by June 30, 2026.***

CONSULTANT shall complete tasks as follows:

Updated Task Schedule

Description	***Original Schedule Date***	***Revised Schedule Date***
Recommendation & Response Reports discussed by WM Board at special meeting.	2/14/2025	-
Task 2/8 - Numerical Modeling[1]		
Task 2.1/8.1 - Baseline Scenario	~~***2/25/2025***~~	***6/2/2025 (s)***
Task 2.2/8.2 - Projects Scenario	~~***3/25/2025***~~	***6/23/2025 (s)***
TAC review of Baseline and Projects	~~***4/1/2025***~~	***8/5/2025 (m)***
TAC Recommendation Report	~~***4/22/2025***~~	***8/26/2025 (d)***
Watermaster Response Report	~~***5/13/2025***~~	***9/16/2025 (d)***
Recommendation & Response Reports discussed by Board	~~***5/28/2025***~~	***9/24/2025 (m)***
Task 2.3/8.3 - Model Alternative Pumping Scenarios	~~***6/27/2025***~~	***10/25/2025 (d)***
Task 4 - Basin Optimization Yield Study		
Task 4.1 - Draft BOY Study	~~***8/11/2025***~~	***12/9/2025 (d)***
PAC & TAC Recommendation Reports	~~***10/10/2025***~~	***2/7/2026 (d)***

Watermaster Response Report & revised draft BOY Study	***~~10/31/2025~~***	***2/28/2026 (d)***
Recommendation & Response Reports discussed by Board; Board provides direction on revised draft BOY Study	***~~11/8/2025~~***	***3/25/2026 (m)***
Task 4.2 - Final BOY Study development following Watermaster Board review	***~~12/6/2025~~***	***4/22/2026 (d)***
Task 9 – Response to Data Requests	***-***	***As Needed Basis (40 Hours Total)***
Watermaster Board Approval of Final BOY Study	***~~12/12/2025~~***	***5/27/2026 (m)***

1) ***Task 3 and Task 8 are now part of Task 2 in the updated timeline since UWCD declined to conduct WLPMA modeling under contract with the Watermaster.***
2) ***'-' No need for revised schedule because the event has already occurred.***
3) ***Gray text dates can no longer be achieved under the delayed schedule.***
4) ***(s) Start date***
5) ***(d) Deliverable date***
6) ***(m) Meeting date***

- This schedule assumes that the modeling for the Basin Optimization Yield study will begin after the draft Basin Optimization Plan is complete. CONSULTANT anticipates that the draft Basin Optimization Plan will be completed by December 9, 2024, which would facilitate preparation of the draft Basin Optimization Yield study by June 2025. If the draft Basin Optimization Plan is not prepared in this timeframe, CONSULTANT will coordinate with FCGMA to prepare a revised schedule with committee consultation.
- Preparation of the complete draft Basin Optimization Plan assumes timely consultation and responses from project proponents.
- This schedule assumes that TAC will prepare recommendation reports for the Watermaster within fourteen (14) days of receiving presentation on: (i) the Model Scenario Development approach, and (ii) the results from the Baseline and Projects scenarios and approach for simulating Alternative Pumping scenarios.
- This schedule assumes that TAC and PAC will submit their respective recommendation report on the BOY Study to the Watermaster no later than August 11, 2025 (70 days after receiving the draft). If the response reports from TAC and PAC are received after August 11, 2025, CONSULTANT cannot guarantee that

the final BOY Study will be available by September 10, 2025, for incorporation into the Watermaster Board packet.

- This schedule additionally assumes that the numerical modeling performed by UWCD will be completed in coordination with FCGMA and CONSULTANT over a five (5) month time frame, with the Baseline and Projects Scenarios completed by 2/7/2025 and the Alternative Pumping Scenarios completed by 4/19/2025. CONSULTANT will work with FCGMA and UWCD to facilitate this. CONSULTANT does not assume any responsibility for delays to UWCD modeling deliverables resulting from changes in UWCD staffing needs and schedules.
- In the event that the numerical modeling cannot be performed within this time frame, CONSULTANT will coordinate with FCGMA to prepare a revised schedule with committee consultation.

Schedule Specifications Included in Contract Modification No. 1 Dated 06/13/2025

CONSULTANT anticipates that the BOY Study will be completed in accordance with the timeline specified above. This schedule assumes that the Watermaster Board will approve the revised scope and schedule at the regularly scheduled June 2025 meeting and that TAC and PAC will concur with CONSULTANT's recommended approach for conducting the numerical groundwater modeling of the WLPMA in the BOY Study. The above updated schedule is the same schedule that was presented to TAC and PAC in CONSULTANT's March 31 memo on the alternate approaches to conducting the BOY analyses in the WLPMA.

Assumptions:

- ***Approval of revised scope and schedule at the June 2025 Watermaster Board meeting.***
- ***Preparation of the complete draft Basin Optimization Yield Study assumes timely consultation and responses with the PAC and TAC.***
    - ***If TAC, PAC or Watermaster Board meeting deadlines specified in Table 2 are not met, schedule impacts of one month or greater may occur.***

Schedule Table

Description	Tasks Covered	Anticipated Duration (weeks)
Development of the draft BOY Study	1, 2, 3, 4	***45***

LPVB Committee review and Recommendation Report development	-	***60***
Response report development review by Watermaster Board	4, 5	***15***
Watermaster Board review of Draft BOY study, committee report(s), and response report(s)		***26***
Final BOY Study development following Watermaster Board review	4	***28***
Total Anticipated Project Duration		***66 weeks (15.20 months)***

2. Delays

If all work under this contract cannot be completed by the dates specified in Exhibit B through no fault of CONSULTANT, the fee for the work not then completed may be adjusted to reflect increases in cost which occur, due to delay, from the date that the work was required to be complete as specified in Exhibit B until the time the work can actually be completed. Any payments of additional fee as described in this paragraph must be authorized by AGENCY with a modification to this contract.

[End of Exhibit B]

EXHIBIT C – Fees and Payments
PROFESSIONAL SERVICES CONTRACT BETWEEN THE FOX CANYON GROUNDWATER MANAGEMENT AGENCY AND DUDEK FOR PROFESSIONAL CONSULTING SERVICES TO PREPARE THE LAS POSAS BASIN 2025 BASIN OPTIMIZATION YIELD STUDY

1. Compensation Summary

The following summarizes the maximum amount of compensation available to CONSULTANT under this contract. The actual amount of compensation shall be established and paid in accordance with the applicable provisions of the contract including this Exhibit C.

Previous Total Amount Not to Exceed:	$ 212,500.00
Maximum Fees for Basic Services:	***$ 303,000.00***
Total Amount Not to Exceed:	***$ 303.000.00***

2. Fees for Basic Services

MODIFICATION NO. 1
(Bold, Italic, Underline)

PROFESSIONAL SERVICES CONTRACT
BETWEEN DUDEK AND FCGMA
[OCTOBER 23, 2024]
EXHIBITS

AGENCY agrees to pay CONSULTANT the following fees for the performance of Basic Services

☒An **hourly rate** compensation, for actual hours of Basic Services performed that is based upon the hourly rates set forth in the following rate schedule, which rates shall remain fixed for the duration of the contract, not to exceed the ***maximum fee amount of the Contract of $303,000.00.*** The maximum fees for the respective tasks identified in Exhibit A as well as the total maximum fee amount are shown in the below table. In no case shall a fee for a specific task exceed that listed below without prior written approval by the AGENCY.

Rates to be charged are identified in the Rate Table listed below.

Rate Table

Item	Position/Equipment	Unit	Rate
1	Principal Hydrogeologist III / Eng. III – Jill Weinberger	Hr.	$320
2	Senior Hydrogeologist V / Eng. V	Hr.	$275
3	Senior Hydrogeologist II/ Eng. II – Laura Minuto	Hr.	$245
4	Project Hydrogeologist III / Eng. III – Sharllyn Pimentel	Hr.	$205
5	Project Hydrogeologist II / Eng. II – Samira Ismaili	Hr.	$195

CONSULTANT may integrate additional staff into this project, with prior approval from FCGMA. The billing rates for those staff will be based on the 2024 Schedule of Charges included in the October 10, 2024, proposal submitted to FCGMA. Inclusion of additional staff will not change the not-to-exceed contract amount of ***$303,000.00***.

Task Table

Task	**Description**	**Maximum Fee**
1	Model Scenario Development	$7,555
2.1	Baseline Model Scenario	$20,020
2.2	Projects Model Scenario	$21,400
2.3	Alternative Pumping Model Scenario	$13,590
3	WLPMA Modeling Coordination	$14,420
4	Draft and Final Basin Optimization Yield Study Report	$43,320
5	Watermaster Response Reports	$34,950
6	Committee Meetings	$33,715
7	Project Management and Coordination	$23,530

8	***WLPMA Modeling***	
8.1	***Baseline Model Scenario***	***$31,020.00***
8.2	***Projects Scenario***	***$19,660.00***
8.3	***Alternative Pumping Scenarios and Rampdown Rate***	***$31,020.00***
9	***Response to Data Requests***	***$8,800.00***
	Total Fees:	***$303,000.00***

Total Fee Increase Associated With 06/13/2025 Contract Modification:$90,500.00

4. Delays

If Work cannot be completed by the dates specified in Exhibit B through no fault of CONSULTANT, the fees for the Work not then completed may be adjusted to reflect increases in cost which occur, due to delay, from the date that the Work was required to be complete as specified in Exhibit B until the time the Work can actually be completed. Any payments of such additional fees must be authorized by AGENCY with a written modification to this contract.

5. Payment

Pursuant to Section 4 of the Contract, AGENCY shall make payments to CONSULTANT as follows:

Requests for Payment

Each request for payment shall include: (i) personnel time records for Basic Services at the rates specified in this Exhibit C if applicable; (ii) receipts for all authorized reimbursable expense, along with the written AGENCY authorization for any specific reimbursable expenses requested for payment if required above.

CONSULTANT shall submit all requests for payment to:

Fox Canyon Groundwater Management Agency
800 South Victoria Avenue, L#1610
Ventura, CA 93009-1670
FCGMA@ventura.org

Payment Schedule

Payments shall be made monthly by AGENCY upon presentation of a properly completed AGENCY claim form that has been approved by AGENCY.

Timely Invoicing

Timely invoicing by CONSULTANT is required. Delays in invoicing for services performed increases the management effort required by AGENCY to ensure accurate payments to CONSULTANT and manage project budgets. Accordingly, CONSULTANT shall request payment for services no later than 30 calendar days after the date that the services were performed.

CONSULTANT shall submit a final invoice within 30 days of the earliest of the following events: 1) completion and acceptance by AGENCY of all Work required by the contract; or 2) termination of the contract.

[End of Exhibit C]

DRAFT LAS POSAS VALLEY WATERMASTER RESPONSE REPORT

Date: June 9, 2025

To: Las Posas Valley Watermaster Board of Directors

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

Re: Response Report to PAC Consultation Recommendation Report, BOYS Preferred Modeling Alternative and Impacts to Schedule

In a March 31, 2025, memo, the Las Posas Valley Watermaster (Watermaster) consultant outlined three potential approaches to calculating the Basin Optimization Yield (BOY) and described the anticipated schedule impacts for each approach. Of the three approaches outlined in the March 31 memo, Watermaster's consultant recommended calculation of the BOY using the United Water Conservation District (UWCD) model files developed for the Periodic Evaluation of the Groundwater Sustainability Plan for the Las Posas Valley Basin (Periodic Evaluation). Under the schedule proposed in the memo, the development of the Draft BOY Study is anticipated to be completed by December 2025 and the final BOY Study is anticipated to be completed by May 2026.

On April 3, 2025, Watermaster requested consultation from the Las Posas Valley Policy Advisory Committee (PAC) on:

1) Preferred Alternative. Whether Watermaster should use the UWCD Periodic Evaluation model files to run scenarios for preparation of the Basin Optimization Yield Study rather than estimating the Basin Optimization Yield and Rampdown (i) using GSP periodic evaluation model simulations or (ii) using historical groundwater elevation measurements and extraction reports?

2) Schedule Impact. Whether using the UWCD Periodic Evaluation model files to complete the Basin Optimization Yield Study in April 2026 for adoption at the May 2026 Watermaster Board of Directors meeting, approximately four months before the start of Water Year 2026 (October 1, 2026, through September 30, 2027), is a reasonable alternative for timely completion of the Basin Optimization Yield Study?

The PAC discussed Watermaster's requests for consultation and the March 31 Preferred Modeling Approach Memorandum at its April 17, 2025, May 1, 2025, and May 15, 2025, meetings.

PAC's May 15, 2025, recommendation report concurs with the recommended approach in the March 31 memo: "the PAC concurs with the Watermaster and Dudek that the alternative providing for the use of the *Estimation of the BOY Using the UWCD Periodic Evaluation Model Files to Run New Scenarios* is the most favorable approach." But PAC's recommendation

report also requests additional information on the cost and schedule impacts to "upgrading the periodic model" to address three specific topics. These topics are:

1) Extending the model period to 2024.
2) Understanding the impacts of UWCD's change to the model boundary conditions on simulated water levels in the eastern part of the WLPMA.
3) Recalibrating, validating, and performing sensitivity and uncertainty analyses to support the model.

The PAC recommendation report concludes, "receiving this additional information will help the Watermaster make a more informed decision about the tradeoffs between advancing the study with Dudek and waiting for United to contract to do the modeling." The response to each of PAC's request for more information on potential modifications, or "upgrades," to the UWCD Periodic Evaluation model is discussed below.

Request for Information 1: Extend the model period to 2024 (instead of 1979)
Response to Request for Information 1:
In this request for information, PAC appears to be confusing the period used to simulate future hydrology in the model (1930-1979) with extension of the historical model (1985-2022). UWCD updated the historical Coastal Plain Model period between 2018, when it was used for the Groundwater Sustainability Plan (GSP), and 2024, when it was used for the Periodic Evaluation. The updated historical model was extended to simulate groundwater conditions in the WLPMA through the end of water year 2022 (FCGMA 2025). The simulated groundwater elevations in the historical model can be compared to measured groundwater elevations over the same time period in order to calibrate and validate the model. Watermaster believes that extension of the historical model through 2022 is a reasonable update to the model that captures recent trends in LPV groundwater conditions. Watermaster does not believe that the historical model requires updating through 2024 to be able to conduct the model simulations to assess the BOY.

The Periodic Evaluation simulated potential future groundwater conditions under differing groundwater management frameworks. As required by the Sustainable Groundwater Management Act (SGMA), the future simulations evaluated conditions over a 50-year planning and implementation horizon. Consequently, these simulations must include estimates of future hydrologic parameters, such as precipitation and streamflow. These future estimates can be based on past historical periods or can be constructed from hydrologic modeling, statistical methods, or climate projections. During development of the Groundwater Sustainability Plan (GSP), the FCGMA GSP Technical Advisory Group (TAG) reviewed multiple potential 50-year hydrology options and recommended that the period from 1930 through 1979 should be adopted as the 50-year future hydrology. The Periodic Evaluation adopted the same approach. Watermaster believes that this remains a

reasonable approach for incorporating hydrologic parameters into the future groundwater management scenarios.

Request for Information 2: Refine the understanding of groundwater level responses to simulated projects in the eastern WLPMA.
The Somis fault was changed from a NO FLOW to GENERAL HEAD BOUNDARY for the periodic evaluation, but the model was not recalibrated. In-lieu water delivery projects are proposed in the vicinity of that fault and a more refined understanding of how the water levels would respond with these revised assumptions about the fault are important.

Response to Request for Information 2:
Although UWCD has not yet published updated model documentation detailing the specific changes made to the model between the version used in the GSP and the version used in the Periodic Evaluation, Watermaster understands that the updated model was recalibrated by UWCD before it was used in the Periodic Evaluation (FCGMA 2024). Therefore, Watermaster does not believe that additional calibration is required for use of this model to determine the BOY.

The Periodic Evaluation included a Projects Scenario that is similar to the Projects Scenario that will be conducted for the BOY Study (FCGMA 2024; See Section 5.2.2.1.5). In this scenario, 1,762 AFY of imported water was purchased and delivered to Zone Mutual Water Company and Wateworks District No. 19 in the eastern WLPMA, in lieu of groundwater extraction. In this scenario, simulated water levels at Well 02N20W06R01, which is a key well adjacent to the Somis Fault, rose above the minimum threshold groundwater elevation within the planning and implementation horizon and remained above the minimum threshold groundwater elevation for the remainder of the 50-year predictive model run. Watermaster notes that groundwater elevations at well 02N20W06R01simulated for the Periodic Evaluation Projects Scenario were consistently lower than simulated groundwater elevations at the same well for the GSP Projects Scenario. This difference indicates that simulated groundwater level recoveries are impacted by the modification to the model boundary conditions, but it does not necessarily indicate that the groundwater elevations simulated for the GSP are more accurate than those simulated for the Periodic Evaluation. The discrepancy between the simulated groundwater elevations in the two projects scenarios is a known consequence of the changed boundary condition in the Periodic Evaluation model. Nevertheless, Dudek identified use of the Periodic Evaluation model files to calculate the BOY in the WLPMA as the preferred alternative.

Request for Information 3: Perform the model recalibration, as well as the model validation, sensitivity, and uncertainty analyses needed to support the model. The Dudek memorandum dated March 31, 2025, reported that the necessary documentation of the periodic evaluation model was not available. The PAC recommends that this deficiency be

eliminated for any model used in the BOYS. These technical evaluations of the model can make the process of fostering stakeholder acceptance a more straightforward endeavor.

Response to Request for Information 3:

As noted in Response to Request for Information 2, Watermaster understands that the updated model was recalibrated by UWCD before it was used in the Periodic Evaluation. In order to conduct a model calibration, validation, sensitivity, or uncertainty analysis, Watermaster would need access to the historical model files. After completing the modeling for the Periodic Evaluation, UWCD provided Watermaster with the model files used to simulate potential future groundwater conditions under differing groundwater management frameworks. These files differ from the historical model files, which cover the period from 1985 to 2022. Therefore, Watermaster cannot conduct the additional analyses requested by the PAC.

Conclusion

Under the Judgment, the purpose of the PAC and the Technical Advisory Committee is to "establish a specific and formal process to obtain policy and technical recommendations from stakeholders" (Judgment § 6.2). Watermaster requested review of the preferred approach to completing the BOY Study from both PAC and TAC. PAC "concurs with Watermaster and Dudek that the alternative providing for the use of the Estimation for the BOY Using the UWCD Periodic Evaluation Model Files to Run New Scenarios is the most favorable approach." TAC agrees that "the proposed approach preserves the original technical methodology for basin optimization and maintains consistency with the GSP and other analyses." Therefore, Watermaster has engaged with stakeholders, via the PAC and TAC, to "ensure that decisions by Watermaster are made following full consideration of diverse policy and technical views," consistent with the Judgment (Judgment § 6.2).

Finally, Watermaster must prepare a BOY Study "every five years in coordination with the GSP Updates (Wat. Code, §10728.2) or at Watermaster's discretion in response to material changing or changed Basin Conditions" (Judgment § 1.22). This first BOY Study to be prepared under the Judgment is projected to be completed by spring 2026. The BOY Study schedule has already been delayed five months. Further delaying the completion of the first BOY Study beyond spring 2026 jeopardizes Watermaster's ability to implement management actions to ensure Sustainable Groundwater Management by 2040 (Judgment § 4.10.2).

In the absence of additional material changes to groundwater conditions, Watermaster anticipates that preparation of the second BOY Study would begin in 2028, only two years after completion of the first BOY Study, in order to be completed prior to January 2030 in coordination with the GSP Periodic Evaluation, as required by the Judgment. Changes to the modeling approach can be considered for the 2030 BOY Study.

Completion of the first BOY Study in spring 2026 will allow stakeholders and Watermaster to review the management actions undertaken as part of that study and make any necessary adjustments prior to the second BOY Study. Because the Judgment requires Watermaster to prepare the second BOY Study by January 2030 and allows Watermaster to prepare a BOY Study more frequently, if necessary, Watermaster recommends advancing the first BOY Study using the recommended approach provided in the March 31 memo.

DRAFT LAS POSAS VALLEY WATERMASTER RESPONSE REPORT

Date: June 9, 2025

To: Las Posas Valley Watermaster Board of Directors

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

Re: Response Report to TAC Consultation Recommendation Report, BOYS Preferred Modeling Alternative and Impacts to Schedule

In a March 31, 2025, memo, the Las Posas Valley Watermaster (Watermaster) consultant outlined three potential approaches to calculating the Basin Optimization Yield (BOY) and described the anticipated schedule impacts for each approach. Of the three approaches outlined in the March 31 memo, Watermaster's consultant recommended calculation of the BOY using the United Water Conservation District (UWCD) model files developed for the Periodic Evaluation of the Groundwater Sustainability Plan for the Las Posas Valley Basin (Periodic Evaluation). Under the schedule proposed in the memo, the development of the Draft BOY Study is anticipated to be completed by December 2025 and the final BOY Study is anticipated to be completed by May 2026.

On April 3, 2025, Watermaster requested consultation from the Las Posas Valley Policy Advisory Committee (PAC) on two topics:

1) Should the Watermaster use the UWCD Periodic Evaluation model files to run scenarios for preparation of the Basin Optimization Yield Study rather than estimating the Basin Optimization Yield and Rampdown (i) using GSP periodic evaluation model simulations or (ii) using historical groundwater elevation measurements and extraction reports?
2) Is the schedule to implement the alternative in (1) and complete the Basin Optimization Yield Study in April 2026 for adoption at the May 2026 Watermaster Board of Directors meeting, approximately four months before the start of Water Year 2026 (October 1, 2026 through September 30, 2027), a reasonable alternative for timely completion of the Basin Optimization Yield Study?

The TAC discussed and developed its recommendation report at April 15, May 6, and May 9, 2025, meetings. TAC's May 9, 2025, recommendation report included three recommendations. Each of these recommendations is listed below followed by Watermaster's response.

Recommendation 1: CONSIDER ADDRESSING THE SOMIS FAULT REPRESENTATION IN THE COASTAL PLAIN MODEL BEFORE PERFORMING BASIN OPTIMIZATION YIELD MODEL SIMULATIONS

As described in TAC comments and recommendations on the Draft First Periodic Evaluation, Groundwater Sustainability Plan for the Las Posas Valley Basin (Draft GSP Evaluation) (*TAC Consultation Recommendation Report, Draft First Periodic Evaluation, Groundwater Sustainability Plan for the Las Posas Valley Basin*, dated October 10, 2024), modifications to the version of the Coastal Plain model used in the GSP Evaluation to simulate conditions in the WLPMA included a significant change to the boundary condition used to represent the Somis Fault. This fault, which separates the WLPMA from the ELPMA, was changed from a no-flow boundary condition to a partial general head boundary condition. This change means the Coastal Plain Model used for the Draft GSP Evaluation and proposed for use in the BOYS optimization simulations allows flow from the WLPMA to the ELPMA. The average annual flow rate from the WLPMA to the ELPMA from 2016 to 2022 presented in the GSP Evaluation was 832 acre-feet per year, which represents slightly less than 17 percent of the change in groundwater storage in the WLPMA during the period.

As the TAC has noted in our October 10, 2024 Recommendation Report, the Draft GSP Evaluation indicates that the limited groundwater elevation information in this area of the LPVB implies there is little groundwater flow across the Somis Fault. In addition, local groundwater gradients suggest that if flow occurs it would be from ELPMA to WLPMA. In response to this comment, the Watermaster indicated the TAC recommendations were forwarded to UWCD and that:

> "UWCD is currently working on the supplemental documentation to cover the changes made since the GSP. As of the time this response report was prepared, UWCD had not yet provided a date when the supplemental documentation will be made available."

Unfortunately, such supplemental documentation is still not available.

The TAC further recommended in October 2024 that the Watermaster

> "Advance the coordination with UWCD and the TAC to develop agreement on the representation of this boundary in the two models. The coordination of this boundary between the two models should not wait until after the GSP is amended. The analyses in the amended GSP should be consistent with the Basin Optimization Yield Study."

While use of the GSP periodic evaluation model simulations as suggested in the preferred alternative for yield optimization in the WLPMA is consistent with the GSP periodic evaluation, the TAC has significant concerns over the representation of the Somis Fault in

that model. The TAC is specifically concerned that the apparent conflict between the groundwater flow direction and magnitude of average annual flow in the GSP periodic evaluation model simulations and the observed water levels and groundwater gradients in this area indicate the model is an inappropriate tool for simulating future conditions with changed management and the addition of projects designed to increase groundwater storage and elevations in the WLPMA.

1.1 Recommendations:
The TAC recommends that Watermaster and their consultant Dudek evaluate and report back to the TAC if the GSP periodic evaluation model simulation files currently in their possession could be used to assess and quantify the potential impacts to available water supply in the WLPMA given the apparent groundwater flow direction discrepancy between the Coastal Plain model and observed local groundwater conditions around the Somis Fault boundary between the WLPMA and ELPMA.

Response to Recommendation 1:
Compliance with SGMA and the need to implement management actions that may impact water supply will be determined by measured groundwater elevations at key wells in the Las Posas Valley Basin. As discussed in the GSP, measured groundwater elevations that remain above the minimum threshold groundwater elevations defined at key wells in the eastern WLPMA are sufficient to avoid undesirable results in this portion of the WLPMA. If groundwater elevations fall below the minimum threshold groundwater elevations, additional management actions, including the potential for demand reduction, may be required. Consistent with historical groundwater measurements, both the Groundwater Sustainability Plan (GSP) and the Periodic Evaluation modeling efforts found that implementation of in-lieu surface water delivery projects in the eastern WLPMA is likely sufficient to avoid undesirable results.

The primary difference between the Project model scenarios in the GSP and the Periodic Evaluation is the change in the model boundary condition in the eastern WLPMA. In order to evaluate the potential impact of the model boundary change on water supplies and the potential need to implement additional management actions in the WLPMA, Watermaster compared the groundwater elevation responses simulated in the GSP to those simulated in the Periodic Evaluation.

Simulated groundwater levels for the GSP and Periodic Evaluation Projects scenarios at Well 02N20W06R01, a key well adjacent to the Somis Fault, are indicative of the influence of the model boundary change on the potential simulated influence of projects in the WLPMA. The two Projects scenarios simulated similar reductions in groundwater production in the WLPMA. In both Projects scenarios, groundwater levels rose above the minimum threshold groundwater elevation prior to 2040 and remained above the minimum threshold groundwater elevation for the remainder of the GSP implementation horizon. Watermaster

notes that groundwater elevations at well 02N20W06R01simulated for the Periodic Evaluation Projects Scenario were consistently lower than simulated groundwater elevations at the same well for the GSP Projects Scenario. This difference indicates that simulated groundwater level recoveries are impacted by the modification to the model boundary conditions, but it does not necessarily indicate that the groundwater elevations simulated for the GSP are more accurate than those simulated for the Periodic Evaluation.

Watermaster also compared the simulated flow across the eastern WLPMA model boundary between the Periodic Evaluation Baseline and Projects model scenarios to better understand the magnitude of change in the simulated flow that would result from Project implementation in the model. As expected, the average annual flow leaving the model boundary to the east increased between the Baseline and Projects scenarios in the Periodic Evaluation. The average annual flow leaving the model domain on the eastern boundary of the WLPMA over the 47-year model period, was 885 AFY in the Baseline simulation that incorporated the 2070 DWR climate factors. In the Projects scenario, the average annual flow across the eastern boundary of the WLPMA increased to 1,920 AFY over the 47-year model period. This increase in flow occurred in response to rising groundwater elevations that resulted from: (1) the simulated delivery of surface water to Ventura County Waterworks District 1, in the eastern portion of the WLPMA in lieu of groundwater extraction, and (2) a simulated reduction in groundwater demands for Zone Mutual Water District. The average annual simulated reduction in groundwater production between the Periodic Evaluation Baseline and Projects scenarios is 1,983 AFY.

Watermaster agrees with TAC that this simulated flow is not consistent with the hydrogeologic conceptual model, but notes that groundwater management decisions will be based on observed water levels. Because the Periodic Evaluation model simulates groundwater elevations in the eastern portion of the WLPMA that rise above the minimum threshold prior to 2040 and remain above the minimum threshold for the duration of the model scenario, use of the UWCD model files developed for the Periodic Evaluation remains the best available option to evaluate the BOY and complete this first BOY study prior to the beginning of the 2027 water year (October 1 2026 – September 30, 2027).

Recommendation 2: CLARIFY WHAT CRITERIA WILL BE USED TO ASSESS UNDESIRABLE RESULTS IN THE WLPMA WHEN COMPARING BASIN OPTIMIZATION YIELD STUDY PROJECT AND ALTERNATIVE PUMPING SCENARIOS TO THE BASELINE SCENARIO

In the October 10, 2024 Recommendation Report on the Draft GSP Periodic Evaluation, the TAC also commented on the relationship between the Oxnard Subbasin and sustainability in the WLPMA. In that comment, the TAC expressed concern that the methodology used to assess the effects of pumping in the WLPMA on seawater intrusion in the Oxnard Subbasin did not effectively isolate the effects of changes in pumping in WLPMA on conditions in the Oxnard Subbasin. As pointed out in our October 10, 2024 Recommendation Report:

> "The Draft GSP Evaluation presented model scenarios that included simultaneous changes in pumping volumes in the WLPMA, both Oxnard aquifers, and the Pleasant Valley Basin. The results of these simulations were then compared to a baseline scenario and the changes to simulated seawater intrusion in the Oxnard Subbasin were used to evaluate effects on sustainable yield in the WLPMA. However, the changes to pumping volumes in the scenarios appeared to be relatively arbitrary and the TAC is concerned that the resulting sustainable yield estimates for the WLPMA are similarly arbitrary."

The TAC recommended development of model scenarios designed to limit changes between compared simulations to single variables to isolate the impacts of those variables on sustainability. To the TAC's knowledge isolated variable model simulations for this purpose have not been completed to date.

Given this uncertainty, the TAC recommends the Watermaster and Dudek clarify what criteria will be used to assess the presence of undesirable results in the WLPMA when comparing the projects and alternative pumping scenarios to the baseline scenario.

2.1 Recommendations:

Clarify what criteria will be used to assess undesirable results conditions in the WLPMA when comparing the projects and alternative pumping scenarios to the baseline scenario. The TAC is specifically interested in understanding if simulated effects on seawater intrusion conditions in the Oxnard Subbasin will be used as a component of the criteria for assessing undesirable results, or if comparisons of simulated conditions within the WLPMA will be the sole criteria.

Response to Recommendation 2:
Consistent with the GSP, Watermaster will use groundwater elevations in the WLPMA to assess whether the WLPMA is meeting the sustainability goal. The minimum threshold and measurable objective groundwater elevations defined in the GSP were found to represent elevations that would not impair the ability of the Oxnard Subbasin to eliminate net seawater intrusion over the SGMA planning and implementation horizon. The simulated groundwater elevations in the model scenarios developed for the Periodic Evaluation were above the minimum threshold groundwater elevations at all the key wells in the WLPMA after 2040. Furthermore, at the majority of the key wells in the WLPMA, the simulated groundwater elevations were above the measurable objectives after 2040. This is the same model that will be used to evaluate groundwater conditions for the BOY Study.

Recommendation 3: PREEMPTIVELY CONSIDER WHAT INFORMATION FROM THE BASIN OPTIMIZATION MODEL SCENARIOS CAN BE SHARED WITH THE TAC AND OTHER INTERESTED PARTIES

The Watermaster informed the TAC that some information from the model that they and Dudek plan to use for the basin optimization assessments of the West Las Posas Management Area (WLPMA) are subject to a protective order in the Oxnard Subbasin and Pleasant Valley Subbasin (OPV) Adjudication. Specifically:

> Some of the model files that Watermaster will use to prepare the LPV basin optimization yield study (specifically in the West Las Posas Management Area) includes files received from United Water Conservation District. These files and the information embedded in them may be subject to a protective order in the OPV Adjudication. Requests for access to or disclosure of those files will be reviewed against that protective order by FCGMA [Fox Canyon Groundwater Management Agency] counsel on a case-by-case basis.

In reviewing the scope of work for the BOYS, the TAC requested additional time and consultation to allow opportunities to receive and review information from the optimization model scenarios. The uncertainty regarding the TAC's ability to review information from the WLPMA optimization modelling concerns the TAC. As a means of avoiding this uncertainty and delays associated with legal review of requests for model information, the TAC proposes to provide test case requests for types of information for Watermaster counsel to review before the optimization modeling of the WLPMA is complete.

3.1 Recommendations:

The TAC specifically recommends that Watermaster staff and legal counsel consider whether information including but not limited to those listed below can be provided from the Coastal Plain model simulations planned for assessing basin optimization yield from the WLPMA.

- Time series datasets showing comparison of model inputs representing simulation of project and alternative pumping scenarios to the baseline scenario.
- Time series of simulated head data at key wells and other important locations for baseline, project, and alternative pumping scenarios.
- Total and zonal water budgets for the entire model area, portions of the model area, boundaries at the edges of the model, and boundaries between specific portions of the model for the baseline, projects, and alternative pumping scenarios.
- Total and zonal water budgets for the WLPMA portion of the model area, zones within the WLPMA portion of the model area, boundaries at the edges of the WLPMA within

the model, and boundaries between specific portions of the WLPMA model for the baseline, projects, and alternative pumping scenarios

Response to Recommendation 3:
Watermaster understands TAC's request to be able to review specific inputs to and outputs from the numerical model simulations to be conducted for the BOY Study. The UWCD model files, including those used to conduct simulations for the Periodic Evaluation, may be subject to a protective order in *OPV Coalition, et al. v. Fox Canyon Groundwater Management Agency, et al.*, Santa Barbara Sup. Ct. Case No. VENCI00555357. To date, UWCD has not agreed to conduct the model simulations for preparation of the BOY Study.

Although Watermaster and legal counsel will review each TAC request prior to providing data to TAC, Watermaster currently understands that:

- Watermaster will be able to provide TAC with groundwater production at each well for the baseline, project, and alternative pumping scenarios. This data was developed by Dudek, after consultation with the TAC, and is based on the allocation tables in the Judgment.
- Watermaster will be able to provide TAC with timeseries of simulated head data at key wells and other locations for baseline, project, and alternative pumping scenarios.
- Watermaster will not be able to provide total and zonal water budgets for the entire model area, portions of the model area, boundaries at the edges of the model, and boundaries between specific portions of the model for the baseline, projects, and alternative pumping scenarios because these areas are outside the Las Posas Valley Basin and, therefore, are outside the scope of the BOY Study for the Las Posas Valley Basin.
- Watermaster will be able to provide total water budgets for the WLPMA portion of the model, including boundaries at the edges of the WLPMA within the model for the baseline, projects, and alternative pumping scenarios. Watermaster will also be able to provide, within reason, zonal water budgets for zones within the WLPMA portion of the model area and boundaries between specific portions of the WLPMA model for the baseline, projects, and alternative pumping scenarios.

Conclusion
Watermaster agrees with TAC that the modeled increase in flow across the eastern boundary of the WLPMA is inconsistent with the hydrogeologic conceptual model. However, Watermaster notes that the model simulations conducted for the Periodic Evaluation generated multiple sustainable groundwater management scenarios in which groundwater elevations rose to and remained above the minimum thresholds during the GSP planning and implementation horizon. After noting the change in the model boundary conditions in both the Periodic Evaluation and the March 31, 2025, memo, Dudek concluded that running

the UWCD Updated Coastal Plain Model used during development of the Periodic Evaluation was the recommended approach to complete this first BOY Study.

Watermaster must prepare a BOY Study "every five years in coordination with the GSP Updates (Wat. Code, §10728.2) or at Watermaster's discretion in response to material changing or changed Basin Conditions" (Judgment § 1.22). This first BOY Study to be prepared under the Judgment is projected to be completed by spring 2026. The BOY Study schedule has already been delayed five months. Further delaying the completion of the first BOY Study beyond spring 2026 jeopardizes Watermaster's ability to implement management actions to ensure Sustainable Groundwater Management by 2040 (Judgment § 4.10.2).

In the absence of additional material changes to groundwater conditions, Watermaster anticipates that preparation of the second BOY Study would begin in 2028, only two years after completion of the first BOY Study, in order to be completed prior to January 2030 in coordination with the GSP Periodic Evaluation, as required by the Judgment. Changes to the modeling approach can be considered for the 2030 BOY Study.

Completion of the first BOY Study in spring 2026 will allow stakeholders and Watermaster to review the management actions undertaken as part of that study and make any necessary adjustments prior to the second BOY Study. Because the Judgment requires Watermaster to prepare the second BOY Study by January 2030 and allows Watermaster to prepare a BOY Study more frequently, if necessary, Watermaster recommends advancing the first BOY Study using the recommended approach provided in the March 31 memo.

June 25, 2025

Board of Directors
Fox Canyon Groundwater Management Agency
800 South Victoria Avenue
Ventura, CA 93009-1600

SUBJECT: Las Posas Valley Basin Optimization Yield Study Preferred Modeling Alternative Approach [LPV Watermaster] – *(Returning Item)*

RECOMMENDATIONS: (1) Receive a presentation from Agency staff on the Las Posas Valley Basin Optimization Yield Study preferred modeling alternative, preparation schedule, related Committee Recommendation Reports, and related Watermaster Response Reports; and **(2)** Provide direction to staff on preferred modeling alternative, schedule, and response reports.

BACKGROUND:
The Judgment requires Watermaster to prepare a Basin Optimization Yield Study. (Judgment, §§ 3.3, 4.10, 5.1.) The Basin Optimization Yield Study will establish the operating yield, and in turn the amount and rate of rampdown in each water year (WY) through WY 2039 so that the operating yield and sustainable yield for the Las Posas Valley (LPV) Basin match by WY 2040 and thus result in the LPV Basin being managed sustainably in accordance with the Sustainable Groundwater Management Act (SGMA) (Judgment, § 4.10.2.).

Under the Judgment, the Basin Optimization Yield Study was to be completed, with consultation with the LPV Policy Advisory Committee (PAC) and the LPV Technical Advisory Committee (TAC), by January 29, 2025. (Judgment, Exh. A, § 2.10.1.) In a December 23, 2024, memorandum to both the PAC and TAC, Watermaster explained that the Basin Optimization Yield Study could not be completed according to this original schedule and instead proposed completing the Study by the end of December 2025; however, Watermaster's memoranda explained that this schedule assumed it would obtain access to United Water Conservation (UWCD) model(s) and/or modeling services. If Watermaster was unable to obtain access to UWCD model files(s) and/or modeling services, then Watermaster explained that it must develop alternative approaches to using UWCD model(s) and/or modeling services to complete the Basin Optimization Yield Study (attached as Exhibit 13A). These alternative approaches included (i) estimating the Basin Optimization Yield and Rampdown using GSP periodic evaluation model simulations; (ii) estimating the Basin Optimization Yield and Rampdown using historical

groundwater elevation measurements and extraction reports; and (iii) developing a new numerical groundwater flow model for the West Las Posas Management Area. These alternatives would add approximately three to six months, three to six months, and 18 to 24 months, respectively, to the schedule for completing the Basin Optimization Yield Study (Exhibit 13A).

In early 2025, Agency staff working with their consultant, Dudek, developed an additional alternative approach, estimating the Basin Optimization Yield using the UWCD Periodic Evaluation model files to run new scenarios. At the January 22, 2025, meeting, Agency staff gave your Board a presentation on the schedule for preparing the Basin Optimization Yield Study. At that meeting your Board approved extending the initial operating yield of the basin set by the Judgment for one water year. Your Board also directed Agency staff and Dudek to omit the development of a new numerical flow groundwater model alternative approach from further consideration due to associated impacts on the schedule and also to review and select a preferred model approach to be submitted to PAC and TAC for consultation. On April 03, 2025, Agency staff sent memoranda to PAC and TAC requesting additional consultation on an updated Basin Optimization Yield Study – Preferred Modeling Alternative and impacts on schedule (Exhibit 13B). At the April 23, 2025, meeting, Agency staff provided your Board an update on the preferred model alternative approach and its potential impact on the Basin Optimization Yield Study schedule. Under this preferred alternative approach, Watermaster anticipates the Basin Optimization Yield Study (including necessary committee consultation) will be completed in April 2026 and ready for adoption by your Board at the May 2026 meeting. Adoption in May 2026 would allow your Board to make decisions regarding allocations and rampdown well in advance (approximately four months) of the start of the 2027 Water Year.

The PAC discussed and developed its May 15, 2025, recommendation report on Watermaster's preferred modeling alternative and schedule at its April 17, May 1, and May 15 PAC meetings (Exhibit 13C). The TAC discussed and developed its May 09, 2025, recommendation report at its April 15, May 16, and May 9 TAC meetings (attached as Exhibit 13D).

DISCUSSION:
In general, both PAC and TAC appreciated the efforts of Agency staff and Dudek to prepare and provide a preferred alternative approach that maintains the original technical methodology employed in past evaluations of the basin and acknowledge that, under the circumstances, the preferred alternative is the best approach. Specifically, the PAC's May 15, 2025, recommendation report concurs with the recommended approach: "[T]he PAC concurs with the Watermaster and Dudek that the alternative providing for the use of the Estimation of the BOY Using the UWCD Periodic Evaluation Model Files to Run New Scenarios is the most favorable approach." Similarly, the TAC acknowledges Watermasters efforts to engage UWCD and developing the preferred alternative approach stating, "The TAC would also like to express gratitude to the Watermaster for working diligently to develop an agreement with UWCD to access and use the current version of the Coastal Plain groundwater model and to Watermaster staff and Dudek for identifying this alternative. The proposed approach preserves the original technical methodology for basin optimization and maintains consistency with the GSP and other

analyses that also employed the two models representing the LPVB." However, both PAC and TAC raised additional concerns and included recommendations on the preferred model alternative in their recommendation reports, attached as Exhibits 13C and 13D, respectively.

Watermaster and Dudek have prepared Response Repots that respond in detail to each of the concerns and/or recommendations raised by the two advisory committees. These Response Reports are attached as Exhibits 13E and 13F, respectively. Specifically, the PAC recommended the preferred modeling alternative be updated to include data through WY 2024; recalibrate the model and update model sensitivity analyses; and obtain documentation for the model. (See Exhibit 13C.) As explained in more detail, the historical model files used for Periodic Evaluation model files were last extended to simulate groundwater conditions in the West Las Posas Management Area through the end of Water Year 2022; Watermaster believes that the historical model files do not need to be updated further to conduct the simulations needed to prepare the BOY Study. Similarly, Watermaster does not believe the model needs to be recalibrated because it was last done by UWCD in preparation for the 2024 Periodic Evaluations. Watermaster cannot conduct additional sensitivity and uncertainty analysis without UWCD's cooperation. Finally, UWCD has not provided the Agency with documentation on the model files, including any documentation regarding the change of the Somis fault boundary from a NO FLOW to a GENERAL HEAD BOUNDARY. In its response report, Watermaster and Dudek explain that this boundary change is a known issue but continues to recommend use of the Periodic Evaluation model files as the preferred model alternative to complete the BOY Study. (See Exhibit 13E.)

The TAC raised similar concerns with the model changes to the Somis fault boundary. (See Exhibit 13D.) In the attached Response Reports, Watermaster and Dudek explain that while model simulations may be less accurate due to the changed Somis fault boundaries, management decisions will be made on observed conditions (rather than model simulations). Also, under the circumstances, Watermaster and Dudek explained that the UWCD Periodic Evaluation model files are the best option available to estimate the basin optimization yield and prepare the BOY Study. TAC also requested Watermaster clarify what criteria will be used to assess undesirable results and whether certain data points and estimates produced from model simulations will be available for TAC review. The Response Report explains that Watermaster will use groundwater elevations to evaluate basin conditions and identifies the specific data that will and cannot be made available to the TAC from the UWCD Periodic Evaluation model files. (Exhibit 13F.)

The purposes of the advisory committees is to "establish a specific and formal process to obtain policy and technical recommendations from stakeholders" (Judgment § 6.2). Watermaster requested review of the preferred approach to completing the BOY Study from both PAC and TAC. PAC "concur[ed] with Watermaster and Dudek that the alternative providing for the use of the Estimation for the BOY Using the UWCD Periodic Evaluation Model Files to Run New Scenarios is the most favorable approach." TAC agrees that "the proposed approach preserves the original technical methodology for basin optimization and maintains consistency with the GSP and other analyses."

Therefore, Watermaster has engaged with stakeholders, via the PAC and TAC consultation processes, to "ensure that decisions by Watermaster are made following full consideration of diverse policy and technical views," consistent with the Judgment (Judgment § 6.2). Agency staff believe Watermaster has complied with the committee consultation requirements of the Judgment.

The Basin Optimization Yield study is also an iterative process scheduled to coincide with the Groundwater Sustainability Plan (GSP) Updates at five-year intervals (Wat. Code, §10728.2) or at Watermaster's discretion in response to material changing or changed Basin Conditions" (Judgment § 1.22). The Basin Optimization Yield Study schedule has already been delayed by five months. Further delaying the completion of the first BOY Study beyond spring 2026 jeopardizes Watermaster's ability to implement management actions to ensure Sustainable Groundwater Management by 2040 (Judgment § 4.10.2). Furthermore, absent additional material changes to groundwater conditions, Watermaster anticipates that preparation of the second Basin Optimization Yield Study would begin in 2028, only two years after completion of this first BOY Study, in order to be completed prior to January 2030 in coordination with the GSP Periodic Evaluation, as required by the Judgment. Changes to the modeling approach can be considered for the 2030 Basin Optimization Yield Study.

CONCLUSION:
Staff recommends that your Board (1) receive a presentation from Agency staff on the Las Posas Valley Basin Optimization Yield Study preferred modeling alternative, preparation schedule, related Committee Recommendation Reports, and related Watermaster Response Reports; and (2) Provide direction to staff on the preferred modeling alternative, schedule, and completion of response reports.

This letter has been reviewed by Agency Counsel. If you have any questions, please call me at (805) 654 2954.

Sincerely,

Kudzai Farai Kaseke (PhD, PH, PMP, CSM)
Assistant Groundwater Manager

Attachments:

Exhibit 13A – Watermaster BOY Schedule Memo to PAC and TAC, December 23, 2024
Exhibit 13B – Watermaster Preferred Modeling Approach Memo to PAC and TAC, April 03, 2025
Exhibit 13C – PAC Recommendation Report, May 15, 2025
Exhibit 13D – TAC Recommendation Report, May 09, 2025
Exhibit 13E – Watermaster Response Report to PAC, June 09, 2025
Exhibit 13F – Watermaster Response Report to TAC, June 09, 2025

MEMORANDUM

To: Las Posas Valley Policy Advisory Committee

From: Kudzai F. Kaseke, Assistant Groundwater Manager

Date: December 23, 2024

RE: Basin Optimization Yield Study Schedule

Dear Las Posas Valley Policy Advisory Committee Members:

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

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

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

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

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

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

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

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

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

MEMORANDUM

To: Las Posas Valley Technical Advisory Committee

From: Kudzai F. Kaseke, Assistant Groundwater Manager

Date: December 23, 2024

RE: Basin Optimization Yield Study Schedule

Dear Las Posas Valley Technical Advisory Committee Members:

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

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

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

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

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

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

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

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

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

MEMORANDUM

To: Las Posas Valley Policy Advisory Committee

From: Kudzai F. Kaseke, Assistant Groundwater Manager

Date: April 03, 2025

RE: Basin Optimization Yield Study – Preferred Modeling Alternative and Impacts to Schedule

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Dear Las Posas Valley Policy Advisory Committee Members:

The LPV Adjudication judgment requires preparation of a Basin Optimization Yield Study, which will set the Basin Optimization Yield, and in turn set the Operating Yield and Rampdown Rate, so that by Water Year 2040 the LPV Basin's Operating Yield is equal to its Sustainable Yield and Sustainable Groundwater Management is achieved. (Judgment, §§ 1.22, 4.10.)

In a December 23, 2024 memorandum to this committee, Watermaster explained that the Basin Optimization Yield Study could be completed by the end of December 2025; this schedule assumed Watermaster would obtain access to UWCD model(s) and/or modeling services. However, if it was unable to obtain access to UWCD model files(s) and/or modeling services, then Watermaster explained that it must develop alternatives to using UWCD model(s) and/or modeling services to complete the Basin Optimization Yield Study. (Exhibit A.) Those alternatives included (i) estimating the Basin Optimization Yield and Rampdown using GSP periodic evaluation model simulations; (ii) estimating the Basin Optimization Yield and Rampdown using historical groundwater elevation measurements and extraction reports; and (iii) developing a new numerical groundwater flow model for the West Las Posas Management Area. These alternatives would add approximately three to six months, three to six months, and 18 to 24 months, respectively, to the schedule for completing the Basin Optimization Yield Study. (Exhibit A.)

Since December 2024, Watermaster and its consultant, Dudek, have identified an additional alternative: estimating the Basin Optimization Yield using the UWCD Periodic Evaluation model files to run new scenarios. Watermaster and Dudek estimate that this alternative would result in the Basin Optimization Yield Study being completed in April 2026 for adoption at the May 2026 Watermaster Board of Directors meeting.

The Watermaster Board of Directors asked Dudek to review and select its preferred modeling alternative, after removing from consideration the alternative of developing a new numerical groundwater flow model for the West Las Posas Management Area (which would

add 18 to 24 months to the schedule) and submit its analysis to the LPV Policy Advisory Committee (PAC) and Technical Advisory Committee (TAC) for consultation. Dudek's analysis of modeling alternatives, and their respective impacts to the schedule, for preparing the Basin Optimization Yield Study is attached as Exhibit B.

CONSULTATION REQUEST

Pursuant to Section 6.3 of the LPV Adjudication judgment, Watermaster requests the PAC provide its recommendations on the following:

1. Preferred Alternative. Whether Watermaster should use the UWCD Periodic Evaluation model files to run scenarios for preparation of the Basin Optimization Yield Study rather than estimating the Basin Optimization Yield and Rampdown (i) using GSP periodic evaluation model simulations or (ii) using historical groundwater elevation measurements and extraction reports?

2. Schedule Impact. Whether using the UWCD Periodic Evaluation model files to complete the Basin Optimization Yield Study in April 2026 for adoption at the May 2026 Watermaster Board of Directors meeting, approximately four months before the start of Water Year 2026 (October 1, 2026 through September 30, 2027), is a reasonable alternative for timely completion of the Basin Optimization Yield Study?

Watermaster requests PAC's Recommendation Report, including its policy recommendations and comments, on the consultation requests discussed in this memorandum by May 09, 2025.

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

MEMORANDUM

To: Las Posas Valley Policy Advisory Committee

From: Kudzai F. Kaseke, Assistant Groundwater Manager

Date: December 23, 2024

RE: Basin Optimization Yield Study Schedule

Dear Las Posas Valley Policy Advisory Committee Members:

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

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

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

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

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

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

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

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

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

March 31, 2025

Dr. Farai Kaseke, Ph.D., P.H., PMP, CSM
Assistant Groundwater Manager
Fox Canyon Groundwater Management Agency
800 South Victoria Avenue
Ventura, California

Subject: Basin Optimization Yield Study Alternative Approach, Scope, and Schedule Impacts

Dear Dr. Kaseke:

In October 2024, the Fox Canyon Groundwater Management Agency (FCGMA) Board of Directors, acting in their role as Watermaster for the Las Posas Valley (LPV) Basin, contracted Dudek to prepare the 2025 Basin Optimization Yield (BOY) Study for the LPV Basin. The purpose of this study, which is a requirement under the Judgment[1], is to quantify the BOY and determine the Rampdown Rate. The definitions of and requirements for determining the BOY and the Rampdown Rate are listed in the Judgment. Dudek's original scope of work assumed that the numerical groundwater models that cover the East Las Posas Management Area (ELPMA) and the West Las Posas Management Area (WLPMA) would be used to determine the BOY. Dudek used the model that covers the ELPMA during development of the Periodic Evaluation of the LPV Basin Groundwater Sustainability Plan and proposed using this model to conduct the required analyses for the BOY Study. In contrast, the model that covers the WLPMA was constructed by and has been operated by United Water Conservation District (UWCD) staff. Consequently, Dudek and the Watermaster assumed that the Watermaster would contract with UWCD separately to conduct the numerical model analyses of the WLPMA for the BOY Study.

Since October, the Watermaster has been unable to reach an agreement with UWCD to conduct the numerical model analyses of the WLPMA for the BOY Study. In December 2024, Watermaster staff requested that Dudek prepare potential alternative approaches to calculating the BOY for the WLPMA if UWCD were unable to perform the numerical model analyses under the approved schedule. The alternatives Dudek developed are:

- Estimation of the BOY using the GSP evaluation model simulations.
- Estimation of the BOY using historical groundwater elevation measurements and extraction reporting.
- Development of a new numerical groundwater flow model for the WLPMA.

[1] *Las Posas Valley Water Rights Coalition v. Fox Canyon Groundwater Management Agency. Case No. VENCI00509700* (Judgment) defines the Basin Optimization Yield as, "the estimated yield that is projected to be available to achieve sustainable groundwater management by 2040.[…] The Basin Optimization Yield will take into account: (i) water available from native groundwater inflows; (ii) Return Flows; (iii) reasonably anticipated enhanced yield (*i.e.,* managed replenishment excluding water stored and dedicated to the Calleguas ASR Project) projected to be available by Water Year 2040 consistent with the projected Basin Optimization Plan; and (iv) opportunities for optimization of the Sustainable Yield achieved by relocating Extraction and transmission of water to avoid Undesirable Results. The Basin Optimization Yield will also, through Adaptive Management, take into account circumstances including: (a) improved understanding of Basin conditions and hydrogeologic parameters as a result of new data over time; (b) the current status of Basin Optimization Projects; and (c) changing hydrological conditions".

The first two alternate approaches were estimated to have a 3- to 6-month impact on the schedule, resulting in a completion date for the BOY Study in spring or summer of 2026. The third alternative was estimated to impact the study completion by 18- to 24-months. These potential alternatives were reviewed by the Technical Advisory Committee (TAC), which agreed with the general estimates of the schedule impacts for each alternative. TAC noted that the third alternative would cost the most and that the schedule impact was likely conservative. However, TAC communicated to the Watermaster that additional information regarding the three alternatives was necessary to provide recommendations regarding the preferred alternative.

The Watermaster requested additional information on the alternatives outlined above, as well as a recommendation from Dudek on the preferred approach to completing the BOY Study. The Watermaster also requested a revised schedule based on the preferred approach. This memo provides the information requested by the Watermaster, with one notable substitution. Dudek does not recommend further pursuit of constructing a new model for this BOY Study because of the high cost and substantial impacts to the schedule. Therefore, construction of a new model has been replaced by an alternative in which Dudek conducts the numerical groundwater modeling of the WLPMA using model files provided to the Watermaster by UWCD. These model files were used to evaluate future conditions in the LPV Basin as part of the Periodic Evaluation of the LPV Basin Groundwater Sustainability Plan and submitted to Watermaster by UWCD as a deliverable in accordance with the contract between Watermaster and UWCD.

The alternative approaches, the preferred approach, and the revised schedule are discussed below.

Alternative Approaches

Alternative 1: Estimation of the BOY Using the GSP Evaluation Model Runs

The Periodic Evaluation of the GSP included five model scenarios that used UWCD's Updated Coastal Plain Model that covers the entirety of the WLPMA, Oxnard Subbasin, and Pleasant Valley Basin. These model scenarios provide a range of estimates of the sustainable yield. UWCD provided the Watermaster with the output files from the model scenarios. These files contain the detailed information on the calculated water budget components and change in storage during the model run. They also contain the simulated groundwater elevations at each model cell for each stress period of the model run.

Under this alternative, Dudek would use the output files provided by UWCD to develop correlations between the water budget components and the groundwater elevations simulated in the various scenarios. These correlations would then be used to estimate the anticipated groundwater elevations at individual wells in the WLPMA under the Operating Yield of 40,000 AFY, based on the distribution of groundwater production in the allocation schedule. The impact of projects would be evaluated by changing the pumping distribution in the WLPMA from the Future Baseline with Projects Scenario modeled in the Periodic Evaluation of the LPV Basin GSP. The correlations would be mapped onto the spatial change in pumping distribution and the resulting predicted groundwater elevations would be compared to those in the baseline analysis. If the estimated groundwater elevations in the project pumping scenario are below the minimum threshold groundwater elevations, up to three additional reduced pumping scenarios would be evaluated using this method, with the goal of estimating the BOY through predicted final groundwater levels that remain above the minimum thresholds. The difference between the operating yield and the highest estimated groundwater production rate that avoids undesirable results will be used as the basis for the Rampdown Rate calculation set forth in the Judgment.

We note that this alternative does not involve running the UWCD model. The intent of this alternative was to provide a method of estimating the BOY if UWCD did not contract with the Watermaster to run the model and did not provide the model files to the Watermaster under its contract with the FCGMA for the GSP evaluation. There are several notable limitations of this proposed alternative, three of which are listed below:

- There is no guarantee that the variables would be correlated well enough to allow for estimation of the BOY beyond what was already done for the Periodic Evaluation of the LPV Basin GSP. Therefore, this analysis may not yield results that the Watermaster would be able to use to calculate the Rampdown Rate with certainty.
- Even if the correlations are strong, these correlations of the model outputs are farther removed from the actual groundwater conditions than the numerical model.
- This method is not well suited to capturing spatial variability in groundwater conditions, particularly when projects are implemented because the correlations include built in assumptions on groundwater flow direction and storage change from the specific numerical model runs on which they are based. The basis for the correlations with projects, would be the Future Baseline with Projects Scenario. However, changing the pumping distribution will impact groundwater flow in ways that may not be captured in this alternative.

Because UWCD, under its contract with the FCGMA for the GSP evaluation, provided the Watermaster with the model files necessary to run scenarios with UWCD's Updated Coastal Plain Model and because of the limitations listed above, Dudek does not recommend that the Watermaster use this alternative to proceed with development of the BOY and the determination of the Rampdown Rate.

Alternative 2: Estimation of the BOY Using Historical Groundwater Elevation Measurements and Extraction Reports

Similar to Alternative 1, this alternative involves correlating groundwater elevations to components of the water budget. The primary difference between these two alternatives, however, is that this alternative would use observed historical data to develop these correlations, not the results of the numerical groundwater model simulations. Under this alternative, Dudek would review historical changes in groundwater elevations across the monitoring network of groundwater wells in the WLPMA. Observed groundwater elevation changes would be compared to historical water budget inputs (e.g., precipitation, UWCD diversions and recharge operations) and outputs (e.g., groundwater production, and subsurface flows estimated by groundwater gradient) quantified in the GSP for the LPV Basin. Depending on the complexity of the observed relationships, additional statistical reduction of the number of controlling factors may be applied via principal component analysis.

As with Alternative 1, the correlations developed from the historical data would be used to estimate the groundwater elevations at individual wells in the WLPMA under the Operating Yield of 40,000 AFY, based on the distribution of groundwater production in the allocation schedule, and the impact of projects would be evaluated by changing the pumping distribution in the WLPMA. Up to three additional reduced pumping scenarios would be evaluated, with the goal of estimating the BOY through predicted final groundwater levels that remain above the minimum thresholds. The difference between the operating yield and the highest estimated groundwater production rate that avoids undesirable results will be used as the basis for the Rampdown Rate calculation set forth in the Judgment.

The benefit of this alternative relative to alternative 1 is that the correlations are developed from observed data, rather than simulated data. This means there is one less step in the abstraction from the actual groundwater conditions. However, in addition to the limitations listed in alternative 1, which this alternative shares, the distribution of wells with historical observations that can be used to develop correlations is likely to be sparser in this alternative. Consequently, estimating the impacts of projects on groundwater elevations throughout the WLPMA would be challenging.

Because the Watermaster now has the model files necessary to run scenarios with UWCD's Updated Coastal Plain Model and the limitations listed above, Dudek does not recommend that the Watermaster use this alternative to proceed with development of the BOY and the determination of the Rampdown Rate.

Alternative 3: Estimation of the BOY Using the UWCD Periodic Evaluation Model Files to Run New Scenarios

UWCD provided the Watermaster with the numerical groundwater model files developed for the Periodic Evaluation as a deliverable under the contract between FCGMA and UWCD to conduct the numerical modeling for the Periodic Evaluation of the LPV Basin GSP. Under this alternative, Dudek would use those files to prepare, run, and analyze up to five model scenarios for the WLPMA using the version of UWCD's Updated Coastal Plain Model used for the Periodic Evaluation. The five model scenarios are:

1. A baseline scenario
2. A projects scenario
3. Up to three alternative pumping scenarios

The baseline scenario would simulate groundwater conditions in the WLPMA through water year 2069 using the hydrologic period from 1930-1979, modified by DWR's 2070 central tendency climate change factors. Groundwater withdrawals in the baseline model scenario would be set equal to the allocations in the Groundwater Allocation Schedule prepared in accordance with the Water Right Holders in the WLPMA. The baseline model scenario would not include projects identified in the Basin Optimization Plan.

To evaluate the benefits of implementing basin optimization projects, the projects scenario would integrate projects that were identified in the Draft Basin Optimization Plan as being practical, reasonable, and cost-effective to implement prior to 2040 using the same hydrology and groundwater pumping as the baseline scenario. Projects would be simulated according to the schedules and scales defined in the Draft Basin Optimization Plan. Groundwater budgets, the change in groundwater in storage, and groundwater levels at key wells simulated in the projects scenario would be compared to those simulated in the baseline scenario in order to provide a quantitative estimate of Basin Optimization Project benefits.

If the Basin Optimization Projects do not avoid undesirable results in the WLPMA, up to three additional model scenarios would be evaluated to define a groundwater production rate that avoids undesirable results. These model runs would incorporate the same Basin Optimization Projects as the Projects scenario. The difference between the operating yield and the highest simulated groundwater production rate that avoids undesirable results would be used as the basis for the Rampdown Rate calculation set forth in the Judgment.

This alternative also has several limitations that the Board, TAC, and Water Right Holders should be aware of. Four critical limitations are:

- UWCD has not yet published documentation for the Updated Coastal Plain model at this time. The last model documentation was published in 2019 at the time the LPV Basin GSP was prepared. Therefore, without updated information, Dudek is unable to assess the totality of the changes that were made to the model since the last model documentation was published in 2019. Consequently, Dudek would be able to run the model and analyze the output files but has not been provided with sufficient background information to fully understand all the model behavior with respect to the LPV Basin. There may be questions that arise from the results of the model simulations that Dudek is unable to answer without additional information.
- UWCD's Surface Water Distribution Model is not publicly available. Therefore, Dudek would not be able to update the representation of conjunctive use and groundwater pumping within the Oxnard Subbasin and Pleasant Valley Basin. If UWCD were running the Updated Coastal Plain model directly, it would be able to update the Surface Water Distribution Model.
- During development of the Periodic Evaluation of the LPV Basin GSP, Dudek identified that UWCD had changed the representation of the Somis Fault on the eastern boundary of the WLPMA from a no-flow boundary to a general head boundary. As a result, the Updated Coastal Plain Model simulated subsurface flows from the WLPMA to the ELPMA in the Periodic Evaluation of the LPV Basin GSP. These flows may increase as projects are implemented or groundwater production is reduced in the model. However, changes to this model boundary would require a re-calibration of the model. Without the complete model documentation and given the timeframe for completing the BOY Study before the start of the LPVB 2026 Water Year in October 2026, Dudek would be unable to change any parameters that would result in the need to recalibrate the Updated Coastal Plain model.
- Without the complete model documentation for changes made since 2019, andp given the timeframe for completing the BOY Study before the start of the LPVB 2026 Water Year in October 2026, Dudek would also be unable to conduct a model validation or uncertainty quantification for the BOY Study.

Although the limitations of this alternative are serious, and Dudek would have preferred that the UWCD staff who built and calibrated Updated Coastal Plain Model conduct the modeling for the BOY, Dudek believes that this alternative uses the best available tool for evaluating the impact of changes to groundwater production rates on groundwater conditions in the WLPMA. Therefore, this is Dudek's recommended alternative.

Revised Schedule

Watermaster Board approved Dudek's scope and schedule for the preparation of the BOY Study at its October 23, 2024, meeting. The schedule, which ended with completion of the BOY Study in December 2025, assumed that UWCD would conduct the numerical groundwater modeling for the WLPMA. The initial tasks that did not rely on UWCD modeling are well underway or have been completed. However, modeling of the baseline scenario was supposed to begin on February 25, 2025, and be completed by March 25, 2025. This modeling has not yet begun because of the ongoing uncertainty surrounding the numerical groundwater modeling of the WLPMA.

The delay in starting the baseline model impacts the entire BOY Study schedule, as the remaining tasks depend on completion of this task. Dudek has prepared a revised schedule (Table 1) that assumes PAC and TAC will require time to review the proposed alternatives and prepare recommendation reports. Under this schedule, the recommendation reports and the Watermaster response report will be presented to the Watermaster Board for consideration at the May 28, 2025 meeting. If the Watermaster Board approves the recommended approach for Dudek to conduct the numerical groundwater analysis of the WLPMA using UWCD's Updated Coastal Plain model,

Dudek will begin the baseline modeling beginning on June 2, 2025, the Monday following the May 28 Board meeting. This schedule is longer than the previously approved schedule primarily because of the timing of consultations with the TAC and the Watermaster Board. Under this schedule, the BOY Study will be completed in May 2026, assuming that the data needed to conduct each task in the study are provided by the start date of the task and that the meeting dates for committee consultation and Board review are met. Changes to the consultation dates or the length of time required for committee review will impact the schedule.

Table 1. Revised Schedule for Preparation of the BOY Study

Description	Duration	Original Schedule Date	Revised Schedule Date
Task 1 - Model Scenario Development			
Presentation of Proposed Model Scenarios to TAC	6	1/7/2025	-
TAC Recommendation Report	14	1/21/2025	-
Watermaster Response Report	14	2/4/2025	-
Recommendation & Response Reports discussed by WM Board at special meeting.	10	2/14/2025	-
Task 2 - Numerical Modeling[1]			
Task 2.1 - Baseline Scenario	21	2/25/2025	6/2/2025 (s)
Task 2.2 - Projects Scenario	28	3/25/2025	6/23/2025 (s)
TAC review of Baseline and Projects	7	4/1/2025	8/5/2025 (m)
TAC Recommendation Report	21	4/22/2025	8/26/2025 (d)
Watermaster Response Report	21	5/13/2025	9/16/2025 (d)
Recommendation & Response Reports discussed by WM Board	15	5/28/2025	9/24/2025 (m)
Task 2.3 - Model Alternative Pumping Scenarios	30	6/27/2025	10/25/2025 (d)
Task 4 - Basin Optimization Yield Study			
Task 4.1 - Draft BOY Study	45	8/11/2025	12/9/2025 (d)
PAC & TAC Recommendation Reports	60	10/10/2025	2/7/2026 (d)
Watermaster Response Report & revised draft BOY Study	21	10/31/2025	2/28/2026 (d)
Recommendation & Response Reports discussed by Watermaster Board; Board provides direction on revised draft BOY Study	26	11/8/2025	3/25/2026 (m)
Task 4.2 - Final BOY Study development following Watermaster Board review	28	12/6/2025	4/22/2026 (d)
Watermaster Board Approval of Final BOY Study	28	12/12/2025	5/27/2026 (m)

1) Task 3 is now part of Task 2 since UWCD declined to conduct WLPMA modeling under contract with the Watermaster.
2) '-' No need for revised schedule because the event has already occurred.
3) Gray text dates can no longer be achieved under the delayed schedule.
4) (s) Start date
5) (d) Deliverable date
6) (m) Meeting date

Dudek understands that Water Right Holders in the LPV Basin require as much advance notice as possible to prepare for allocation rampdowns. This schedule provides the final Rampdown Rate calculation to the Watermaster Board for approval four months before the start of the LPVB 2026 water year.

Conclusions

UWCD's inability to conduct the numerical model simulations for the WLPMA has forced the Watermaster to explore alternative methods for calculating the BOY and has impacted the schedule for calculating the Rampdown Rate and completing the BOY Study. Of the three alternatives discussed in this memo, Dudek recommends running the UWCD Updated Coastal Plain model using the model files used for the Periodic Evaluation of the GSP provided by UWCD as deliverable required under the contract with FCGMA. While this approach has limitations that are discussed above, it will provide the most quantitative estimate of the BOY and uses the best available tool for investigating impacts to groundwater conditions under different groundwater production scenarios. If the Watermaster chooses to proceed with this alternative, and the deadlines provided in Table 1 for task completion and committee consultation are met, the BOY Study should be completed by May 2026, four months before the start of the LPVB 2026 water year.

Please do not hesitate to contact me (760-479-4116) if you have questions or would like to discuss Dudek's recommended approach further.

Sincerely,

Jill Weinberger, PhD, PG
Principal Hydrogeologist

MEMORANDUM

To: Las Posas Valley Technical Advisory Committee

From: Kudzai F. Kaseke, Assistant Groundwater Manager

Date: April 03, 2025

RE: Basin Optimization Yield Study – Preferred Modeling Alternative and Impacts to Schedule

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Dear Las Posas Valley Policy Advisory Committee Members:

The LPV Adjudication judgment requires preparation of a Basin Optimization Yield Study, which will set the Basin Optimization Yield, and in turn set the Operating Yield and Rampdown Rate, so that by Water Year 2040 the LPV Basin's Operating Yield is equal to its Sustainable Yield and Sustainable Groundwater Management is achieved. (Judgment, §§ 1.22, 4.10.)

In a December 23, 2024 memorandum to this committee, Watermaster explained that the Basin Optimization Yield Study could be completed by the end of December 2025; this schedule assumed Watermaster would obtain access to UWCD model(s) and/or modeling services. However, if it was unable to obtain access to UWCD model files(s) and/or modeling services, then Watermaster explained that it must develop alternatives to using UWCD model(s) and/or modeling services to complete the Basin Optimization Yield Study. (Exhibit A.) Those alternatives included (i) estimating the Basin Optimization Yield and Rampdown using GSP periodic evaluation model simulations; (ii) estimating the Basin Optimization Yield and Rampdown using historical groundwater elevation measurements and extraction reports; and (iii) developing a new numerical groundwater flow model for the West Las Posas Management Area. These alternatives would add approximately three to six months, three to six months, and 18 to 24 months, respectively, to the schedule for completing the Basin Optimization Yield Study. (Exhibit A.)

Since December 2024, Watermaster and its consultant, Dudek, have identified an additional alternative: estimating the Basin Optimization Yield using the UWCD Periodic Evaluation model files to run new scenarios. Watermaster and Dudek estimate that this alternative would result in the Basin Optimization Yield Study being completed in April 2026 for adoption at the May 2026 Watermaster Board of Directors meeting.

The Watermaster Board of Directors asked Dudek to review and select its preferred modeling alternative, after removing from consideration the alternative of developing a new numerical groundwater flow model for the West Las Posas Management Area (which would

add 18 to 24 months to the schedule), and submit its analysis to the LPV Policy Advisory Committee (PAC) and Technical Advisory Committee (TAC) for consultation. Dudek's analysis of modeling alternatives, and their respective impacts to the schedule, for preparing the Basin Optimization Yield Study is attached as Exhibit B.

CONSULTATION REQUEST

Pursuant to Section 6.3 of the LPV Adjudication judgment, Watermaster requests the TAC provide its recommendations on the following:

1. Preferred Alternative. Whether Watermaster should use the UWCD Periodic Evaluation model files to run scenarios for preparation of the Basin Optimization Yield Study rather than estimating the Basin Optimization Yield and Rampdown (i) using GSP periodic evaluation model simulations or (ii) using historical groundwater elevation measurements and extraction reports?

2. Schedule Impact. Whether using the UWCD Periodic Evaluation model files to complete the Basin Optimization Yield Study in April 2026 for adoption at the May 2026 Watermaster Board of Directors meeting, approximately four months before the start of Water Year 2026 (October 1, 2026 through September 30, 2027), is a reasonable alternative for timely completion of the Basin Optimization Yield Study?

Watermaster requests TAC's Recommendation Report, including its technical recommendations and comments, on the consultation requests discussed in this memorandum by May 09, 2025.

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

MEMORANDUM

To: Las Posas Valley Technical Advisory Committee

From: Kudzai F. Kaseke, Assistant Groundwater Manager

Date: December 23, 2024

RE: Basin Optimization Yield Study Schedule

Dear Las Posas Valley Technical Advisory Committee Members:

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

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

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

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

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

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

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

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

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

Basin Optimization Yield Study Schedule

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

March 31, 2025

Dr. Farai Kaseke, Ph.D., P.H., PMP, CSM
Assistant Groundwater Manager
Fox Canyon Groundwater Management Agency
800 South Victoria Avenue
Ventura, California

Subject: Basin Optimization Yield Study Alternative Approach, Scope, and Schedule Impacts

Dear Dr. Kaseke:

In October 2024, the Fox Canyon Groundwater Management Agency (FCGMA) Board of Directors, acting in their role as Watermaster for the Las Posas Valley (LPV) Basin, contracted Dudek to prepare the 2025 Basin Optimization Yield (BOY) Study for the LPV Basin. The purpose of this study, which is a requirement under the Judgment[1], is to quantify the BOY and determine the Rampdown Rate. The definitions of and requirements for determining the BOY and the Rampdown Rate are listed in the Judgment. Dudek's original scope of work assumed that the numerical groundwater models that cover the East Las Posas Management Area (ELPMA) and the West Las Posas Management Area (WLPMA) would be used to determine the BOY. Dudek used the model that covers the ELPMA during development of the Periodic Evaluation of the LPV Basin Groundwater Sustainability Plan and proposed using this model to conduct the required analyses for the BOY Study. In contrast, the model that covers the WLPMA was constructed by and has been operated by United Water Conservation District (UWCD) staff. Consequently, Dudek and the Watermaster assumed that the Watermaster would contract with UWCD separately to conduct the numerical model analyses of the WLPMA for the BOY Study.

Since October, the Watermaster has been unable to reach an agreement with UWCD to conduct the numerical model analyses of the WLPMA for the BOY Study. In December 2024, Watermaster staff requested that Dudek prepare potential alternative approaches to calculating the BOY for the WLPMA if UWCD were unable to perform the numerical model analyses under the approved schedule. The alternatives Dudek developed are:

- Estimation of the BOY using the GSP evaluation model simulations.
- Estimation of the BOY using historical groundwater elevation measurements and extraction reporting.
- Development of a new numerical groundwater flow model for the WLPMA.

[1] *Las Posas Valley Water Rights Coalition v. Fox Canyon Groundwater Management Agency. Case No. VENCI00509700* (Judgment) defines the Basin Optimization Yield as, "the estimated yield that is projected to be available to achieve sustainable groundwater management by 2040.[…] The Basin Optimization Yield will take into account: (i) water available from native groundwater inflows; (ii) Return Flows; (iii) reasonably anticipated enhanced yield (*i.e.,* managed replenishment excluding water stored and dedicated to the Calleguas ASR Project) projected to be available by Water Year 2040 consistent with the projected Basin Optimization Plan; and (iv) opportunities for optimization of the Sustainable Yield achieved by relocating Extraction and transmission of water to avoid Undesirable Results. The Basin Optimization Yield will also, through Adaptive Management, take into account circumstances including: (a) improved understanding of Basin conditions and hydrogeologic parameters as a result of new data over time; (b) the current status of Basin Optimization Projects; and (c) changing hydrological conditions".

The first two alternate approaches were estimated to have a 3- to 6-month impact on the schedule, resulting in a completion date for the BOY Study in spring or summer of 2026. The third alternative was estimated to impact the study completion by 18- to 24-months. These potential alternatives were reviewed by the Technical Advisory Committee (TAC), which agreed with the general estimates of the schedule impacts for each alternative. TAC noted that the third alternative would cost the most and that the schedule impact was likely conservative. However, TAC communicated to the Watermaster that additional information regarding the three alternatives was necessary to provide recommendations regarding the preferred alternative.

The Watermaster requested additional information on the alternatives outlined above, as well as a recommendation from Dudek on the preferred approach to completing the BOY Study. The Watermaster also requested a revised schedule based on the preferred approach. This memo provides the information requested by the Watermaster, with one notable substitution. Dudek does not recommend further pursuit of constructing a new model for this BOY Study because of the high cost and substantial impacts to the schedule. Therefore, construction of a new model has been replaced by an alternative in which Dudek conducts the numerical groundwater modeling of the WLPMA using model files provided to the Watermaster by UWCD. These model files were used to evaluate future conditions in the LPV Basin as part of the Periodic Evaluation of the LPV Basin Groundwater Sustainability Plan and submitted to Watermaster by UWCD as a deliverable in accordance with the contract between Watermaster and UWCD.

The alternative approaches, the preferred approach, and the revised schedule are discussed below.

Alternative Approaches

Alternative 1: Estimation of the BOY Using the GSP Evaluation Model Runs

The Periodic Evaluation of the GSP included five model scenarios that used UWCD's Updated Coastal Plain Model that covers the entirety of the WLPMA, Oxnard Subbasin, and Pleasant Valley Basin. These model scenarios provide a range of estimates of the sustainable yield. UWCD provided the Watermaster with the output files from the model scenarios. These files contain the detailed information on the calculated water budget components and change in storage during the model run. They also contain the simulated groundwater elevations at each model cell for each stress period of the model run.

Under this alternative, Dudek would use the output files provided by UWCD to develop correlations between the water budget components and the groundwater elevations simulated in the various scenarios. These correlations would then be used to estimate the anticipated groundwater elevations at individual wells in the WLPMA under the Operating Yield of 40,000 AFY, based on the distribution of groundwater production in the allocation schedule. The impact of projects would be evaluated by changing the pumping distribution in the WLPMA from the Future Baseline with Projects Scenario modeled in the Periodic Evaluation of the LPV Basin GSP. The correlations would be mapped onto the spatial change in pumping distribution and the resulting predicted groundwater elevations would be compared to those in the baseline analysis. If the estimated groundwater elevations in the project pumping scenario are below the minimum threshold groundwater elevations, up to three additional reduced pumping scenarios would be evaluated using this method, with the goal of estimating the BOY through predicted final groundwater levels that remain above the minimum thresholds. The difference between the operating yield and the highest estimated groundwater production rate that avoids undesirable results will be used as the basis for the Rampdown Rate calculation set forth in the Judgment.

We note that this alternative does not involve running the UWCD model. The intent of this alternative was to provide a method of estimating the BOY if UWCD did not contract with the Watermaster to run the model and did not provide the model files to the Watermaster under its contract with the FCGMA for the GSP evaluation. There are several notable limitations of this proposed alternative, three of which are listed below:

- There is no guarantee that the variables would be correlated well enough to allow for estimation of the BOY beyond what was already done for the Periodic Evaluation of the LPV Basin GSP. Therefore, this analysis may not yield results that the Watermaster would be able to use to calculate the Rampdown Rate with certainty.
- Even if the correlations are strong, these correlations of the model outputs are farther removed from the actual groundwater conditions than the numerical model.
- This method is not well suited to capturing spatial variability in groundwater conditions, particularly when projects are implemented because the correlations include built in assumptions on groundwater flow direction and storage change from the specific numerical model runs on which they are based. The basis for the correlations with projects, would be the Future Baseline with Projects Scenario. However, changing the pumping distribution will impact groundwater flow in ways that may not be captured in this alternative.

Because UWCD, under its contract with the FCGMA for the GSP evaluation, provided the Watermaster with the model files necessary to run scenarios with UWCD's Updated Coastal Plain Model and because of the limitations listed above, Dudek does not recommend that the Watermaster use this alternative to proceed with development of the BOY and the determination of the Rampdown Rate.

Alternative 2: Estimation of the BOY Using Historical Groundwater Elevation Measurements and Extraction Reports

Similar to Alternative 1, this alternative involves correlating groundwater elevations to components of the water budget. The primary difference between these two alternatives, however, is that this alternative would use observed historical data to develop these correlations, not the results of the numerical groundwater model simulations. Under this alternative, Dudek would review historical changes in groundwater elevations across the monitoring network of groundwater wells in the WLPMA. Observed groundwater elevation changes would be compared to historical water budget inputs (e.g., precipitation, UWCD diversions and recharge operations) and outputs (e.g., groundwater production, and subsurface flows estimated by groundwater gradient) quantified in the GSP for the LPV Basin. Depending on the complexity of the observed relationships, additional statistical reduction of the number of controlling factors may be applied via principal component analysis.

As with Alternative 1, the correlations developed from the historical data would be used to estimate the groundwater elevations at individual wells in the WLPMA under the Operating Yield of 40,000 AFY, based on the distribution of groundwater production in the allocation schedule, and the impact of projects would be evaluated by changing the pumping distribution in the WLPMA. Up to three additional reduced pumping scenarios would be evaluated, with the goal of estimating the BOY through predicted final groundwater levels that remain above the minimum thresholds. The difference between the operating yield and the highest estimated groundwater production rate that avoids undesirable results will be used as the basis for the Rampdown Rate calculation set forth in the Judgment.

The benefit of this alternative relative to alternative 1 is that the correlations are developed from observed data, rather than simulated data. This means there is one less step in the abstraction from the actual groundwater conditions. However, in addition to the limitations listed in alternative 1, which this alternative shares, the distribution of wells with historical observations that can be used to develop correlations is likely to be sparser in this alternative. Consequently, estimating the impacts of projects on groundwater elevations throughout the WLPMA would be challenging.

Because the Watermaster now has the model files necessary to run scenarios with UWCD's Updated Coastal Plain Model and the limitations listed above, Dudek does not recommend that the Watermaster use this alternative to proceed with development of the BOY and the determination of the Rampdown Rate.

Alternative 3: Estimation of the BOY Using the UWCD Periodic Evaluation Model Files to Run New Scenarios

UWCD provided the Watermaster with the numerical groundwater model files developed for the Periodic Evaluation as a deliverable under the contract between FCGMA and UWCD to conduct the numerical modeling for the Periodic Evaluation of the LPV Basin GSP. Under this alternative, Dudek would use those files to prepare, run, and analyze up to five model scenarios for the WLPMA using the version of UWCD's Updated Coastal Plain Model used for the Periodic Evaluation. The five model scenarios are:

1. A baseline scenario
2. A projects scenario
3. Up to three alternative pumping scenarios

The baseline scenario would simulate groundwater conditions in the WLPMA through water year 2069 using the hydrologic period from 1930-1979, modified by DWR's 2070 central tendency climate change factors. Groundwater withdrawals in the baseline model scenario would be set equal to the allocations in the Groundwater Allocation Schedule prepared in accordance with the Water Right Holders in the WLPMA. The baseline model scenario would not include projects identified in the Basin Optimization Plan.

To evaluate the benefits of implementing basin optimization projects, the projects scenario would integrate projects that were identified in the Draft Basin Optimization Plan as being practical, reasonable, and cost-effective to implement prior to 2040 using the same hydrology and groundwater pumping as the baseline scenario. Projects would be simulated according to the schedules and scales defined in the Draft Basin Optimization Plan. Groundwater budgets, the change in groundwater in storage, and groundwater levels at key wells simulated in the projects scenario would be compared to those simulated in the baseline scenario in order to provide a quantitative estimate of Basin Optimization Project benefits.

If the Basin Optimization Projects do not avoid undesirable results in the WLPMA, up to three additional model scenarios would be evaluated to define a groundwater production rate that avoids undesirable results. These model runs would incorporate the same Basin Optimization Projects as the Projects scenario. The difference between the operating yield and the highest simulated groundwater production rate that avoids undesirable results would be used as the basis for the Rampdown Rate calculation set forth in the Judgment.

This alternative also has several limitations that the Board, TAC, and Water Right Holders should be aware of. Four critical limitations are:

- UWCD has not yet published documentation for the Updated Coastal Plain model at this time. The last model documentation was published in 2019 at the time the LPV Basin GSP was prepared. Therefore, without updated information, Dudek is unable to assess the totality of the changes that were made to the model since the last model documentation was published in 2019. Consequently, Dudek would be able to run the model and analyze the output files but has not been provided with sufficient background information to fully understand all the model behavior with respect to the LPV Basin. There may be questions that arise from the results of the model simulations that Dudek is unable to answer without additional information.
- UWCD's Surface Water Distribution Model is not publicly available. Therefore, Dudek would not be able to update the representation of conjunctive use and groundwater pumping within the Oxnard Subbasin and Pleasant Valley Basin. If UWCD were running the Updated Coastal Plain model directly, it would be able to update the Surface Water Distribution Model.
- During development of the Periodic Evaluation of the LPV Basin GSP, Dudek identified that UWCD had changed the representation of the Somis Fault on the eastern boundary of the WLPMA from a no-flow boundary to a general head boundary. As a result, the Updated Coastal Plain Model simulated subsurface flows from the WLPMA to the ELPMA in the Periodic Evaluation of the LPV Basin GSP. These flows may increase as projects are implemented or groundwater production is reduced in the model. However, changes to this model boundary would require a re-calibration of the model. Without the complete model documentation and given the timeframe for completing the BOY Study before the start of the LPVB 2026 Water Year in October 2026, Dudek would be unable to change any parameters that would result in the need to recalibrate the Updated Coastal Plain model.
- Without the complete model documentation for changes made since 2019, andp given the timeframe for completing the BOY Study before the start of the LPVB 2026 Water Year in October 2026, Dudek would also be unable to conduct a model validation or uncertainty quantification for the BOY Study.

Although the limitations of this alternative are serious, and Dudek would have preferred that the UWCD staff who built and calibrated Updated Coastal Plain Model conduct the modeling for the BOY, Dudek believes that this alternative uses the best available tool for evaluating the impact of changes to groundwater production rates on groundwater conditions in the WLPMA. Therefore, this is Dudek's recommended alternative.

Revised Schedule

Watermaster Board approved Dudek's scope and schedule for the preparation of the BOY Study at its October 23, 2024, meeting. The schedule, which ended with completion of the BOY Study in December 2025, assumed that UWCD would conduct the numerical groundwater modeling for the WLPMA. The initial tasks that did not rely on UWCD modeling are well underway or have been completed. However, modeling of the baseline scenario was supposed to begin on February 25, 2025, and be completed by March 25, 2025. This modeling has not yet begun because of the ongoing uncertainty surrounding the numerical groundwater modeling of the WLPMA.

The delay in starting the baseline model impacts the entire BOY Study schedule, as the remaining tasks depend on completion of this task. Dudek has prepared a revised schedule (Table 1) that assumes PAC and TAC will require time to review the proposed alternatives and prepare recommendation reports. Under this schedule, the recommendation reports and the Watermaster response report will be presented to the Watermaster Board for consideration at the May 28, 2025 meeting. If the Watermaster Board approves the recommended approach for Dudek to conduct the numerical groundwater analysis of the WLPMA using UWCD's Updated Coastal Plain model,

Dudek will begin the baseline modeling beginning on June 2, 2025, the Monday following the May 28 Board meeting. This schedule is longer than the previously approved schedule primarily because of the timing of consultations with the TAC and the Watermaster Board. Under this schedule, the BOY Study will be completed in May 2026, assuming that the data needed to conduct each task in the study are provided by the start date of the task and that the meeting dates for committee consultation and Board review are met. Changes to the consultation dates or the length of time required for committee review will impact the schedule.

Table 1. Revised Schedule for Preparation of the BOY Study

Description	Duration	Original Schedule Date	Revised Schedule Date
Task 1 - Model Scenario Development			
Presentation of Proposed Model Scenarios to TAC	6	1/7/2025	-
TAC Recommendation Report	14	1/21/2025	-
Watermaster Response Report	14	2/4/2025	-
Recommendation & Response Reports discussed by WM Board at special meeting.	10	2/14/2025	-
Task 2 - Numerical Modeling[1]			
Task 2.1 - Baseline Scenario	21	2/25/2025	6/2/2025 (s)
Task 2.2 - Projects Scenario	28	3/25/2025	6/23/2025 (s)
TAC review of Baseline and Projects	7	4/1/2025	8/5/2025 (m)
TAC Recommendation Report	21	4/22/2025	8/26/2025 (d)
Watermaster Response Report	21	5/13/2025	9/16/2025 (d)
Recommendation & Response Reports discussed by WM Board	15	5/28/2025	9/24/2025 (m)
Task 2.3 - Model Alternative Pumping Scenarios	30	6/27/2025	10/25/2025 (d)
Task 4 - Basin Optimization Yield Study			
Task 4.1 - Draft BOY Study	45	8/11/2025	12/9/2025 (d)
PAC & TAC Recommendation Reports	60	10/10/2025	2/7/2026 (d)
Watermaster Response Report & revised draft BOY Study	21	10/31/2025	2/28/2026 (d)
Recommendation & Response Reports discussed by Watermaster Board; Board provides direction on revised draft BOY Study	26	11/8/2025	3/25/2026 (m)
Task 4.2 - Final BOY Study development following Watermaster Board review	28	12/6/2025	4/22/2026 (d)
Watermaster Board Approval of Final BOY Study	28	12/12/2025	5/27/2026 (m)

1) Task 3 is now part of Task 2 since UWCD declined to conduct WLPMA modeling under contract with the Watermaster.
2) '-' No need for revised schedule because the event has already occurred.
3) Gray text dates can no longer be achieved under the delayed schedule.
4) (s) Start date
5) (d) Deliverable date
6) (m) Meeting date

Dudek understands that Water Right Holders in the LPV Basin require as much advance notice as possible to prepare for allocation rampdowns. This schedule provides the final Rampdown Rate calculation to the Watermaster Board for approval four months before the start of the LPVB 2026 water year.

Conclusions

UWCD's inability to conduct the numerical model simulations for the WLPMA has forced the Watermaster to explore alternative methods for calculating the BOY and has impacted the schedule for calculating the Rampdown Rate and completing the BOY Study. Of the three alternatives discussed in this memo, Dudek recommends running the UWCD Updated Coastal Plain model using the model files used for the Periodic Evaluation of the GSP provided by UWCD as deliverable required under the contract with FCGMA. While this approach has limitations that are discussed above, it will provide the most quantitative estimate of the BOY and uses the best available tool for investigating impacts to groundwater conditions under different groundwater production scenarios. If the Watermaster chooses to proceed with this alternative, and the deadlines provided in Table 1 for task completion and committee consultation are met, the BOY Study should be completed by May 2026, four months before the start of the LPVB 2026 water year.

Please do not hesitate to contact me (760-479-4116) if you have questions or would like to discuss Dudek's recommended approach further.

Sincerely,

Jill Weinberger, PhD, PG
Principal Hydrogeologist

TO: **Las Posas Valley Watermaster**

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

RE: **Recommendation Report – BOYS Preferred Modeling Alternative and Impacts to Schedule**

DATE: **May 15, 2025**

Dear Las Posas Valley Watermaster,

The Las Posas Valley Watermaster Policy Advisory Committee (PAC) provides this Recommendation Report on the **Basin Optimization Yield Study (BOYS) Preferred Modeling Alternative and Impacts to Schedule**.

Recommendation:
See memo below for recommended course of action**.**

Policy Rationale for Recommendation:
See memo below for rationale.

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

Tally of Committee Member Votes:

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

Report of Bases for Majority and Minority Committee Member Positions:

PAC Recommendation Report Regarding the BOYS Preferred Modeling Alternative and Impacts to Schedule

Regarding the Watermaster's April 3, 2025 memo on preferred modeling alternative and impacts to schedule of the Basin Optimization Yield Study, the PAC concurs with the Watermaster and Dudek that the alternative providing for the use of the *Estimation of the BOY Using the UWCD Periodic Evaluation Model Files to Run New Scenarios* is the most favorable approach.

The PAC recognizes that the BOYS will be an important management tool for the Watermaster and will aid in the development of a groundwater extractions ramp-down scheme that has the potential to impact all stakeholders in the basin. With that understanding, the PAC would prefer the model used for the BOYS not be just "good enough" or what's most expedient but rather be based on the latest understanding of the hydrogeologic conditions in the basin.

The PAC has considered the pros and cons of using the *UWCD Periodic Evaluation Model Files* in the BOYS and would like to explore the potential of augmenting that approach to better address the key policy questions facing the PAC and Watermaster. Committee members debated the merits of using the periodic evaluation model files without modification and alternatively augmenting those model files to address key concerns recognized during the preparation of the 5-Year Periodic Evaluation.

The creation of a completely new groundwater model for the WLPMA was determined to be a costly alternative and had unacceptable impacts to the timeline for completion of the BOYS. However, using the pre-existing model files provides a major jumpstart to the modeling effort. The PAC would like to explore the cost and schedule impacts to upgrading the periodic model to address the following topics:

- Extension of the modeling period to 2024 (instead of 1979)
- The Somis fault was changed from a NO FLOW to GENERAL HEAD BOUNDARY for the periodic evaluation, but the model was not recalibrated. In-lieu water delivery projects are proposed in the vicinity of that fault and a more refined understanding of how the water levels would respond with these revised assumptions about the fault are important.
- Perform the model recalibration, as well as the model validation, sensitivity, and uncertainty analyses needed to support the model. The Dudek memorandum dated March 31, 2025 reported that the necessary documentation of the periodic evaluation model was not available. The PAC recommends that this deficiency be eliminated for any model used in the BOYS. These technical evaluations of the model can make the process of fostering stakeholder acceptance a more straightforward endeavor.

Receiving this additional information will help the Watermaster make a more informed decision about the tradeoffs between advancing the study with Dudek and waiting for United to contract to do the modeling.

May 9, 2025

REVISED 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 – Preferred Modeling Alternatives and Impacts to Schedule, Basin Optimization Yield Study

The Las Posas Valley Watermaster Technical Advisory Committee (TAC) provides this Recommendation Report regarding the Basin Optimization Yield Study Preferred Modeling Alternatives and Impacts to Schedule. This Recommendation Report was prepared in response to the Las Posas Valley Basin Watermaster (Watermaster) committee consultation request transmitted to the TAC on April 3, 2025.

BACKGROUND

The Watermaster requested TAC consultation on a preferred alternative method to assess basin yield optimization in the BOYS. The Las Posas Valley Adjudication judgment requires preparation of a Basin Optimization Yield Study (BOYS) to evaluate Basin Optimization Yield, set the Operating Yield, and identify the need for and quantification of the rate of pumping rampdown to achieve sustainable groundwater management by 2040. The Watermaster originally planned to use the two groundwater models to simulate conditions related to optimization in the east and west management areas of the Las Posas Valley Basin (LPVB). However, the model for the West Las Posas Management Area (WLPMA) was developed and is maintained by United Water Conservation District (UWCD). The Watermaster attempted to develop an agreement with UWCD to facilitate UWCD's services in applying their model to simulate yield optimization scenarios. The Watermaster has reported that an agreement for this purpose could not be reached and alternatives to the original approach must be implemented.

The Watermaster informed the TAC in a December 23, 2024 memorandum that another technical approach may be required. That memorandum also identified three potential alternatives, which were:

(i) Estimating the Basin Optimization Yield and Rampdown using Groundwater Sustainability Plan (GSP) periodic evaluation model simulations

(ii) Estimating the Basin Optimization Yield and Rampdown using historical groundwater elevation measurements and extraction reports
(iii) Developing a new numerical groundwater flow model for the WLPMA.

In early 2025, the Watermaster removed the new numerical model development alternative (iii above) from consideration due to the associated schedule impacts. The Watermaster and its consultant, Dudek, have also identified an additional alternative, described as estimating the Basin Optimization Yield using the model provided by UWCD as part of the LPVB GSP Periodic Evaluation completed in 2025.

The Watermaster Board of Directors asked Dudek to review and select its preferred modeling alternative and submit its analysis to the LPV Policy Advisory Committee (PAC) and TAC for consultation. Dudek analyzed the modeling alternatives and their respective impacts to the BOYS schedule and identified the recently developed alternative that would use the model scenario provided by UWCD as part of the Periodic Evaluation as the preferred alternative. Dudek has estimated inclusion of this alternative would result in the BOYS being completed in April 2026 for adoption at the May 2026 Watermaster Board of Directors meeting. Dudek presented the alternative BOYS approaches and their preferred alternative in a letter titled *Basin Optimization Yield Study Alternative Approach, Scope, and Schedule Impacts* dated March 31, 2025.

The Watermaster requested the TAC specifically consider and provide consultation on the following topics:

1. Should the Watermaster use the UWCD Periodic Evaluation model files to run scenarios for preparation of the Basin Optimization Yield Study rather than estimating the Basin Optimization Yield and Rampdown (i) using GSP periodic evaluation model simulations or (ii) using historical groundwater elevation measurements and extraction reports?
2. Is the schedule to implement the alternative in (1) and complete the Basin Optimization Yield Study in April 2026 for adoption at the May 2026 Watermaster Board of Directors meeting, approximately four months before the start of Water Year 2026 (October 1, 2026 through September 30, 2027), a reasonable alternative for timely completion of the Basin Optimization Yield Study?

The TAC considered the BOYS preferred modeling alternative and schedule impacts in a regular TAC meeting on April 15, 2025 and again on May 6, 2025. TAC comments on the BOYS preferred modeling alternative and schedule were discussed in those meetings and are summarized in this Recommendation Report.

The TAC reviewed this Recommendation Report and voted to approve it in a special meeting on May 9, 2025.

COMMENTS

The TAC would also like to express gratitude to the Watermaster for working diligently to develop an agreement with UWCD to access and use the current version of the Coastal Plain groundwater model and to Watermaster staff and Dudek for identifying this alternative. The proposed approach preserves the original technical methodology for basin optimization and maintains consistency with the GSP and other analyses that also employed the two models representing the LPVB.

However, the TAC has concerns that the model scenario provided by UWCD as part of the Periodic Evaluation does not accurately represent the conceptual model of the boundary between the WLPMA and East Las Posas Management Area (ELPMA). The TAC is also concerned that criteria for evaluating the project and/or alternative model scenarios have not been described for review by the TAC. The TAC views resolution of the recommendations presented below as critical requirements that should be addressed before BOYS simulations are undertaken.

TAC RECOMMENDATIONS

1. RECOMMENDATION 1: CONSIDER ADDRESSING THE SOMIS FAULT REPRESENTATION IN THE COASTAL PLAIN MODEL BEFORE PERFORMING BASIN OPTIMIZATION YIELD MODEL SIMULATIONS

As described in TAC comments and recommendations on the Draft First Periodic Evaluation, Groundwater Sustainability Plan for the Las Posas Valley Basin (Draft GSP Evaluation) (*TAC Consultation Recommendation Report, Draft First Periodic Evaluation, Groundwater Sustainability Plan for the Las Posas Valley Basin*, dated October 10, 2024), modifications to the version of the Coastal Plain model used in the GSP Evaluation to simulate conditions in the WLPMA included a significant change to the boundary condition used to represent the Somis Fault. This fault, which separates the WLPMA from the ELPMA, was changed from a no-flow boundary condition to a partial general head boundary condition. This change means the Coastal Plain Model used for the Draft GSP Evaluation and proposed for use in the BOYS optimization simulations allows flow from the WLPMA to the ELPMA. The average annual flow rate from the WLPMA to the ELPMA from 2016 to 2022 presented in the GSP Evaluation was 832 acre feet per year, which represents slightly less than 17 percent of the change in groundwater storage in the WLPMA during the period.

As the TAC has noted in our October 10, 2024 Recommendation Report, the Draft GSP Evaluation indicates that the limited groundwater elevation information in this area of the LPVB implies there is little groundwater flow across the Somis Fault. In addition, local groundwater gradients suggest that if flow occurs it would be from ELPMA to WLPMA. In response to this comment, the Watermaster indicated the TAC recommendations were forwarded to UWCD and that:

> "UWCD is currently working on the supplemental documentation to cover the changes made since the GSP. As of the time this response report was prepared, UWCD had not yet provided a date when the supplemental documentation will be made available."

Unfortunately, such supplemental documentation is still not available.

The TAC further recommended in October 2024 that the Watermaster

> "Advance the coordination with UWCD and the TAC to develop agreement on the representation of this boundary in the two models. The coordination of this boundary between the two models should not wait until after the GSP is amended. The analyses in the amended GSP should be consistent with the Basin Optimization Yield Study."

While use of the GSP periodic evaluation model simulations as suggested in the preferred alternative for yield optimization in the WLPMA is consistent with the GSP periodic evaluation, the TAC has significant concerns over the representation of the Somis Fault in that model. The TAC is specifically concerned that the apparent conflict between the groundwater flow direction and magnitude of average annual flow in the GSP periodic evaluation model simulations and the observed water levels and groundwater gradients in this area indicate the model is an inappropriate tool for simulating future conditions with changed management and the addition of projects designed to increase groundwater storage and elevations in the WLPMA.

1.1 Recommendations:

The TAC recommends that Watermaster and their consultant Dudek evaluate and report back to the TAC if the GSP periodic evaluation model simulation files currently in their possession could be used to assess and quantify the potential impacts to available water supply in the WLPMA given the apparent groundwater flow direction discrepancy between the Coastal Plain model and observed local groundwater conditions around the Somis Fault boundary between the WLPMA and ELPMA.

1.2 Technical Rationale for Recommendation:

As stated above, the TAC is concerned that groundwater flow direction in the GSP periodic evaluation model simulations is from the WLPMA to the ELPMA and the observed water levels and groundwater gradients in this area indicate the actual flow, if it occurs, would be from the ELPMA to the WLMPA. Simulating future conditions with projects in the WLPMA intended to increase groundwater elevations and storage in that management area would likely simulate increased flow across the Somis Fault in the model. This would mean that the simulated conditions would show less benefit to water levels and storage in the WLPMA than would be expected in reality. Given the conceptual model and local observations relating to the effect of the Somis Fault on groundwater flow it is likely that increased groundwater elevations and storage in the WLPMA would have little effect on flow between the WLPMA and ELPMA. In fact, if the Somis Fault does present a barrier to horizontal flow

of groundwater it would cause groundwater to mound higher on the western side of the Fault in response to WLPMA projects that increase groundwater elevations and storage.

1.3 Summary of Facts in Support of Recommendation:

- The GSP periodic evaluation model simulations appear to misrepresent the direction of groundwater flow across the Somis Fault at the boundary between the WLPMA and ELPMA.
- Using a model that misrepresents boundary conditions for predictive simulations, optimization of yield, and reduction in pumping allocations is likely to result in significant errors that risk either over or underestimating the effectiveness of projects and changes in groundwater pumping, especially close to the boundary in question.

2. RECOMMENDATION 2: CLARIFY WHAT CRITERIA WILL BE USED TO ASSESS UNDESIRABLE RESULTS IN THE WLPMA WHEN COMPARING BASIN OPTIMIZATION YIELD STUDY PROJECT AND ALTERNATIVE PUMPING SCENARIOS TO THE BASELINE SCENARIO

In the October 10, 2024 Recommendation Report on the Draft GSP Periodic Evaluation, the TAC also commented on the relationship between the Oxnard Subbasin and sustainability in the WLPMA. In that comment, the TAC expressed concern that the methodology used to assess the effects of pumping in the WLPMA on seawater intrusion in the Oxnard Subbasin did not effectively isolate the effects of changes in pumping in WLPMA on conditions in the Oxnard Subbasin. As pointed out in our October 10, 2024 Recommendation Report:

> "The Draft GSP Evaluation presented model scenarios that included simultaneous changes in pumping volumes in the WLPMA, both Oxnard aquifers, and the Pleasant Valley Basin. The results of these simulations were then compared to a baseline scenario and the changes to simulated seawater intrusion in the Oxnard Subbasin were used to evaluate effects on sustainable yield in the WLPMA. However, the changes to pumping volumes in the scenarios appeared to be relatively arbitrary and the TAC is concerned that the resulting sustainable yield estimates for the WLPMA are similarly arbitrary."

The TAC recommended development of model scenarios designed to limit changes between compared simulations to single variables to isolate the impacts of those variables on sustainability. To the TAC's knowledge isolated variable model simulations for this purpose have not been completed to date.

Given this uncertainty, the TAC recommends the Watermaster and Dudek clarify what criteria will be used to assess the presence of undesirable results in the WLPMA when comparing the projects and alternative pumping scenarios to the baseline scenario.

2.1 Recommendations:

Clarify what criteria will be used to assess undesirable results conditions in the WLPMA when comparing the projects and alternative pumping scenarios to the baseline scenario. The TAC is specifically interested in understanding if simulated effects on seawater intrusion conditions in the Oxnard Subbasin will be used as a component of the criteria for assessing undesirable results, or if comparisons of simulated conditions within the WLPMA will be the sole criteria.

2.2 Technical Rationale for Recommendation:

The presentation of the preferred alternative for basin optimization yield estimation indicated:

> "Groundwater budgets, the change in groundwater storage, and groundwater levels at key wells simulated in the projects scenario would be compared to those simulated in the baseline scenario in order to provide a quantitative estimate of Basin Optimization Project benefits."

And

> "If the Basin Optimization Projects do not avoid undesirable results in the WLPMA, up to three additional model scenarios would be evaluated to define a groundwater production rate that avoids undesirable results"

While these statements appear to indicate that the assessment of undesirable results will be limited to conditions in the WLPMA the specific metrics that will be used for assessing undesirable results have not been presented.

2.3 Summary of Facts in Support of Recommendation:

- Previous model scenarios used to estimate available yield in the WLPMA have used simulated seawater intrusion conditions in the Oxnard Subbasin as the metric for assessment of undesirable results and these simulations combined variables making it impossible to evaluate the effects of changes in management of the WLPMA in isolation.
- The presentation of the proposed approach to estimating basin optimization yield in the WLPMA to date has not included details of the proposed methodology for assessing undesirable results.

3. RECOMMENDATION 3: PREEMPTIVELY CONSIDER WHAT INFORMATION FROM THE BASIN OPTIMIZATION MODEL SCENARIOS CAN BE SHARED WITH THE TAC AND OTHER INTERESTED PARTIES

The Watermaster informed the TAC that some information from the model that they and Dudek plan to use for the basin optimization assessments of the West Las Posas Management Area (WLPMA) are subject to a protective order in the Oxnard Subbasin and Pleasant Valley Subbasin (OPV) Adjudication. Specifically:

> Some of the model files that Watermaster will use to prepare the LPV basin optimization yield study (specifically in the West Las Posas Management Area) include files received from United Water Conservation District. These files and the information embedded in them may be subject to a protective order in the OPV Adjudication. Requests for access to or disclosure of those files will be reviewed against that protective order by FCGMA [Fox Canyon Groundwater Management Agency] counsel on a case-by-case basis.

In reviewing the scope of work for the BOYS, the TAC requested additional time and consultation to allow opportunities to receive and review information from the optimization model scenarios. The uncertainty regarding the TAC's ability to review information from the WLPMA optimization modelling concerns the TAC. As a means of avoiding this uncertainty and delays associated with legal review of requests for model information, the TAC proposes to provide test case requests for types of information for Watermaster counsel to review before the optimization modeling of the WLPMA is complete.

3.1 Recommendations:

The TAC specifically recommends that Watermaster staff and legal counsel consider whether information including but not limited to those listed below can be provided from the Coastal Plain model simulations planned for assessing basin optimization yield from the WLPMA.

- Time series datasets showing comparison of model inputs representing simulation of project and alternative pumping scenarios to the baseline scenario.
- Time series of simulated head data at key wells and other important locations for baseline, project, and alternative pumping scenarios.
- Total and zonal water budgets for the entire model area, portions of the model area, boundaries at the edges of the model, and boundaries between specific portions of the model for the baseline, projects, and alternative pumping scenarios.
- Total and zonal water budgets for the WLPMA portion of the model area, zones within the WLPMA portion of the model area, boundaries at the edges of the WLPMA within the model, and boundaries between specific portions of the WLPMA model for the baseline, projects, and alternative pumping scenarios.

3.2 Technical Rationale for Recommendation:

The schedule for completion of the BOYS does not allow for delays and the TAC may require specific technical information from the model scenario simulations planned and completed for testing optimal yield from the WLPMA. Given that some of the information within the Coastal Plain model that includes the WLPMA may be protected under the OPV Adjudication, it is appropriate for Watermaster legal counsel to consider what specific information can and cannot be shared with the TAC before the request for committee consultation is sent to the TAC.

3.3 Summary of Facts in Support of Recommendation:

- The TAC is the technical representative of the Watermaster providing expertise in evaluation of technical and scientific assessments relating to the LPVB.

- Review of comparative groundwater management scenarios simulated using numerical groundwater models typically includes detailed evaluation of model inputs, results, outputs, and statistics.
- In order to provide appropriate technical review and recommendations to the Watermaster, the TAC should know what information it can expect to have access to with as much advanced notice as possible.

TALLY OF COMMITTEE MEMBER VOTES

The TAC voted to approve the content of this Recommendation Report and authorize the TAC Administrator to submit it to the Watermaster in a meeting held May 9, 2025. The vote was unanimous, as shown below.

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

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. No minority positions were expressed by voting or non-voting TAC members.

DRAFT LAS POSAS VALLEY WATERMASTER RESPONSE REPORT

Date: June 9, 2025

To: Las Posas Valley Watermaster Board of Directors

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

Re: Response Report to PAC Consultation Recommendation Report, BOYS Preferred Modeling Alternative and Impacts to Schedule

In a March 31, 2025, memo, the Las Posas Valley Watermaster (Watermaster) consultant outlined three potential approaches to calculating the Basin Optimization Yield (BOY) and described the anticipated schedule impacts for each approach. Of the three approaches outlined in the March 31 memo, Watermaster's consultant recommended calculation of the BOY using the United Water Conservation District (UWCD) model files developed for the Periodic Evaluation of the Groundwater Sustainability Plan for the Las Posas Valley Basin (Periodic Evaluation). Under the schedule proposed in the memo, the development of the Draft BOY Study is anticipated to be completed by December 2025 and the final BOY Study is anticipated to be completed by May 2026.

On April 3, 2025, Watermaster requested consultation from the Las Posas Valley Policy Advisory Committee (PAC) on:

1) Preferred Alternative. Whether Watermaster should use the UWCD Periodic Evaluation model files to run scenarios for preparation of the Basin Optimization Yield Study rather than estimating the Basin Optimization Yield and Rampdown (i) using GSP periodic evaluation model simulations or (ii) using historical groundwater elevation measurements and extraction reports?

2) Schedule Impact. Whether using the UWCD Periodic Evaluation model files to complete the Basin Optimization Yield Study in April 2026 for adoption at the May 2026 Watermaster Board of Directors meeting, approximately four months before the start of Water Year 2026 (October 1, 2026, through September 30, 2027), is a reasonable alternative for timely completion of the Basin Optimization Yield Study?

The PAC discussed Watermaster's requests for consultation and the March 31 Preferred Modeling Approach Memorandum at its April 17, 2025, May 1, 2025, and May 15, 2025, meetings.

PAC's May 15, 2025, recommendation report concurs with the recommended approach in the March 31 memo: "the PAC concurs with the Watermaster and Dudek that the alternative providing for the use of the *Estimation of the BOY Using the UWCD Periodic Evaluation Model Files to Run New Scenarios* is the most favorable approach." But PAC's recommendation

report also requests additional information on the cost and schedule impacts to "upgrading the periodic model" to address three specific topics. These topics are:

1) Extending the model period to 2024.
2) Understanding the impacts of UWCD's change to the model boundary conditions on simulated water levels in the eastern part of the WLPMA.
3) Recalibrating, validating, and performing sensitivity and uncertainty analyses to support the model.

The PAC recommendation report concludes, "receiving this additional information will help the Watermaster make a more informed decision about the tradeoffs between advancing the study with Dudek and waiting for United to contract to do the modeling." The response to each of PAC's request for more information on potential modifications, or "upgrades," to the UWCD Periodic Evaluation model is discussed below.

Request for Information 1: Extend the model period to 2024 (instead of 1979)
Response to Request for Information 1:
In this request for information, PAC appears to be confusing the period used to simulate future hydrology in the model (1930-1979) with extension of the historical model (1985-2022). UWCD updated the historical Coastal Plain Model period between 2018, when it was used for the Groundwater Sustainability Plan (GSP), and 2024, when it was used for the Periodic Evaluation. The updated historical model was extended to simulate groundwater conditions in the WLPMA through the end of water year 2022 (FCGMA 2025). The simulated groundwater elevations in the historical model can be compared to measured groundwater elevations over the same time period in order to calibrate and validate the model. Watermaster believes that extension of the historical model through 2022 is a reasonable update to the model that captures recent trends in LPV groundwater conditions. Watermaster does not believe that the historical model requires updating through 2024 to be able to conduct the model simulations to assess the BOY.

The Periodic Evaluation simulated potential future groundwater conditions under differing groundwater management frameworks. As required by the Sustainable Groundwater Management Act (SGMA), the future simulations evaluated conditions over a 50-year planning and implementation horizon. Consequently, these simulations must include estimates of future hydrologic parameters, such as precipitation and streamflow. These future estimates can be based on past historical periods or can be constructed from hydrologic modeling, statistical methods, or climate projections. During development of the Groundwater Sustainability Plan (GSP), the FCGMA GSP Technical Advisory Group (TAG) reviewed multiple potential 50-year hydrology options and recommended that the period from 1930 through 1979 should be adopted as the 50-year future hydrology. The Periodic Evaluation adopted the same approach. Watermaster believes that this remains a

reasonable approach for incorporating hydrologic parameters into the future groundwater management scenarios.

Request for Information 2: Refine the understanding of groundwater level responses to simulated projects in the eastern WLPMA.
The Somis fault was changed from a NO FLOW to GENERAL HEAD BOUNDARY for the periodic evaluation, but the model was not recalibrated. In-lieu water delivery projects are proposed in the vicinity of that fault and a more refined understanding of how the water levels would respond with these revised assumptions about the fault are important.

Response to Request for Information 2:
Although UWCD has not yet published updated model documentation detailing the specific changes made to the model between the version used in the GSP and the version used in the Periodic Evaluation, Watermaster understands that the updated model was recalibrated by UWCD before it was used in the Periodic Evaluation (FCGMA 2024). Therefore, Watermaster does not believe that additional calibration is required for use of this model to determine the BOY.

The Periodic Evaluation included a Projects Scenario that is similar to the Projects Scenario that will be conducted for the BOY Study (FCGMA 2024; See Section 5.2.2.1.5). In this scenario, 1,762 AFY of imported water was purchased and delivered to Zone Mutual Water Company and Wateworks District No. 19 in the eastern WLPMA, in lieu of groundwater extraction. In this scenario, simulated water levels at Well 02N20W06R01, which is a key well adjacent to the Somis Fault, rose above the minimum threshold groundwater elevation within the planning and implementation horizon and remained above the minimum threshold groundwater elevation for the remainder of the 50-year predictive model run. Watermaster notes that groundwater elevations at well 02N20W06R01simulated for the Periodic Evaluation Projects Scenario were consistently lower than simulated groundwater elevations at the same well for the GSP Projects Scenario. This difference indicates that simulated groundwater level recoveries are impacted by the modification to the model boundary conditions, but it does not necessarily indicate that the groundwater elevations simulated for the GSP are more accurate than those simulated for the Periodic Evaluation. The discrepancy between the simulated groundwater elevations in the two projects scenarios is a known consequence of the changed boundary condition in the Periodic Evaluation model. Nevertheless, Dudek identified use of the Periodic Evaluation model files to calculate the BOY in the WLPMA as the preferred alternative.

Request for Information 3: Perform the model recalibration, as well as the model validation, sensitivity, and uncertainty analyses needed to support the model. The Dudek memorandum dated March 31, 2025, reported that the necessary documentation of the periodic evaluation model was not available. The PAC recommends that this deficiency be

eliminated for any model used in the BOYS. These technical evaluations of the model can make the process of fostering stakeholder acceptance a more straightforward endeavor.

Response to Request for Information 3:

As noted in Response to Request for Information 2, Watermaster understands that the updated model was recalibrated by UWCD before it was used in the Periodic Evaluation. In order to conduct a model calibration, validation, sensitivity, or uncertainty analysis, Watermaster would need access to the historical model files. After completing the modeling for the Periodic Evaluation, UWCD provided Watermaster with the model files used to simulate potential future groundwater conditions under differing groundwater management frameworks. These files differ from the historical model files, which cover the period from 1985 to 2022. Therefore, Watermaster cannot conduct the additional analyses requested by the PAC.

Conclusion

Under the Judgment, the purpose of the PAC and the Technical Advisory Committee is to "establish a specific and formal process to obtain policy and technical recommendations from stakeholders" (Judgment § 6.2). Watermaster requested review of the preferred approach to completing the BOY Study from both PAC and TAC. PAC "concurs with Watermaster and Dudek that the alternative providing for the use of the Estimation for the BOY Using the UWCD Periodic Evaluation Model Files to Run New Scenarios is the most favorable approach." TAC agrees that "the proposed approach preserves the original technical methodology for basin optimization and maintains consistency with the GSP and other analyses." Therefore, Watermaster has engaged with stakeholders, via the PAC and TAC, to "ensure that decisions by Watermaster are made following full consideration of diverse policy and technical views," consistent with the Judgment (Judgment § 6.2).

Finally, Watermaster must prepare a BOY Study "every five years in coordination with the GSP Updates (Wat. Code, §10728.2) or at Watermaster's discretion in response to material changing or changed Basin Conditions" (Judgment § 1.22). This first BOY Study to be prepared under the Judgment is projected to be completed by spring 2026. The BOY Study schedule has already been delayed five months. Further delaying the completion of the first BOY Study beyond spring 2026 jeopardizes Watermaster's ability to implement management actions to ensure Sustainable Groundwater Management by 2040 (Judgment § 4.10.2).

In the absence of additional material changes to groundwater conditions, Watermaster anticipates that preparation of the second BOY Study would begin in 2028, only two years after completion of the first BOY Study, in order to be completed prior to January 2030 in coordination with the GSP Periodic Evaluation, as required by the Judgment. Changes to the modeling approach can be considered for the 2030 BOY Study.

Completion of the first BOY Study in spring 2026 will allow stakeholders and Watermaster to review the management actions undertaken as part of that study and make any necessary adjustments prior to the second BOY Study. Because the Judgment requires Watermaster to prepare the second BOY Study by January 2030 and allows Watermaster to prepare a BOY Study more frequently, if necessary, Watermaster recommends advancing the first BOY Study using the recommended approach provided in the March 31 memo.

DRAFT LAS POSAS VALLEY WATERMASTER RESPONSE REPORT

Date: June 9, 2025

To: Las Posas Valley Watermaster Board of Directors

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

Re: Response Report to TAC Consultation Recommendation Report, BOYS Preferred Modeling Alternative and Impacts to Schedule

In a March 31, 2025, memo, the Las Posas Valley Watermaster (Watermaster) consultant outlined three potential approaches to calculating the Basin Optimization Yield (BOY) and described the anticipated schedule impacts for each approach. Of the three approaches outlined in the March 31 memo, Watermaster's consultant recommended calculation of the BOY using the United Water Conservation District (UWCD) model files developed for the Periodic Evaluation of the Groundwater Sustainability Plan for the Las Posas Valley Basin (Periodic Evaluation). Under the schedule proposed in the memo, the development of the Draft BOY Study is anticipated to be completed by December 2025 and the final BOY Study is anticipated to be completed by May 2026.

On April 3, 2025, Watermaster requested consultation from the Las Posas Valley Policy Advisory Committee (PAC) on two topics:

1) Should the Watermaster use the UWCD Periodic Evaluation model files to run scenarios for preparation of the Basin Optimization Yield Study rather than estimating the Basin Optimization Yield and Rampdown (i) using GSP periodic evaluation model simulations or (ii) using historical groundwater elevation measurements and extraction reports?
2) Is the schedule to implement the alternative in (1) and complete the Basin Optimization Yield Study in April 2026 for adoption at the May 2026 Watermaster Board of Directors meeting, approximately four months before the start of Water Year 2026 (October 1, 2026 through September 30, 2027), a reasonable alternative for timely completion of the Basin Optimization Yield Study?

The TAC discussed and developed its recommendation report at April 15, May 6, and May 9, 2025, meetings. TAC's May 9, 2025, recommendation report included three recommendations. Each of these recommendations is listed below followed by Watermaster's response.

Recommendation 1: CONSIDER ADDRESSING THE SOMIS FAULT REPRESENTATION IN THE COASTAL PLAIN MODEL BEFORE PERFORMING BASIN OPTIMIZATION YIELD MODEL SIMULATIONS

As described in TAC comments and recommendations on the Draft First Periodic Evaluation, Groundwater Sustainability Plan for the Las Posas Valley Basin (Draft GSP Evaluation) (*TAC Consultation Recommendation Report, Draft First Periodic Evaluation, Groundwater Sustainability Plan for the Las Posas Valley Basin*, dated October 10, 2024), modifications to the version of the Coastal Plain model used in the GSP Evaluation to simulate conditions in the WLPMA included a significant change to the boundary condition used to represent the Somis Fault. This fault, which separates the WLPMA from the ELPMA, was changed from a no-flow boundary condition to a partial general head boundary condition. This change means the Coastal Plain Model used for the Draft GSP Evaluation and proposed for use in the BOYS optimization simulations allows flow from the WLPMA to the ELPMA. The average annual flow rate from the WLPMA to the ELPMA from 2016 to 2022 presented in the GSP Evaluation was 832 acre-feet per year, which represents slightly less than 17 percent of the change in groundwater storage in the WLPMA during the period.

As the TAC has noted in our October 10, 2024 Recommendation Report, the Draft GSP Evaluation indicates that the limited groundwater elevation information in this area of the LPVB implies there is little groundwater flow across the Somis Fault. In addition, local groundwater gradients suggest that if flow occurs it would be from ELPMA to WLPMA. In response to this comment, the Watermaster indicated the TAC recommendations were forwarded to UWCD and that:

> "UWCD is currently working on the supplemental documentation to cover the changes made since the GSP. As of the time this response report was prepared, UWCD had not yet provided a date when the supplemental documentation will be made available."

Unfortunately, such supplemental documentation is still not available.

The TAC further recommended in October 2024 that the Watermaster

> "Advance the coordination with UWCD and the TAC to develop agreement on the representation of this boundary in the two models. The coordination of this boundary between the two models should not wait until after the GSP is amended. The analyses in the amended GSP should be consistent with the Basin Optimization Yield Study."

While use of the GSP periodic evaluation model simulations as suggested in the preferred alternative for yield optimization in the WLPMA is consistent with the GSP periodic evaluation, the TAC has significant concerns over the representation of the Somis Fault in

that model. The TAC is specifically concerned that the apparent conflict between the groundwater flow direction and magnitude of average annual flow in the GSP periodic evaluation model simulations and the observed water levels and groundwater gradients in this area indicate the model is an inappropriate tool for simulating future conditions with changed management and the addition of projects designed to increase groundwater storage and elevations in the WLPMA.

1.1 Recommendations:
The TAC recommends that Watermaster and their consultant Dudek evaluate and report back to the TAC if the GSP periodic evaluation model simulation files currently in their possession could be used to assess and quantify the potential impacts to available water supply in the WLPMA given the apparent groundwater flow direction discrepancy between the Coastal Plain model and observed local groundwater conditions around the Somis Fault boundary between the WLPMA and ELPMA.

Response to Recommendation 1:
Compliance with SGMA and the need to implement management actions that may impact water supply will be determined by measured groundwater elevations at key wells in the Las Posas Valley Basin. As discussed in the GSP, measured groundwater elevations that remain above the minimum threshold groundwater elevations defined at key wells in the eastern WLPMA are sufficient to avoid undesirable results in this portion of the WLPMA. If groundwater elevations fall below the minimum threshold groundwater elevations, additional management actions, including the potential for demand reduction, may be required. Consistent with historical groundwater measurements, both the Groundwater Sustainability Plan (GSP) and the Periodic Evaluation modeling efforts found that implementation of in-lieu surface water delivery projects in the eastern WLPMA is likely sufficient to avoid undesirable results.

The primary difference between the Project model scenarios in the GSP and the Periodic Evaluation is the change in the model boundary condition in the eastern WLPMA. In order to evaluate the potential impact of the model boundary change on water supplies and the potential need to implement additional management actions in the WLPMA, Watermaster compared the groundwater elevation responses simulated in the GSP to those simulated in the Periodic Evaluation.

Simulated groundwater levels for the GSP and Periodic Evaluation Projects scenarios at Well 02N20W06R01, a key well adjacent to the Somis Fault, are indicative of the influence of the model boundary change on the potential simulated influence of projects in the WLPMA. The two Projects scenarios simulated similar reductions in groundwater production in the WLPMA. In both Projects scenarios, groundwater levels rose above the minimum threshold groundwater elevation prior to 2040 and remained above the minimum threshold groundwater elevation for the remainder of the GSP implementation horizon. Watermaster

notes that groundwater elevations at well 02N20W06R01simulated for the Periodic Evaluation Projects Scenario were consistently lower than simulated groundwater elevations at the same well for the GSP Projects Scenario. This difference indicates that simulated groundwater level recoveries are impacted by the modification to the model boundary conditions, but it does not necessarily indicate that the groundwater elevations simulated for the GSP are more accurate than those simulated for the Periodic Evaluation.

Watermaster also compared the simulated flow across the eastern WLPMA model boundary between the Periodic Evaluation Baseline and Projects model scenarios to better understand the magnitude of change in the simulated flow that would result from Project implementation in the model. As expected, the average annual flow leaving the model boundary to the east increased between the Baseline and Projects scenarios in the Periodic Evaluation. The average annual flow leaving the model domain on the eastern boundary of the WLPMA over the 47-year model period, was 885 AFY in the Baseline simulation that incorporated the 2070 DWR climate factors. In the Projects scenario, the average annual flow across the eastern boundary of the WLPMA increased to 1,920 AFY over the 47-year model period. This increase in flow occurred in response to rising groundwater elevations that resulted from: (1) the simulated delivery of surface water to Ventura County Waterworks District 1, in the eastern portion of the WLPMA in lieu of groundwater extraction, and (2) a simulated reduction in groundwater demands for Zone Mutual Water District. The average annual simulated reduction in groundwater production between the Periodic Evaluation Baseline and Projects scenarios is 1,983 AFY.

Watermaster agrees with TAC that this simulated flow is not consistent with the hydrogeologic conceptual model, but notes that groundwater management decisions will be based on observed water levels. Because the Periodic Evaluation model simulates groundwater elevations in the eastern portion of the WLPMA that rise above the minimum threshold prior to 2040 and remain above the minimum threshold for the duration of the model scenario, use of the UWCD model files developed for the Periodic Evaluation remains the best available option to evaluate the BOY and complete this first BOY study prior to the beginning of the 2027 water year (October 1 2026 – September 30, 2027).

Recommendation 2: CLARIFY WHAT CRITERIA WILL BE USED TO ASSESS UNDESIRABLE RESULTS IN THE WLPMA WHEN COMPARING BASIN OPTIMIZATION YIELD STUDY PROJECT AND ALTERNATIVE PUMPING SCENARIOS TO THE BASELINE SCENARIO

In the October 10, 2024 Recommendation Report on the Draft GSP Periodic Evaluation, the TAC also commented on the relationship between the Oxnard Subbasin and sustainability in the WLPMA. In that comment, the TAC expressed concern that the methodology used to assess the effects of pumping in the WLPMA on seawater intrusion in the Oxnard Subbasin did not effectively isolate the effects of changes in pumping in WLPMA on conditions in the Oxnard Subbasin. As pointed out in our October 10, 2024 Recommendation Report:

> "The Draft GSP Evaluation presented model scenarios that included simultaneous changes in pumping volumes in the WLPMA, both Oxnard aquifers, and the Pleasant Valley Basin. The results of these simulations were then compared to a baseline scenario and the changes to simulated seawater intrusion in the Oxnard Subbasin were used to evaluate effects on sustainable yield in the WLPMA. However, the changes to pumping volumes in the scenarios appeared to be relatively arbitrary and the TAC is concerned that the resulting sustainable yield estimates for the WLPMA are similarly arbitrary."

The TAC recommended development of model scenarios designed to limit changes between compared simulations to single variables to isolate the impacts of those variables on sustainability. To the TAC's knowledge isolated variable model simulations for this purpose have not been completed to date.

Given this uncertainty, the TAC recommends the Watermaster and Dudek clarify what criteria will be used to assess the presence of undesirable results in the WLPMA when comparing the projects and alternative pumping scenarios to the baseline scenario.

2.1 Recommendations:

Clarify what criteria will be used to assess undesirable results conditions in the WLPMA when comparing the projects and alternative pumping scenarios to the baseline scenario. The TAC is specifically interested in understanding if simulated effects on seawater intrusion conditions in the Oxnard Subbasin will be used as a component of the criteria for assessing undesirable results, or if comparisons of simulated conditions within the WLPMA will be the sole criteria.

Response to Recommendation 2:
Consistent with the GSP, Watermaster will use groundwater elevations in the WLPMA to assess whether the WLPMA is meeting the sustainability goal. The minimum threshold and measurable objective groundwater elevations defined in the GSP were found to represent elevations that would not impair the ability of the Oxnard Subbasin to eliminate net seawater intrusion over the SGMA planning and implementation horizon. The simulated groundwater elevations in the model scenarios developed for the Periodic Evaluation were above the minimum threshold groundwater elevations at all the key wells in the WLPMA after 2040. Furthermore, at the majority of the key wells in the WLPMA, the simulated groundwater elevations were above the measurable objectives after 2040. This is the same model that will be used to evaluate groundwater conditions for the BOY Study.

Recommendation 3: PREEMPTIVELY CONSIDER WHAT INFORMATION FROM THE BASIN OPTIMIZATION MODEL SCENARIOS CAN BE SHARED WITH THE TAC AND OTHER INTERESTED PARTIES

The Watermaster informed the TAC that some information from the model that they and Dudek plan to use for the basin optimization assessments of the West Las Posas Management Area (WLPMA) are subject to a protective order in the Oxnard Subbasin and Pleasant Valley Subbasin (OPV) Adjudication. Specifically:

> Some of the model files that Watermaster will use to prepare the LPV basin optimization yield study (specifically in the West Las Posas Management Area) includes files received from United Water Conservation District. These files and the information embedded in them may be subject to a protective order in the OPV Adjudication. Requests for access to or disclosure of those files will be reviewed against that protective order by FCGMA [Fox Canyon Groundwater Management Agency] counsel on a case-by-case basis.

In reviewing the scope of work for the BOYS, the TAC requested additional time and consultation to allow opportunities to receive and review information from the optimization model scenarios. The uncertainty regarding the TAC's ability to review information from the WLPMA optimization modelling concerns the TAC. As a means of avoiding this uncertainty and delays associated with legal review of requests for model information, the TAC proposes to provide test case requests for types of information for Watermaster counsel to review before the optimization modeling of the WLPMA is complete.

3.1 Recommendations:

The TAC specifically recommends that Watermaster staff and legal counsel consider whether information including but not limited to those listed below can be provided from the Coastal Plain model simulations planned for assessing basin optimization yield from the WLPMA.

- Time series datasets showing comparison of model inputs representing simulation of project and alternative pumping scenarios to the baseline scenario.
- Time series of simulated head data at key wells and other important locations for baseline, project, and alternative pumping scenarios.
- Total and zonal water budgets for the entire model area, portions of the model area, boundaries at the edges of the model, and boundaries between specific portions of the model for the baseline, projects, and alternative pumping scenarios.
- Total and zonal water budgets for the WLPMA portion of the model area, zones within the WLPMA portion of the model area, boundaries at the edges of the WLPMA within

the model, and boundaries between specific portions of the WLPMA model for the baseline, projects, and alternative pumping scenarios

Response to Recommendation 3:
Watermaster understands TAC's request to be able to review specific inputs to and outputs from the numerical model simulations to be conducted for the BOY Study. The UWCD model files, including those used to conduct simulations for the Periodic Evaluation, may be subject to a protective order in *OPV Coalition, et al. v. Fox Canyon Groundwater Management Agency, et al.*, Santa Barbara Sup. Ct. Case No. VENCI00555357. To date, UWCD has not agreed to conduct the model simulations for preparation of the BOY Study.

Although Watermaster and legal counsel will review each TAC request prior to providing data to TAC, Watermaster currently understands that:

- Watermaster will be able to provide TAC with groundwater production at each well for the baseline, project, and alternative pumping scenarios. This data was developed by Dudek, after consultation with the TAC, and is based on the allocation tables in the Judgment.
- Watermaster will be able to provide TAC with timeseries of simulated head data at key wells and other locations for baseline, project, and alternative pumping scenarios.
- Watermaster will not be able to provide total and zonal water budgets for the entire model area, portions of the model area, boundaries at the edges of the model, and boundaries between specific portions of the model for the baseline, projects, and alternative pumping scenarios because these areas are outside the Las Posas Valley Basin and, therefore, are outside the scope of the BOY Study for the Las Posas Valley Basin.
- Watermaster will be able to provide total water budgets for the WLPMA portion of the model, including boundaries at the edges of the WLPMA within the model for the baseline, projects, and alternative pumping scenarios. Watermaster will also be able to provide, within reason, zonal water budgets for zones within the WLPMA portion of the model area and boundaries between specific portions of the WLPMA model for the baseline, projects, and alternative pumping scenarios.

Conclusion
Watermaster agrees with TAC that the modeled increase in flow across the eastern boundary of the WLPMA is inconsistent with the hydrogeologic conceptual model. However, Watermaster notes that the model simulations conducted for the Periodic Evaluation generated multiple sustainable groundwater management scenarios in which groundwater elevations rose to and remained above the minimum thresholds during the GSP planning and implementation horizon. After noting the change in the model boundary conditions in both the Periodic Evaluation and the March 31, 2025, memo, Dudek concluded that running

the UWCD Updated Coastal Plain Model used during development of the Periodic Evaluation was the recommended approach to complete this first BOY Study.

Watermaster must prepare a BOY Study "every five years in coordination with the GSP Updates (Wat. Code, §10728.2) or at Watermaster's discretion in response to material changing or changed Basin Conditions" (Judgment § 1.22). This first BOY Study to be prepared under the Judgment is projected to be completed by spring 2026. The BOY Study schedule has already been delayed five months. Further delaying the completion of the first BOY Study beyond spring 2026 jeopardizes Watermaster's ability to implement management actions to ensure Sustainable Groundwater Management by 2040 (Judgment § 4.10.2).

In the absence of additional material changes to groundwater conditions, Watermaster anticipates that preparation of the second BOY Study would begin in 2028, only two years after completion of the first BOY Study, in order to be completed prior to January 2030 in coordination with the GSP Periodic Evaluation, as required by the Judgment. Changes to the modeling approach can be considered for the 2030 BOY Study.

Completion of the first BOY Study in spring 2026 will allow stakeholders and Watermaster to review the management actions undertaken as part of that study and make any necessary adjustments prior to the second BOY Study. Because the Judgment requires Watermaster to prepare the second BOY Study by January 2030 and allows Watermaster to prepare a BOY Study more frequently, if necessary, Watermaster recommends advancing the first BOY Study using the recommended approach provided in the March 31 memo.

June 25, 2025

Board of Directors
Fox Canyon Groundwater Management Agency
800 South Victoria Avenue
Ventura, CA 93009-1600

SUBJECT: Del Norte Water Company (WMID 3500) and Vanoni Group (WMIDs 1095, 1120, 1121) Protests and Requests for Refund of WY2023 Basin Assessment [LPV Watermaster] – *(Returning Item)*

RECOMMENDATIONS: (1) Receive a presentation from Agency staff on the protests and requests for refund of Water Year (WY) 2023 Las Posas Valley (LPV) Watermaster Basin Assessments submitted by Del Norte Water Company [WMID 3500] (DNWC) and Mary Vanoni on behalf of WMIDs 1095, 1120, 1121 (collectively, the Vanoni Group); and **(2)** Deny the DNWC and the Vanoni Group protests and requests for refund.

BACKGROUND:
The judgment entered in the Las Posas Valley (LPV) Adjudication (Judgment) requires the Agency, as the court-appointed Watermaster, to levy and collect a Basin Assessment from Water Right Holders: "Watermaster shall set, levy, and collect Basin Assessments and fees from Water Right Holders[.]" (Judgment, § 7.1.) Per the terms of the Judgment, Basin Assessments are to be uniformly applied to all Water Right Holders, regardless of their location within the Basin. (Judgment, § 7.2.) The only exception provides Watermaster limited discretion to "reduce the amount of the Basin Assessments levied on Water Right Holders that pay an assessment to [United Water Conservation District] if Watermaster determines, after Committee Consultation, that such a reduction is appropriate as a matter of equity." (Judgment, § 7.9.)

Under the Judgment, "[a]ny Party may seek judicial review of a Basin Management Action" by filing a motion with the Court. (Judgment, § 9.2.) However, prior to seeking judicial review, the disputing party "must timely exhaust[] opportunities for relief through the submission of written comments to Watermaster…concerning the Basin Management Action," and Watermaster and the disputing Party(ies) shall first engage in mediation unless both Watermaster and the disputing Party(ies) agree in writing to forego mediation." (Judgment, §§ 9.2.1.1, 9.2.1.2.) Importantly, the "Party must request mediation within 60 days of Watermaster taking a Basin Management Action." (Judgment, § 9.2.1.2.) "Watermaster may waive the requirement to engage in mediation in which case a Party that has exhausted its administrative remedies with Watermaster and [sic] may seek judicial review without having engaged in mediation." (Judgment, § 9.2.1.2.) Once

the mediation requirement has been satisfied, the "Party must seek judicial review of a Basin Management Action within 30 days after the mediation is concluded, waived, or the mediator issues a notice of impasse." (Judgment, 9.2.1.2.)

DISCUSSION:
On December 15, 2023, your Board adopted Resolution 2023-03, approving the levy of a $64/AF WY 2023 Basin Assessment and its collection in two equal installments. (Item 14A.) Subsequently, your Board rescinded the second installment with the adoption of Resolution 2024-04. (Item 14B.) Adoption of Resolution 2023-03 constitutes a Basin Management Action under the Judgment. (Judgment, §§ 1.18, 9.1.)

Without waiving any arguments with respect to the timeliness of DNWC's protests or otherwise, on July 17, 2024, Watermaster referred the April 2024 DNWC Letter to the Las Posas Valley Policy Advisory Committee (PAC) requesting consultation on DNWC's protest and whether equity demanded Watermaster refund all or some part of DNWC's WY 2023 Basin Assessment because DNWC pays a United assessment "such [that] a reduction is appropriate as a matter of equity." (Judgment, § 7.9.) The PAC refused to provide a recommendation, and instead claimed that the matter involved technical issues and requested the matter be referred to the Las Posas Valley Technical Advisory Committee (TAC). On October 23, 2024, your Board denied PAC's request to refer the matter to the PAC and directed PAC to provide its recommendations to Watermaster by November 8, 2024, commenting that the Basin Assessment issue was purely a policy issue and does not involve any technical issue or analysis. In response to your Board's direction, the PAC submitted a second recommendation report reiterating their earlier submission, thus to date, PAC has not provided Watermaster a recommendation to Watermaster on DNWC's protests.

DNWC Protest and Request for Refund
On April 18, 2024, DNWC submitted a written protest challenging its payment of the WY 2023 Basin Assessment, claiming its WY 2023 Basin Assessment should be reduced under Section 7.9 of the Judgment because it paid assessments to United Water Conservation District (United), and requesting a refund of duplicative amounts (April 2024 DNWC Letter). (Item 14C). Subsequently, on July 12, 2024, DNWC submitted a second letter indicating its intent to seek judicial review of the WY 2023 Basin Assessment as applied to DNWC, claiming that it pays an assessment to United for "replenishment activities that benefit DNWC and its Shareholders," and that the "Watermaster assessment is for activities and administration that either duplicate the activities of the UWCD or has no benefit to DNWC and its Shareholders" (July 2024 DNWC Letter). (Item 14D.) In the July 2024 DNWC Letter, DNWC requested (i) an amended notice of basin assessment that reflects a reduction of the alleged duplicative amount; and (ii) a refund of the alleged duplicative amount. This letter continues: "Please be advised that DNWC intends to seek relief pursuant to the provision of Section 9.2 of the Judgment." (July 2024 DNWC Letter, at p. 1.)

On February 28, 2025, DNWC submitted a third letter further explaining its positions that its payment of the WY2023 Basin Assessment is duplicative and also that its protest was timely submitted (February 2025 DNWC Letter). (Item 14E.) The February 2025 DNWC

Letter claims that the fees that DNWC paid to United for development of the models used for United's water replenishment services excuse it from having to pay the WY2023 Basin Assessment collected and used by Watermaster to prepare the plans and reports required by the Judgment: "United's modeling is used to assess the future sustainable yield of the West Las Posas Management Area…Therefore, the United assessment is funding activities that are necessary for the 'investigations, inspections, compliance with and enforcement of the Judgment,' rendering the Basin Assessment duplicative of United's assessment." (February 2025 DNWC Letter; Item 14E, at p. 2.)

Although the United model is used by both United and the Agency, DNWC overlooks the fact that the two agencies use the model for different purposes. In general, United uses the model to estimate basin conditions and demand in order to satisfy its water replenishment roles and responsibilities under the Water Replenishment District Act, Water Code section 60000 et seq. In contrast, the Agency, as Watermaster for the LPV Basin, uses the model to estimate operating and sustainable yields and to determine sustainable management actions (other than the purchase of replenishment supplies) consistent with its roles and responsibilities as a groundwater sustainability agency under the Sustainable Groundwater Management Act and the Watermaster under the Judgment. While their use of model may be similar, each agency's use is intended to satisfy specific requirements not shared among them. Further, DNWC's claims overlooks the fact that the Agency, acting as Watermaster, separately contracts for United's modeling services when it needs to use the model for preparation of a plan or report required by the Judgment. By separately contracting for these units of work specifically required by the Judgment, Watermaster uses United's model for specific Judgment purposes and pays for that work only with Basin Assessments collected from the Water Right Holders that benefit from that work. Finally, none of DNWC's letters identify any United fee amount that is duplicative of any portion of the WY2023 Basin Assessment. There is no reference to the amounts that DNWC paid to United during WY2023, let alone any identification of the specific parts of the United fees paid by DNWC, that are allegedly duplicative of the WY2023 Basin Assessment. DNWC provides no accounting of what amount of the United fees that it paid benefit the Oxnard and Pleasant Valley Basins, rather than the LPV Basin.

The February 2025 DNWC Letter also claims that its protest of the WY2023 Basin Assessment was submitted timely, but presents no new arguments or evidence in support of the fact that DNWC must have submitted its protest and request for mediation by February 13, 2024, which is 60 days after your Board adopted the WY2023 Basin Assessment on December 15, 2023, in order to be entitled to judicial review of the WY2023 Basin Assessment. (See Judgment, § 9.2.1.2.) DNWC's first protest letter was submitted in April 2024, and it did not request mediation. (See April 2024 DNWC Letter; Item 14E.)

Vanoni Group Protest and Request for Refund

On April 17, 2024, Mary Vanoni, on behalf of WMIDs 1095, 1120, and 1121, submitted a letter, similar to the April 2024 DNWC Letter, protesting payment of the WY2023 Basin Assessment (April 2025 Vanoni Group Protest Letter). (Item 14F.) The Vanoni Group letter claims that the group is "paying both United and FCGMA," "truly paying two times

for the same thing," and that "the Watermaster assessment [is] for activities that duplicate the activities of UWCD." (April 2025 Vanoni Group Letter, at p. 1.) The letter "formerly request[s] that the Watermaster Committee review this situation and resolve it as a matter of equity." (Item 14F.)

The Protests and Requests for Refund Should be Denied

Both the DNWC and the Vanoni Group protests and requests for refund of the WY 2023 Basin Assessment should be denied. DNWC claims that the WY 2023 Basin Assessment "is for activities and administration that either duplicate the activities of the UWCD or has no benefit to DNWC and its Shareholder." (See April 2024 DNWC Letter; Item 14C, at p. 2.) Similarly, the Vanoni Group claims that the WY2023 Basin Assessment is "for activities that duplicate the activities of UWCD." (See April 2025 Vanoni Group Letter; Item 14F, at p. 1.) However, the WY2023 Basin Assessment is not for services duplicative of those provided by UWCD. The Judgment provides that "[t]he Watermaster Budget will be funded by the Basin Assessment," and the Watermaster Budget shall include the estimated annual costs of (i) administrative management of the Basin, investigations, inspections, compliance with and enforcement of the Judgment, personnel and consultant costs, infrastructure maintenance, utilities, general operation and maintenance; (ii) construction, operation, maintenance, and administration of Groundwater enhancement or Basin Optimization Project identified in the Basin Optimization Yield Plan; and (iii) any adjustments to Basin Assessment previously approved. (Judgment, § 7.5.) In WY 2023, all of Watermaster's funds were budgeted for implementing and administering the several new requirements and processes included in the Judgment; educating Water Right Holders and enforcing these new requirements; and preparing plans required by the Judgment and complying with the requirements of the Sustainable Groundwater Management Act (i.e., preparation of evaluations of groundwater sustainability plans), which the Judgment makes a Watermaster responsibility. (See Item 14G.) The WY2023 Watermaster Budget did not allocate any funds for Basin Management Activities (e.g., projects, replenishment water) that might be considered duplicative of United's replenishment projects and services, and thus none of the WY 2023 Basin Assessment was used for purposes similar to, let alone duplicative of, United's activities, projects, and work.

The express language of the Judgment supports the above conclusion. In the absence of Basin Management Activities being included in a Watermaster Budget, Basin Assessments are collected to fund "administrative management of the Basin" and "investigations, inspections, compliance with and enforcement of the Judgment" on a "uniform" basis. (Judgment, §§ 7.2, 7.5.) But United is not responsible for implementing and enforcing the provisions of the Judgment throughout the LPV Basin; United's service area extends only to a part of the basin. The Judgment expressly appoints the Agency "[t]o assist the Court in the administration of [the] Judgment" and "to perform the tasks assigned to it by [the] Judgment." (Judgment, §§ 3.3, 5.1.)

All of the WY 2023 Basin Assessment collected from Water Rights Holders, including those collected from DNWC and the Vanoni Group, were used to fund implementation and administration of the Judgment (rather than Basin Management projects and services), which is a responsibility of the Agency not United. (See Judgment, §§ 3.3, 5.1.)

No amount of WY2023 Basin Assessments collected were used to fund any type of water replenishment project or activity that was also provided by United during WY 2023 to Water Right Holders in the western part of the LPV Basin. (See Item 14E.) Consequently, there was no duplication. Therefore, the WY2023 Basin Assessment did not result in any inequitable treatment of DNWC or the Vanoni Group requiring Watermaster to have reduced the assessment for them when the WY2023 Basin Assessment was adopted, or now refund a part of the assessment to them, "as a matter of equity." (Judgment, § 7.9.) Accordingly, it is recommended that your Board deny the DNWC and the Vanoni Group protests and requests for refund of the WY2023 Basin Assessment.

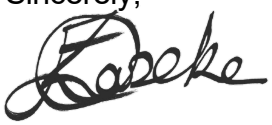
In addition to the above, neither DNWC's nor the Vanoni Group's protests and requests for refund were timely submitted. As explained above, the Judgment affords any Party the opportunity to seek judicial review of a Basin Management Action so long as it has "timely exhausted opportunities for relief through the submission of written comments to Watermaster…concerning the Basin Management Action." (Judgment, § 9.2.1.1.) One such opportunity is the requirement to engage in mediation prior to seeking judicial review: "Prior to seeking judicial review of a Basin Management Action, Watermaster and the disputing Party(ies) shall first engage in mediation…Watermaster may waive the requirement to engage in mediation in which case a Party that has exhausted its administrative remedies with Watermaster and [sic] may seeking judicial review without having engaged in mediation. A Party *must* request mediation within 60 days of Watermaster taking a Basin Management Action." (Judgment, § 9.2.1.2 (emphasis added).)

Here, the Basin Management Action at issue is your Board's approval of the WY2023 Basin Assessment – not DNWC's or the Vanoni Group's payment of the assessment that they now protest. Your Board approved the WY 2023 Basin Assessment with the adoption of Resolution 2023-04 on December 15, 2023. The Vanoni Group did not submit its protest letter until April 17, 2025, and DNWC did not submit its protest letter until April 18, 2024, approximately 489 days and 125 days after the WY 2023 Basin Assessment was approved by your Board. Under the Judgment, DNWC's and the Vanoni Group's protests and requests for refund were not timely because neither letter was submitted within 60 days of your Board's adoption of Resolution 2023-04 on December 15, 2023. (Judgment, § 9.2.1.2.) Even if they had been timely submitted, both the DNWC and the Vanoni Group letters failed to request mediation as required by the Judgment. (Judgment, § 9.2.1.2.) Accordingly, if DNWC and the Vanoni Group pursue judicial review of the WY2023 Basin Assessment, their motion would likely be denied because neither of their protests were submitted within 60 days of December 15, 2023, when your Board adopted the resolution approving the WY2023 Basin Assessments (the Basin Management Action at issue); and neither protest requested mediation, as required by the Judgment. (Judgment, § 9.2.1.2.)

CONCLUSION:
It is recommended that your Board deny the DNWC and the Vanoni Group protests and requests for refund of all or part of the WY2023 Basin Assessment paid by DNWC and the Vanoni Group.

This letter has been reviewed by Agency Counsel. If you have any questions, please call me at (805) 654 2954.

Sincerely,



Kudzai Farai Kaseke (Ph.D., PH, PMP, CSM)
Assistant Groundwater Manager

Attachments:

Exhibit 14A – Resolution No. 2023-03
Exhibit 14B – Resolution No. 2024-04
Exhibit 14C – Del Norte Water Company Protest Letter, April 18, 2024
Exhibit 14D – Del Norte Water Company Protest Letter, July 12, 2024
Exhibit 14E – Del Norte Water Company Protest Letter, February 22, 2025
Exhibit 14F – Vanoni Group Protest Letter, April 17, 2024
Exhibit 14G – December 15, 2023, Watermaster Budget Board Materials

Resolution No. 2023-03
of the
Fox Canyon Groundwater Management Agency

A RESOLUTION LEVYING A BASIN ASSESSMENT ON WATER RIGHT HOLDERS IN THE LAS POSAS VALLEY GROUNDWATER BASIN FOR FISCAL YEAR 2023-24

WHEREAS, the Fox Canyon Groundwater Management Agency (the Agency) is a groundwater sustainability agency under the Sustainable Groundwater Management Act (the Act) for the basins within the Agency's statutory boundaries; and

WHEREAS, on July 10, 2023, the Santa Barbara Superior Court entered final Judgment in Las Posas Valley Water Rights Coalition, et al. v. Fox Canyon Groundwater Management Agency, Santa Barbara Sup. Ct. Case No. VENC100509700 (Judgment); and

WHEREAS, the Judgment comprehensively determines and adjudicates all groundwater rights within the Las Posas Valley Groundwater Basin (Basin) and establishes and implements a Physical Solution for the Basin; and

WHEREAS, the Court appointed the Agency as Watermaster to administer the Judgment; and

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

WHEREAS, Section 7.2 of the Judgment provides that the Watermaster need not engage in Committee Consultation for the initial Basin Assessment levied in calendar year 2023; and

WHEREAS, the Agency Board of Directors adopted an initial Watermaster Budget of $2,559,814 for Fiscal Year 2023-24 at a special meeting on December 15, 2023; and

WHEREAS, at the December 15, 2023, meeting the Agency Board of Directors determined that an initial Basin Assessment of $64.00 per acre-foot of Annual Allocation is required to fund the Watermaster's management of the Basin.

NOW, THEREFORE, IT IS HEREBY PROCLAIMED AND ORDERED that effective December 15, 2023, a Basin Assessment of sixty-four dollars ($64.00) per acre-foot of Annual Allocation is levied on all Water Right Holders in the Las Posas Valley Groundwater Basin.

On motion by Director Maulhardt and seconded by Director Perello, the foregoing resolution was passed and adopted on December 15, 2023, by the following vote.

AYES – 5
NOES – 0
ABSTAINS – 0
ABSENT – 0

By: Eugene West Digitally signed by Eugene West Date: 2024.03.14 10:01:28 -07'00'
Eugene F. West, Chair, Board of Directors
Fox Canyon Groundwater Management Agency

ATTEST: I hereby certify that the above is a true and correct copy of Resolution No. 2023-03.

By: Keely Royas
Keely Royas, Clerk of the Board

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

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

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

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

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

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

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

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

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

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

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

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

By: _____
Elka Weber, Interim Clerk of the Board

Del Norte Water Company

Post Office Box 4065
Ventura, California 93007
Phone (805) 647-1092 Fax (805) 647-2805

April 18, 2024

Via E-Mail Transmission

Las Posas Valley Watermaster
LPV.Watermaster@ventura.org

Re: Protest of Basin Assessment - Release Date: 03/05/2024

Dear Sir or Madam:

Del Norte Water Company ("DNWC") received a Notice of Basin Assessment Release Date: 03/05/2024 made pursuant to Final Judgment filed 07/10/2023 in *Las Posas Valley Water Rights Coalition, et al. v. Fox Canyon Groundwater Management Agency*, et al., Case No. VENCI00509700. A copy of said Notice is attached hereto as Exhibit "A".

As you are aware, appeals of the Judgment are pending, although it has not been stayed.

On April 6, 2024, DNWC forwarded a check to the Watermaster of the funds collected by it from its Shareholders in response to the Notice of Assessment.

DNWC, for itself and each of its Shareholders (see List of WMIDs attached hereto as Exhibit "B"), hereby Protests the payment of the Basin Assessments made, with full reservation of all applicable rights against the Las Posas Valley Watermaster, because of the provisions of Section 7.9 of the Judgment which reads:

> "7.9 **Adjustments to Basin Assessments for UWCD Assessments**. Water Right Holders located in the western portion of the Basin within the UWCD's service area presently pay assessments to UWCD, a portion of which is used to finance UWCD's ongoing activities that are designed to replenish the Basin and neighboring basins. Watermaster may reduce the amount of the Basin Assessments levied on Water Right Holders that pay an assessment to UWCD if Watermaster determines, following Committee Consultation, that such a reduction is appropriate as a matter of equity."

DNWC completed the UWCD's Semi-Annual Groundwater Production Statements (attached hereto as Exhibit "C") for the period 07/01/2023 to 12/31/2023. DNWC has partially paid 25% of the $187,832 that was due and will pay the balance on June 30, 2024.

The UWCD assessment is based on replenishment activities that benefit DNWC and its Shareholders. DNWC is informed and believes the Watermaster assessment is for activities and administration that either duplicate the activities of the UWCD or has no benefit to DNWC and its Shareholders.

DNWC apologizes that, due to clerical error, this ~~Protest~~ was not made at the time the assessment monies were forwarded to the Watermaster on April 6, 2024.

Very Truly Yours,

DEL NORTE WATER COMPANY

JOHN C. ORR, President

JCO:mjr

cc: Shareholders of DNWC

Del Norte Water Company

Post Office Box 4065
Ventura, California 93007
Phone (805) 647-1092 Fax (805) 647-2805

July 12, 2024

Via E-Mail Transmission

Las Posas Valley Watermaster
LPV.Watermaster@ventura.org

Re: Protest of Basin Assessment-Release Date 03/05/2024

Dear Sir or Madam:

By letter dated April 18, 2024, Del Norte Water Company ("DNWC") sent a letter to the Watermaster protesting the payment of the Basin Assessment based on Section 7.9 of the Final Judgment (the "April 18 Protest"). [A copy of the April 18 Protest is attached hereto as Exhibit "1".] No response has been received from the Watermaster. Please be advised that DNWC intends to seek relief pursuant to the provisions of Section 9.2 of the Final Judgment:

> Section 9.2.1.1 of the Final Judgment provides: "Any Party seeking judicial review of a Basin Management Action must have timely exhausted opportunities for relief through the submission of written comment(s) to Watermaster, either individually or through a written report submitted by PAC or TAC, concerning the Basin Management Action."
>
> Section 9.2.1.2 of the Final Judgment provides: "Prior to seeking judicial review of a Basin Management Action, Watermaster and the disputing Party(ies) shall first engage in mediation unless both Watermaster and the disputing Party(ies) agree in writing to forego mediation. Watermaster may waive the requirement to engage in mediation in which case a Party that has exhausted its administrative remedies with Watermaster may seek judicial review without having engaged in mediation."

The April 18 Protest was DNWC's good faith attempt to initiate a dialogue with Watermaster regarding Section 7.9 assessment reductions. Having received no response from Watermaster on the protested matter, DNWC has exhausted administrative remedies and will continue to pursue its sought-after remedies through the above-referenced channels. The Watermaster assessment is for activities and administration that either duplicate the activities of

the UWCD or has no benefit to DNWC and its Shareholders. Notwithstanding the protest, DNWC complied with the Notice of Assessment and paid the $187,832.00 basin assessment in full. DNWC seeks the following remedies:

1) An Amended Notice of Assessment reflecting a reduction that is proportionate to the duplicative or non-beneficial activities and administration referenced above; and

2) Reimbursement that is proportionate to the reduction in the Amended Notice of Assessment.

DNWC remains hopeful that an agreement can be reached without resorting to mediation or judicial review. Please advise whether mediation or review by the Santa Barbara Superior Court will be necessary to enforce Section 7.9 of the Final Judgment.

Very truly yours,

DEL NORTE WATER COMPANY

JOHN C. ORR, President

JCO:nsh
Attachment

cc: DNWC Board of Directors – *Via E-Mail Transmission*
Barbara Brenner, Esq. – *Via E-Mail Transmission*

Del Norte Water Company

Post Office Box 4065
Ventura, California 93007
Phone (805) 647-1092 Fax (805) 647-2805

February 28, 2025

Via E-mail Transmission

Las Posas Valley Watermaster
LPV.Watermaster@ventura.org

Re: Del Norte Water Company Basin Assessment Protest and Request for Refund

Dear Watermaster:

Del Norte Water Company ("DNWC") submits this comment letter to address several issues raised in the January 22, 2025 Fox Canyon Groundwater Management Agency ("FCGMA") Board of Director's staff report (Item 17) related to DNWC's Basin Assessment Protest and Request for Refund ("Report"). Since April 18, 2024, after full payment of both the Basin Assessment under the Judgment1 and United Water Conservation District's ("United") groundwater pumping assessment, DNWC has sought a refund of the Basin Assessment based on the duplicative nature of the two assessments. The Report recommends denial of DNWC's request for refund because the Watermaster has not yet been engaged in Basin Management Activities and further finds that DNWC's reliance on Section 9.2 for further legal remedies to address its refund request is untimely. As further detailed below, neither of these findings are supported.

1. The Basin Assessment and United's Assessments are Duplicative.

The Judgment requires the Las Posas Management Areas in the West and East to be managed as one basin. (See e.g., Judgement at § 4.9.1.1, defining initial Operating Yield for the Basin as a whole as 40,000 AFY through at least Water Year 2024.) The current projects being considered by the Watermaster will only benefit the East Las Posas Management Area. (See e.g., First Periodic Evaluation of the Groundwater Sustainability Plan (Dec. 2024) § 3.2.) The First Periodic Evaluation of the Groundwater Sustainability Plan ("GSP") continues to lack significant data regarding the West Las Posas Management Area, notably the GSP has no data within the DNWC boundaries. (First Periodic Evaluation of the Groundwater Sustainability Plan (Dec. 2024) § 6.2; see also Figures 6-1, 6-2, 6-3.) In addition, the First Periodic Evaluation of the GSP acknowledges that United has a model or models and data it has gathered on the West Las Posas Management Area as well as in the East or Northeast of the Oxnard Pleasant Valley basin. (First Periodic Evaluation of the Groundwater Sustainability Plan (Dec. 2024) § 4.1.) Based on

1 "Judgment" refers to the Final Judgment entered on or about July 10, 2023 in the Las Posas Valley water adjudication, Santa Barbara County Superior Court Case No. VENCI00509700.

FCGMA's own admissions in the First Periodic Evaluation of the GSP, it is unassailable that the United spreading grounds replenish DNWC wells at its main plant and more than likely at its well on the Murata property on the Mesa.

With these facts in place, the Watermaster must exercise its responsibility to administer the Judgment, as provided in that document. (Judgment, § 5.1.) As part of that administration, the Watermaster is to "set, levy and collect Basin Assessments and fees from the Water Rights Holders…" (Judgment, § 7.1.) As detailed in the Report, the Basin Assessment is set based on the Watermaster Budget that includes the costs associated with administrative management of the Basin, Basin Optimization Projects, and adjustments to the Basin Assessment.

The Report alleges that "in the absence of Basin Management Activities, Watermaster cannot duplicate any service provided by United. When a Watermaster Budget does not include funding for Basin Management Activities, Basin Assessments are collected to fund 'administrative management of the Basin' and 'investigations, inspections, compliance with and enforcement of the Judgment.' " (Report, p. 3.) This statement ignores United's central role in the understanding and management of both the Oxnard Pleasant Valley and the Las Posas Basins, given the hydrologic communication between those basins. (GSP, Executive Summary ES-6, Dec. 2019.) For example, because the basins are connected, United's modeling is used to assess the future sustainable yield of the West Las Posas Management Area. (GSP, Executive Summary ES-7, Dec. 2019.) Therefore, the United assessment is funding activities that are necessary for the "investigations, inspections, compliance with and enforcement of the Judgment," rendering the Basin Assessment duplicative of United's assessment.

As another example, during the February 6, 2025 Policy Advisory Committee ("PAC") meeting, the need for United's modeling efforts and data was discussed. The lack of this information has delayed the Basin Optimization Plan and other watermaster efforts. (PAC February 6, 2025 Meeting Agenda, Item 3.) Further, in the most recent court filing by the Watermaster, the Court was also informed of the need for the United modeling and data. (FCGMA as Watermaster February 19, 2025 Status Conference Statement, at p. 5, attached hereto as Exhibit A.) These discussions and statements clearly demonstrate that United's activities, data, and modeling are all used in the Watermaster's activities to manage the Basin.

Additionally, DNWC's payment of the United assessment for United's spreading activities directly benefits the Las Posas Basin through the replenishment it provides. The Judgment establishes a physical solution to achieve sustainable groundwater management based on water allocations. United's replenishment activities provide water to meet the Judgment's allocations for the West Las Posas Management Area, including DNWC and its shareholders' allocations.

As part of the "investigations, inspections, compliance with and enforcement of the Judgment" that the Watermaster is currently undertaking, the possibility of using the Basin Assessment to establish funds to purchase water from Calleguas Municipal Water District ("Calleguas") is being evaluated. Water purchased from Calleguas can only be delivered to the eastern portion of the Las Posas Basin and cannot provide water to meet DNWC's allocation.

Despite this lack of benefit, the uniform application of the Basin Assessment is resulting in DNWC paying for the evaluation of activities that do not benefit its area of the Basin. All while at the same time, DNWC is paying United's assessment which actually provides replenishment of the basin as well as technical data that the Watermaster needs to investigate compliance with and enforcement of the Judgment as well as to prepare the Basin Optimization Plan and annually assess basin conditions. Therefore, the Basin Assessment is duplicative of United's assessment and United's operations benefit the basin as a whole.

2. DNWC's Assertion of its Rights Under Section 9.2 of the Judgment is Timely

DNWC submitted a letter on April 18, 2024, protesting its payment of the Basin Assessment under Section 7.9 of the Judgment because DNWC and its shareholders are "Water Right Holders located in the western portion of the Basin within [United]'s service area presently pay[ing] assessments to [United]." (Judgment, § 7.9.) Section 7.9 of the Judgment further provides that the Watermaster determines whether a "reduction is appropriate as a matter of equity," but the Watermaster only makes that determination "following Committee Consultation." Committee Consultation is, [t]he process by which Watermaster shall consult either with the Policy Advisory Committee or Technical Advisory Committee, or both as specified in the Judgment or Watermaster Rules, or in the Watermaster's discretion as may be appropriate under the circumstances, pursuant to Article VI." (Judgment, § 1.35.)

Section 6.3 of the Judgement establishes the process for the Watermaster to assign Basin Management Action for Committee Consultation, but provides no timeline for the Watermaster to make such assignment. Similarly, the Los Posas Watermaster Rules, attached as Exhibit A to the Judgment, provide no deadline for the Watermaster to refer a Basin Management Action to the Committee Consultation process. (See Watermaster Rules, § 2.9.) Consequently, there is no clear deadline for the Watermaster to refer DNWC's protest to its payment of the Basin Assessment.

DNWC's second letter, invoking its rights under Section 9.2 of the Judgment, was submitted on July 17, 2024. This is exactly 90 days following the submission of its protest letter on April 18, 2024. This gave the Watermaster 30 days to take action on DNWC's protest letter, while still ensuring that DNWC did not exceed the 60-day notice requirement for mediation under the Judgment. DNWC's invocation of Section 9.2 of the Judgment is timely as to the Watermaster's failure to act in addressing its protest to the Basin Assessment. A Basin Management Action includes "[a]ctions, failures to act, enforcement actions, decisions, or determinations by Watermaster related to the implementation of the Judgment as defined in Section 9.1." Therefore, DNWC's letter dated July 17, 2024 was timely in challenging the Watermaster's failure to act in commencing Committee Consultation to determine if equity required adjustment of the Basin Assessment based on DNWC's payment of the United assessment.

Because the Basin is being managed as a single basin, the management areas in the east and west must be equally benefited by the burdens being placed upon them under the Judgment.

Based on current planning efforts, DNWC, in the western area of the Basin, is to pay for proposed study and replenishment in the eastern area of the Basin. With that benefit in place, equity demands that the eastern area of the Basin, which is receiving the benefit of the Basin Assessment, pay for the benefit of the replenishment in the western area of the Basin through United's activities. That equity can be achieved either by crediting DNWC for the replenishment fees it pays to United, or in the alternative, by having United's assessment paid by ALL landowners within the Basin.

DEL NORTE WATER COMPANY

JOHN C. ORR, President

JCO:mjr
Attachments

cc: DNWC Board of Directors
Barbara A. Brenner, Esq.

EXHIBIT "A"

Watermaster February 19, 2025 Status Conference Statement

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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SANTA BARBARA

LAS POSAS VALLEY WATER RIGHTS COALITION, et al.,

Plaintiffs,

v.

FOX CANYON GROUNDWATER MANAGEMENT AGENCY, et al.,

Defendants.

AND RELATED CROSS-ACTIONS.

CASE NO. VENCI00509700
RELATED CASE NO. 20CV02036

ASSIGNED FOR ALL PURPOSES TO JUDGE THOMAS P. ANDERLE

FOX CANYON GROUNDWATER MANAGEMENT AGENCY'S STATUS CONFERENCE STATEMENT

Hearing
Date: February 19, 2025
Time: 8:30 a.m.
Dept: 3
Judge: Thomas P. Anderle
Location: Via Zoom

Action Filed: March 27, 2018
Judgment Entered: July 10, 2023

TO THE COURT, ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Fox Canyon Groundwater Management Agency, Watermaster for the Las Posas Valley Groundwater Basin ("FCGMA" or "Watermaster"), hereby submits this status report in advance of the February 19, 2025 status conference.

I. JUDGMENT IMPLEMENTATION AND BASIN MANAGEMENT ACTIONS

Watermaster continues its work to implement the Judgment and its physical solution, inclusive of FCGMA's basin management responsibilities under its enabling legislation and the Sustainable Groundwater Management Act ("SGMA"). Prior actions and milestones have been detailed in previous status conference statements and additional basin management actions and updates are summarized below.

A. Basin Assessments

Consistent with the Judgment, Watermaster has developed, noticed, levied, and collected Basin Assessments from water right holders in the Las Posas Valley Basin ("Basin") for Water Year ("WY") 2023 and the first quarter of WY 2024. For WY 2023, Watermaster levied and collected a single Basin Assessment in the amount of $32 per acre-foot ("AF"). After sending two Notices of Delinquent Basin Assessments, Watermaster received WY 2023 Basin Assessment payments from the vast majority of water right holders. As of February 6, 2025, Watermaster had received payments from all but ten (10) water right holders, resulting in the collection of $1,358,699.83 of WY 2023 Basin Assessments and $25,583.83 interest payments. In the coming weeks, Watermaster will file motions to enforce the Judgment to collect delinquent WY 2023 Basin Assessments consistent with its authority under the Judgment, including pursuant to section 2.8.2 of the Watermaster Rules.

For WY 2024, on September 25, 2024, Watermaster adopted a Basin Assessment in the amount of $64.58 per AF to be noticed, levied, and collected in four equal installments. On October 2, 2024, Watermaster noticed the Basin Assessment for the first quarter of WY 2024; payments were due on November 1, 2024. After sending two Notices of Delinquent Basin Assessments on December 11 and 24, 2024, Watermaster collected Basin Assessment payments for the first quarter of WY 2024 from all but fourteen (14) water right holders. Specifically,

Watermaster collected $620,856.54 in Basin Assessments and $8,908.41 in interest for the first quarter of WY2024. In the coming weeks, Watermaster will file motions to enforce the Judgment to collect delinquent Basin Assessments for the first quarter of WY 2024 consistent with its authority under the Judgment, including pursuant to section 2.8.2 of the Watermaster Rules.

A list of delinquent water right holders, identified by the water management identification numbers ("WMID") assigned by the Judgment, is maintained by Watermaster and is available on Watermaster's website.[1]

B. Extraction and Use Reporting

Watermaster also completed the noticing and collection of the Semi-Annual Extraction and Use reports submitted by water right holders as required by Watermaster Rules Article V (Extraction Monitoring and Reporting). As of February 6, 2025, twenty-seven (27) water right holders have failed to submit Extraction and Use Reports for WY 2023-1, while nineteen (19) water right holders failed to submit Extraction and Use Reports for WY2023-2. Given the need for accurate reporting of Groundwater Extraction and Use for determining whether basin management is consistent with Groundwater Sustainability Plan ("GSP") minimum thresholds and measurable objectives as well as determining water right holders' Carryover Allocations, Watermaster anticipates that it will need to take action under the Judgment to enforce timely and accurate reporting and to confirm that the delinquent water right holders are otherwise complying with metering requirements and any use restrictions within the Basin. (Judgment, § 5.2.6.; Watermaster Rules, § V.) It should be noted that timely and accurate information regarding groundwater production and use is foundational to Watermaster's ability to implement the physical solution and ensure compliance with the sustainable groundwater management mandates under SGMA.

C. Technical Activities

1. GSP Periodic Evaluation

As the groundwater sustainability agency ("GSA") for the Basin, FCGMA is required to

[1] https://fcgma.org/las-posas-valley-watermaster/

review and provide a periodic update to the GSP every five years. (Wat. Code, § 10728.2; Judgment, §§ 1.5, 4.9.) The First Periodic Evaluation of the GSP for the Basin was completed and approved by the FCGMA Board in December 2024, and timely submitted to the California Department of Water Resources in January 2025.

2. Basin Optimization Plan

The Judgment directs Watermaster to develop a Basin Optimization Plan to analyze the priority and feasibility of basin optimization projects designed to augment the Basin's operating yield while at the same time ensuring that the identified projects are consistent with sustainable management and are designed to prevent or alleviate undesirable results in the Basin. (Judgment, § 5.3.) In December 2024, Watermaster provided a draft Basin Optimization Plan to the Technical Advisory Committee (TAC) and to the Policy Advisory Committee (PAC) for review as part of the committee consultation process under the Judgment. That committee consultation process is ongoing. Watermaster will provide the Court with a further update on preparation and adoption of the Basin Optimization Plan at the next status conference.

3. Basin Optimization Yield Study and Study Schedule

The Judgment also directs Watermaster, with committee consultation, to undertake and finalize a Basin Optimization Yield Study (the "Study"). (Judgment, §§ 1.21, 4.10.) The primary purpose of the Study is to inform the Operating Yield[2] and rampdown rates (e.g., reduction of the Operating Yield) for each water year through WY 2039 so that the sustainable yield for the Basin under SGMA and the Operating Yield under the Judgment are the same by 2040. The Operating Yield also is used to determine each water right holder's annual water right allocation (e.g., the amount of groundwater each water right holder can extract). As previously reported, Watermaster completed the scope of work and budget for the Study in December 2023 and, following the completion of the required committee consultation process, on October 23, 2024 the Watermaster Board reviewed and approved the scope of work, budget, and contract for the preparation of the

[2] The "Operating Yield" under the Judgment is the "cumulative amount of Allocated Groundwater that may be sustainably Extracted from the Basin for Use in any particular Water Year under the terms of [the] Judgment, excluding the Use of any Groundwater pursuant to a right of Carryover." (Judgment, § 1.73.)

Study, including an additional scope of work recommended by TAC.

Exigent circumstances, detailed in Watermaster's November 27, 2024 Status Conference Statement, necessitated an extension of the schedule for the preparation and approval of the Study. (Judgment, § 5.2.8.) On December 23, 2024, FCGMA provided notice to PAC and TAC of the updated schedule for completion of the Study, with an estimated completion date of December 2025. (See Attachment A, Watermaster Memorandum to TAC re Basin Optimization Yield Study Schedule, dated Dec. 23, 2024.) Among other things, the adjusted Study schedule is reliant on access to certain models and modeling services historically performed by United Water Conservation District (UWCD). (*Id.* at p. 1.) Although the UWCD model scenario development was anticipated to begin in January 2025, and the adjusted Study schedule was based on this reasonable expectation, Watermaster recently was advised by UWCD that it cannot begin this work until May 2025, at the earliest. These delays by UWCD may require further adjustments to the Study schedule.

While Watermaster will continue its efforts to work with UWCD to secure necessary services, Watermaster also is actively evaluating alternatives to mitigate any further impacts to the Study schedule. In short, if Watermaster is unable to utilize UWCD's modeling services, Watermaster will need to identify, select, and secure alternative technical services to model future groundwater conditions within the West Las Posas Management Area to complete the Study. Proposed alternatives are being evaluated by Watermaster and its technical consultant, Dudek, and additionally have been provided to TAC and PAC for their input.

Watermaster will provide a further update to the Court as part of the April 2025 status conference.

4. Extension of Initial Operating Yield

As discussed, above, the Study is critical to ensuring Basin sustainability under the Judgment. For example, it will inform the Basin Optimization Yield, Operating Yield, and Rampdown Rate. (Judgment, §§ 1.21, 1.22, 4.10.1.3-4.10.2; see also *id.*, § 4.9.) The Judgment set an initial Operating Yield of 40,000 AF for WY 2023 and WY 2024. However, because the Study cannot be completed until December 2025 (after the start of WY 2025) at the earliest, and is

likely to be further delayed given the status of UWCD's modeling services, the Watermaster Board considered and approved recommending to the Court an extension of the Judgment's 40,000 AF initial Operating Yield through WY 2025 provided that such an extension will not adversely impact Watermaster's ability to achieve Basin sustainability by 2040 as required by SGMA and the Judgment. Watermaster's consultant, Dudek, has completed its evaluation and concluded that maintaining the initial Operating Yield of 40,000 AF for an additional water year in the Basin is not expected to result in negative impacts to groundwater producers in the Basin or to long-term sustainable management of the Basin.

As recognized by the Court's September 4, 2024 Ruling on Watermaster's Motion to Amend the Judgment and Watermaster Rules, "[t]he Judgment itself provides that the 'Watermaster may shorten or extend any deadline set forth in this Judgment where appropriate for exigent circumstances.'" (Sept. 4, 2024 Ruling, p. 12, citing Judgment, § 5.2.8.) Accordingly, given the exigent circumstances necessitating an extension of the Study schedule, and the technical determination that an extension of the 40,000 AF initial Operating Yield through WY 2025 will not impede the ability to reach sustainability by 2040, Watermaster asks that the Court recognize and approve its extension of the initial Operating Yield through WY 2025.

II. CONCLUSION

Pursuant to the Judgment, Watermaster proposes that the next status conference be held on April 9, 2025. (Judgment, § 9.3.) In conjunction with the status conference, Watermaster will review and provide an update to the Court on the status of all Judgment implementation efforts and associated schedules.

Dated: February 13, 2025

STOEL RIVES LLP

By: _____
ELIZABETH P. EWENS
MICHAEL B. BROWN
TIMOTHY M. TAYLOR
HERACLIO PIMENTEL

Attorneys for Defendant
Fox Canyon Groundwater Management Agency, Watermaster for the Las Posas Valley Groundwater Basin

EXHIBIT A

MEMORANDUM

To: Las Posas Valley Technical Advisory Committee

From: Kudzai F. Kaseke, Assistant Groundwater Manager

Date: December 23, 2024

RE: Basin Optimization Yield Study Schedule

Dear Las Posas Valley Technical Advisory Committee Members:

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

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

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

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

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

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

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

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

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

Basin Optimization Yield Study Schedule

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

DECLARATION OF SERVICE

Los Posas Valley Water Rights Coalition, et al. v. FCGMA, et al.
Santa Barbara County Superior Court Case No: VENCI00509700

I declare that I am over the age of eighteen years and not a party to this action. I am employed in the City and County of Sacramento and my business address is 500 Capitol Mall, Suite 1600, Sacramento, California 95814.

On February 13, 2025, at Sacramento, California, I served the attached document(s):

FOX CANYON GROUNDWATER MANAGEMENT AGENCY'S STATUS CONFERENCE STATEMENT

on the following parties:

***SEE ATTACHED SERVICE LIST**

☒ **BY FIRST CLASS MAIL:** I am readily familiar with my employer's practice for the collection and processing of correspondence for mailing with the U.S. Postal Service. In the ordinary course of business, correspondence would be deposited with the U.S. Postal Service on the day on which it is collected. On the date listed above, following ordinary business practices, I placed for collection and mailing at the offices of Stoel Rives LLP, 500 Capitol Mall, Suite 1600, Sacramento, California 95814, a copy of the attached document in a sealed envelope, with postage fully prepaid, addressed as shown on the service list. I am aware that on motion of the party served, service is presumed invalid if the postal cancellation date or postage meter date is more than one day after the date of deposit for mailing contained in this declaration.

☒ **BY ELECTRONIC TRANSMISSION:** I am readily familiar with the firm's practice for causing documents to be served via electronic transmission. Following that practice, on the date written above, I caused the aforementioned document(s) to be electronically submitted through the firm's email system to the email address(es) set forth below.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this document was executed on February 13, 2025, at Sacramento, California.

Jill Keehnen

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VIA U.S. FIRST CLASS MAIL	
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JRRE Horizon LLC c/o Jacob Rastegar, Managing Member 808 N. Bedford Drive Beverly Hills, CA 90210 *Defendant In Pro Per*	

VMB Water System
10814 Telephone Rd.
Ventura, CA 93004

April 17, 2025

To: Las Posas Valley Watermaster

Lpv.Watermaster@ventura.org

Re: Protest of Basin Assessment

Dear LPV Watermaster –

The VMB Water System, which consists of Rancho Isla Vista LLC, RBV 2+5 LLC and RBV-Vanoni LLC, **protest** the Water Year Basin Assessments.

We are paying both United and FCGMA. FCGMA $32 per acre foot in 2023 and $64.58 per acre foot in 2024. And we are also paying United Water $186.75 per acre foot.

According to the Judgement Section 7.9, we should have a reduction, as we are **truly paying two times** for the same thing.

*"7.9 **Adjustments to Basin Assessments for UWCD Assessments.** Water Right Holders located in the western portion of the Basin within the UWCD's service area presently pay assessments to UWCD, a portion of which is used to finance UWCD's ongoing activities that are designed to replenish the Basin and neighboring basins. Watermaster may reduce the amount of the Basin Assessments levied on Water Right Holders that pay an assessment to UWCD if Watermaster determines, following Committee Consultation, that such a reduction is appropriate as a matter of equity."*

We are paying the Watermaster assessment for activities that duplicate the activities of the UWCD. We would like to **formerly request that the Watermaster Committee review this situation and resolve it** as a matter of equity.

We look forward to hearing from you.

Mary Vanoni

Mary Vanoni

For VMB Water System:

RBV-Vanoni, LLC, Rancho Isla Vista LLC and RBV 2+5 LLC

WMIDs – 1121, 1095 and 1120

Rancho Isla Vista LLC
10814 Telephone Road
Ventura, CA 93004

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FOX CANYON GROUNDWATER
MANAGEMENT AGENCY

93009-

December 15, 2023

Board of Directors
Fox Canyon Groundwater Management Agency
800 South Victoria Avenue
Ventura, CA 93009-1610

SUBJECT: Las Posas Valley Initial Watermaster Budget and Basin Assessment for Fiscal Year 2023-24 Resolution No. 2023-03 [LPV Watermaster] – *(Continued Item)*

RECOMMENDATIONS: 1) Receive a presentation from Agency staff on a proposed initial Watermaster Budget and Basin Assessment for Fiscal Year 2023-24; **2)** Adopt the initial Watermaster Budget; and **3)** Adopt Resolution No. 2023-03 Basin Assessment of $64 per acre-foot of Annual Allocation for Water Right Holders in the Las Posas Valley Basin.

INTRODUCTION
This item was continued from the December 6, 2023, meeting at staff's request because notification was sent to the Fox Canyon Groundwater Management Agency (FCGMA or Agency) contact list but was not additionally distributed to the Las Posas Valley (LPV) Basin Watermaster service list. Beginning with this meeting, notice will be sent to both lists for all FCGMA Board meetings.

The Adjudication Judgment for the LPV Basin (Judgment) appointed the FCGMA as Watermaster to implement the Judgment in the Basin. The Judgment requires the Watermaster to take certain Basin Management Actions and includes deadlines and important dates to implement many of these Basin Management Actions. The Judgment requires the Watermaster to set, levy, and collect Basin Assessments and fees from Water Rights Holders in the LPV Basin to fund these Basin Management Actions and Basin Optimization Projects (Judgment § 7.1).

The Agency has been implementing Basin Management Actions without funding for this additional work. The Judgment recognized that funding was needed to implement the Judgment and provided the Watermaster the authority to levy an initial Basin Assessment in calendar year 2023 without a requirement for Committee Consultation or a requirement to draft a Watermaster Budget (Judgment § 7.2). Further:

> *Any initial Basin Assessment that Watermaster makes pursuant to this Judgment shall not exceed $200 per acre-foot of Annual Allocation. Watermaster, following Committee Consultation, and at all times acting as an agent of the Court, may thereafter reduce or increase the Basin Assessment as necessary to fund the Watermaster Budget.* (Judgment § 7.3)

Certain Basin Management Actions require "Committee Consultation" with the Policy Advisory Committee (PAC) and/or Technical Advisory Committee (TAC). The PAC is comprised of Water Rights Holders and other representatives appointed by your Board at a November 17, 2023, meeting. However, the TAC will

be comprised of three professional groundwater geologists and/or engineers to be paid from the Basin Assessments under contract with the Watermaster. Committee Consultation with the TAC is a critical-path function to comply with many of the tasks in Judgment schedule.

While the Judgment authorizes your Board to adopt an initial Basin Assessment up to $200 per acre-foot (AF) in 2023 without Committee Consultation or a draft budget, Agency staff prepared an initial Watermaster Budget as the basis of a proposed Basin Assessment in support of transparency and good public policy.

INITIAL WATERMASTER BUDGET:
Agency staff prepared a proposed initial Watermaster Budget for Fiscal Year 2023-24 attached as Item 1A. The initial Watermaster Budget is divided into seven principal tasks consistent with the requirements in the Judgment:

- Watermaster Administration
- Allocations & Record Keeping
- Basin Management
- Committee Coordination and Consultations
- Budget and Assessments
- Calleguas Aquifer Storage & Recovery Project
- Legal Services

Each principal task is broken into subtasks listing the reference to the applicable Judgment section(s), the annual labor hours estimate, the annual labor cost estimate, and contract cost estimate, as applicable. For the initial Watermaster Budget, the labor cost estimate is based on a blended hourly rate of $188 for Ventura County Public Works Agency (PWA) staff. Charge rates include indirect and overhead costs; only time spent directly working on FCGMA or Watermaster tasks is charged. A current organization chart of PWA staff working on FCGMA and Watermaster tasks is attached as Item 1B.

The total initial Watermaster Budget for FY 2023-24 is estimated at $2,559,814 consisting of $1,720,224 estimated labor costs and $839,590 estimated contract costs. It is anticipated that the initial Basin Watermaster Budget may need to be adjusted with addition of Basin Optimization Project costs following Committee Consultation.

INITIAL BASIN ASSESSMENT:
The Judgment requires that the Watermaster “shall assess all Water Right Holders a uniform Basin Assessment per acre-foot of Annual Allocation held by the Water Right Holder” (Judgment § 7.2). The initial Watermaster Budget for FY 2023-24 is estimated at $2,559,814 (Item 1A). The Judgment defines the initial Operating Yield of the LPV Basin as 40,000 acre-feet per year through at least Water Year 2024 (Judgment § 4.9.1.1). The Annual Allocations must be adjusted to equal the Operating Yield for the water year (Judgment § 4.2). Therefore, the initial Basin Assessment equals the budget total divided by the Operating Yield which is $64.00 per acre-foot of Annual Allocation. Resolution No. 2023-03 establishes a Basin Assessment of $64.00 per acre-foot of Annual Allocation on Water Right Holders in the LPV Basin for FY 2023-24 (Item 1C).

As discussed above, it is anticipated that the initial Watermaster Budget may need to be adjusted with addition of Basin Optimization Project costs following Committee Consultation. Any adjustment of the Watermaster Budget may require an adjustment of the Basin Assessment as appropriate.

ADMINISTRATION OF BASIN ASSESSMENT AND WATERMASTER BUDGET:
Basin Assessments will be held in a separate LPV Watermaster Fund, separate from the accounts in the FCGMA Fund and administered in accordance with the Judgment (Judgment § 7.6). As with work conducted for FCGMA, County staff only charge for time spent on specific tasks with separate billing codes for

Watermaster tasks. Consultants and contractors will be required to do the same. Any Basin Assessment funds that may remain at the end of the fiscal year will be held in the LPV Watermaster Fund and be available for the following fiscal year. Watermaster finances are subject to an annual audit by a certified public auditing firm with a full certified audit every three years (Judgment § 7.7).

FCGMA PUMPING FEES:
The Judgment provides that Watermaster's levying of a Basin Assessment does not affect the Agency's ability to collect pumping fees under its current authorities, provided that the Agency shall implement changes to the Agency's current pumping fees to "avoid inequitable, duplicative, or disproportionate financial burdens on Groundwater users" in the basin:

> *Watermaster's ability to impose such Basin Assessment, acting as an agent of the Court and under its auspices and oversight, does not modify or amend the FCGMA's separate, existing authority to adopt assessments or pursue funding including under SGMA and/or deriving from the FCGMA's enabling legislation (collectively, "FCGMA Assessments"), provided that the FCGMA shall implement changes to the FCGMA Assessments to avoid inequitable, duplicative, or disproportionate financial burdens upon Groundwater users in the Las Posas Basin after taking into account funds raised for administration of the Basin through the Basin Assessment.* (Judgment § 7.2)

The FCGMA Board's currently adopted pumping fees total $55 per AF and include the following three fees assessed per AF of groundwater extracted:

- $6 per AF Pump Fee (only fee charged to domestic operators pumping 2 AF per year or less)
- $29 per AF Groundwater Sustainability Fee
- $20 per AF GEMES Reserve Fee

Staff plans to schedule a special meeting of your Board's Fiscal Committee to study this issue in early 2024 followed by a Board meeting to consider any amendments needed to Agency's adopted FY 2023-24 Budget and recommendations for adjustments to the current FCGMA pumping fees for operators in the LPV Basin, if any, as appropriate for compliance with the Judgment requirements.

POLICY ADVISORY COMMITTEE COMMENT LETTER:
Agency staff attended the December 7, 2023, PAC meeting and answered questions about the proposed Watermaster Budget and Basin Assessment. Additionally, Agency staff met with the PAC ad-hoc budget subcommittee on December 11, 2023, to review the proposed Watermaster Budget and Basin Assessment and answer the subcommittee members' questions. The PAC subsequently submitted a comment letter on December 12, 2023, which is attached as Item 1D. The PAC made three recommendations in its letter. Following are a summary of their recommendations and Agency staff response:

1. Ensure there is no duplication of efforts between activities of FCGMA staff in meeting the standard obligations of the FCGMA, including preexisting or agency-wide contributions to the Groundwater Sustainability Plan, and its duties as Watermaster.

   Staff Response: Staff agrees with this comment. As discussed previously, a special meeting of your Board's Fiscal Committee will be scheduled in early 2024 to study this issue in detail. Thereafter, any amendments needed to the Agency's adopted FY 2023-24 Budget to avoid duplication of fees will be considered at a subsequent meeting of your Board.

2. Instruct staff to include in the budget funding for a PAC Administrator, similar to the inclusion of funding for three TAC members.

Staff Response: The Judgment does not include a paid PAC Administrator, rather it states that "the PAC shall appoint a PAC Administrator," and that the "Watermaster must consent to the approval of the appointment of the PAC Administrator, which consent shall not be withheld absent a demonstration of cause" (Judgment § 6.10.3.1). Unlike technical opinions and recommendations from the TAC, organizing and preparing meetings – and even Recommendation Reports that offer advice, input, and recommendations on non-technical, policy related matters – should not require the preparation of voluminous Recommendation Reports or a paid staff person.

3. Ensure there is sufficient funding in the budget to attract three TAC members of sufficient expertise to provide a level of support commensurate with the duties outlined in the judgment and the expectations of the community.

   Staff Response: The actual cost of TAC member services will not be known until the PAC forwards TAC member nominations and the Watermaster negotiates contracts for their professional services. The proposed initial Watermaster Budget estimate is based on 12 hours per each TAC meeting for each TAC member with two meetings per month. The estimated rate is $300 per hour, which is a typical rate charged by professionals with the credentials required by the Judgment. Ultimately, the total cost of TAC member services will depend on your Board's consideration and agreement of the professionals' proposed rates and fees, and thus may require amendment of the proposed initial Watermaster Budget.

JUDGMENT IMPLEMENTATION AND BASIN ASSESSMENT:
The Agency has been working expeditiously to implement the Judgment and has completed many of the initial tasks required by the Judgment including:

- Created, and maintaining, a LPV Watermaster area on the FCGMA website
- Created, processed, and maintaining the Watermaster service list
- Solicited corrections to the Groundwater Allocation Schedule from Water Rights Holders
- Solicited and processed Constituency Group confirmations and corrections from Water Rights Holders
- Organized, noticed, and facilitated PAC Constituency Group initial organizational meetings
- Board appointed representatives to the PAC
- Attended the first PAC meeting and met with the PAC ad-hoc budget subcommittee
- Prepared a draft scope of work and budget for the Basin Optimization Yield Study for submittal to the TAC, following appointment and completion of contracts with TAC members
- Prepared the proposed initial Watermaster Budget and Basin Assessment

Each of these tasks is work in addition to the Agency's normal duties and responsibilities under the FCGMA Act and SGMA. The Agency has conducted these initial LPV Watermaster tasks without new or additional funding. As a result, Judgment implementation has required – and relied on – the borrowing of funds previously paid by all pumpers within the Agency. This practice will continue until a Basin Assessment is adopted by your Board. Moreover, continued implementation according to the schedules included in the Judgment will include the following tasks required by the Judgment only (and not by the FCGMA Act or SGMA), most of which is expected to require significant funding compared to the above initial implementation tasks:

- Contract and appoint PAC's recommendations for professional consultants as TAC members
- Prepare the 2025 Basin Optimization Yield Study which requires submittal of draft scope of work and budget to TAC for its review and preparation of a Recommendation Report before commencing
- Prepare the Initial Basin Optimization Plan
- Provide support to the PAC and engage in Committee Consultation
- Prepare the forms and processes needed for receiving and processing allocation transfer requests

CONCLUSION AND RECOMMENDATIONS:
Staff recommends that your Board adopt the initial Watermaster Budget and adopt Resolution No. 2023-03 establishing a Basin Assessment on Water Right Holders in the Las Posas Valley Groundwater Basin of $64.00 per acre-foot of Annual Allocation. This letter has been reviewed by Agency Counsel. If you have any questions, please call me at (805) 650-4083.

Sincerely,

Kimball R. Loeb, PG, CEG, CHG
Groundwater Manager

Attachments: Item 1A – Proposed Initial Watermaster Budget for FY 2023-24
Item 1B – FCGMA Staff Organization Chart
Item 1C – Resolution No. 2023-03
Item 1D – PAC Comment Letter, December 12, 2023

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Las Posas Valley Basin

Initial Watermaster Budget FY 2023-24[1]

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

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Las Posas Valley Basin

Initial Watermaster Budget FY 2023-24[1]

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

Footnotes

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

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

3 Estimated annual hours for Ventura County staff.

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

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

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

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

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

FOX CANYON GROUNDWATER MANAGEMENT AGENCY

DIRECTORS

Eugene F. West (Chair) – Small Water Districts (805) 657-2121 *(Term Exp 2-28-27)*
Executive Committee, Fiscal Committee

Kelly Long (Vice Chair) – Ventura County Board of Supervisors (805) 654-2276 *(Term Exp 2-28-27)*
Executive Committee

Michael Craviotto – Farming Interests (805) 766-9602 *(Term Exp 2-28-26)*
Operations Committee, Flynn Award Selection Subcommittee

Lynn Maulhardt – United Water Conservation District (805) 982-0780 *(Term Exp 2-28-27)*
Operations Committee

Tony Trembley – Five Cities (805) 388-5307 *(Term Exp 2-28-26)*
Fiscal Committee, Flynn Award Selection Subcommittee

ALTERNATE DIRECTORS

Reddy Pakala – Small Water Districts (805) 990-6809 *(Term Exp 2-28-27)*

Vianey Lopez – Ventura County Board of Supervisors (805) 654-2613 *(Term Exp 2-28-27)*

David Borchard – Farming Interests (805) 485-3525 *(Term Exp 2-28-26)*

Keith Ford – UWCD (805)207-9062 *(Term Exp 2-28-27)*

Bert Perello – Five Cities (805) 240-6194 *(Term Exp 2-28-26)*

STAFF

Jeff Palmer – Interim Agency Executive Officer (805) 654-2373

Jason Canger – Agency Legal Counsel (805) 654-2879

Farai Kaseke – Assistant Groundwater Manager (805) 654-2954

Arne Anselm – Groundwater Specialist Ret. PT (805) 654-3942

Kathleen Riedel – Groundwater Specialist Ret. PT (805) 654-2064

Robert Hampson – Groundwater Specialist (805) 654-3952

Raya Nour – Engineer II (805) 654-2454

Kathy Jones – Staff Services Specialist (805) 645-1372

Cynthia Rodriguez – Administrative Assistant (805) 662-6831

Erin Ware – Administrative Assistant (805) 654-2032

Fatima Perez – Management Assistant (805) 650-4073

Kylen Wooley – Water Resources Compliance Specialist (805) 658-4374

Briana Barajas – Water Resources Specialist (805) 654-2021

Elka Weber – Clerk of the Board (805) 654-2014