

FOX CANYON GROUNDWATER MANAGEMENT AGENCY

A STATE OF CALIFORNIA WATER AGENCY



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INTERIM EXECUTIVE OFFICER

Arne Anselm

September 25, 2024

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

SUBJECT: Presentation on Las Posas Valley Adjudication Technical Advisory Committee Recommendation Report and Watermaster's Response Report on Projects to be Considered in the Basin Optimization Yield Plan and Study [LPV Watermaster] – (New Item)

RECOMMENDATIONS: (1) Receive and file a presentation from Agency staff on the Las Posas Valley Adjudication Technical Advisory Committee (TAC) Recommendation Report and Watermaster's Response Report; and (2) Provide direction to Watermaster staff.

BACKGROUND:

The Las Posas Adjudication Judgment (Judgment) provides that Watermaster shall, with Committee Consultation, prepare a Basin Optimization Yield (BOY) Study through which the Operating Yield for the Las Posas Valley Basin will be established for each Water Year for the period Water Year 2025 through Water Year 2029. (Judgment 4.10). Critical to the development of the BOY Study is the development of a Basin Optimization Yield (BOY) Plan whose elements are described in Section 5.3 of the Judgment.

DISCUSSION:

On January 12, 2024, your Board approved a scope of work for preparation of the BOY Plan. The scope of work included six (6) tasks that support development of the BOY Plan. The Judgment requires that certain tasks be performed prior to the BOY Plan being prepared. These tasks include (i) development of Project Evaluation Criteria and (ii) technical evaluation of projects to be included in the BOY Plan. The Watermaster referred these tasks to both the Policy Advisory Committee (PAC) and TAC for consultation as required by the Judgment (see Exhibit 24A, attached).

In response, Watermaster received a TAC Recommendation Report (attached as Exhibit 24B) with three comments and four recommendations and is waiting for feedback from the PAC.

Staff worked with Dudek to review and prepare the attached Watermaster Response Report to the TAC Recommendation Report addressing each of the comments and recommendations (attached as Exhibit 24C).

CONCLUSION:

Staff recommends that your Board (1) receive and file this board letter, the attached Watermaster Response Report, and today's presentation; and (2) provide any desired direction to staff.

This letter has been reviewed by Agency Counsel. If you have any questions, please call me at (805) 654 2954.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kaseke', with a stylized, cursive script.

Kudzai Farai Kaseke (PhD, PMP, CSM)
Assistant Groundwater Manager

Attachment: Exhibit 24A – Basin Optimization Plan Tasks 1 and 2 as referred to TAC
Exhibit 24B – TAC Recommendation Report - Basin Optimization Plan Tasks 1 & 2
Exhibit 24C – Watermaster Response Report - Basin Optimization Plan Tasks 1 & 2

FOX CANYON GROUNDWATER MANAGEMENT AGENCY

LAS POSAS VALLEY WATERMASTER



MEMORANDUM

Date: July 10, 2024
To: Las Posas Valley Watermaster Technical Advisory Committee
From: Kudzai F. Kaseke, Assistant Groundwater Manager
Subject: Draft Las Posas Valley Basin Project Evaluation Criteria and Technical evaluation of projects that will be included in the Basin Optimization Plan.

Dear Las Posas Valley Watermaster Technical Advisory Committee (TAC):

As the Watermaster for the Las Posas Valley Basin (LPVB), Fox Canyon Groundwater Management Agency (FCGMA) is responsible for preparing the Basin Optimization Plan for the LPVB. The Judgement in *Las Posas Valley Water Rights Coalition v. Fox Canyon Groundwater Management Agency VENC/00509700* (Judgement) requires LPVB committee consultation during development of the Basin Optimization Plan.

On January 12, 2024, the FCGMA Board of Directors approved a scope of work to prepare the LPVB Basin Optimization Plan. The scope of work included six (6) tasks that support development of the Basin Optimization Plan. As outlined in the Judgement and described in the approved scope of work, the first two tasks require committee consultation prior to the development of the remainder of the Basin Optimization Plan. These tasks are: (i) development of Project Evaluation Criteria and (ii) technical evaluation of projects that will be included in the Basin Optimization Plan. Watermaster referred these tasks to the Policy Advisory Committee (PAC) for committee consultation and currently awaits feedback from the PAC. Below is a summary of work completed on these tasks as of March 27, 2024.

Project Evaluation Criteria:

Dudek, in coordination with FCGMA staff, has developed a draft set of Project Evaluation Criteria for committee review. These criteria are based on the current FCGMA project evaluation process used in the Oxnard and Pleasant Valley Basins (OPV). The draft criteria developed for the LPVB consist of two forms: a project evaluation checklist, which is used to solicit information from the Project proponent, and a project evaluation ranking sheet. These forms will be used to assess the priority and feasibility of each project.

Project Evaluation Criteria

The draft set of Project Evaluation Criteria are separated into four distinct categories:

- 1) Water Supply benefits
- 2) Timing / Feasibility
- 3) Cost and Funding
- 4) Additional Project Considerations

The criteria included in categories 1 through 3 are the same as the current FCGMA project evaluation process used in the OPV.

Item 24A – BOY Plan Tasks 1 and 2 as referred to TAC

Category 4 – Additional Project Considerations – includes Judgment-specific information, such as a description of collaborations necessary to implement the project and a description of any anticipated material and unreasonable impact, as defined in the Judgement, that cannot be fully mitigated.

Project Ranking Sheet

The project ranking sheet introduces a set of points associated with each category defined in the draft project evaluation criteria. Using the information provided by individual project proponents, each project will be scored using the proposed ranking sheet. The points awarded for water supply benefits, timing/feasibility, and cost and funding are the same as the current FCGMA project evaluation process used in the OPV.

The proposed points for the Additional Project Considerations are as follows:

- 1) Collaboration / Cooperation requirements do not impact project scoring.
- 2) If a project is anticipated to cause material and unreasonable impact, as defined in the Judgement, that cannot be fully mitigated, twenty-five (25) points will be subtracted from the overall project score.
 - The twenty-five (25) point reduction was selected to be equivalent to the maximum points awarded under the water supply category.

Technical Project Evaluation

Following the development of the Project Evaluation Criteria, Dudek, in coordination with FCGMA, will begin technical review of the projects outlined in the Judgement. The scope of work approved by the FCGMA Board on January 12, 2024, identified nine (9) projects, each of which are identified in the Judgement, for inclusion in the Basin Optimization Plan.

To ensure that each project is appropriately evaluated, Dudek and FCGMA are requesting that LPVB committees:

- 1) Confirm that each project is appropriate for inclusion in the Basin Optimization Plan.
- 2) Confirm that the assumed project proponents are appropriate.
- 3) Provide input on the appropriate project proponent for Project 6.

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

Item 24A – BOY Plan Tasks 1 and 2 as referred to TAC

Projects Identified in the Judgement for Inclusion in the Basin Optimization Plan

Project Assumptions				Project Assumptions	
Project No.	Project Title	Project Proponent	Project Type	Project Details	
1	Removal, and periodic removal maintenance, of Arundo Donax from the Las Posas Valley watershed in an environmentally safe manner	FCGMA	Water Supply	Dudek assumes that the project details and benefits are the same as those developed during FCGMA's application for DWR's SGM Round 2 SGMA Implementation funding opportunity. Dudek will update the project description, as necessary, based on revised project evaluation criteria developed in Task 1.	
2	Importing of surplus water	CMWD	Water Supply	Dudek assumes that CMWD will develop the project description, cost estimates, and timing for implementation of this project.	
3	Arroyo Las Posas storm water capture and recharge	VCWWD-1	Water Supply	Dudek assumes that the project details and benefits are the same as those provided by VCWWD-1 during the project solicitation undertaken by FCGMA during development of the 2022 GSP Annual Report. Dudek assumes that VCWWD-1 will, as necessary and appropriate, update the project description based on the revised project evaluation criteria developed in Task 1.	
4	Constructing desalter(s) to address water quality issues in the Arroyo Simi Creek	VCWWD-1	Water Quality	Dudek assumes that the project details and benefits are the same as those provided by VCWWD-1 during the project solicitation led by FCGMA during development of the 2022 GSP Annual Report. Dudek assumes that VCWWD-1 will, as necessary and appropriate, update the project description based on the revised project evaluation criteria developed in Task 1.	
5	Formalizing an agreement with the City of Simi Valley ("City") to maintain up-stream wastewater treatment plant discharges, or treated effluent, into the 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	FCGMA	Water Supply	Dudek assumes that the project details and benefits will be developed in coordination with FCGMA.	
6	Formalizing an agreement with the City for recycled water deliveries to Las Posas Valley users 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	Unknown	Feasibility Study	Dudek assumes that the project proponent will be identified by the PAC, TAC, and FCGMA during development of the Basin Optimization Plan. The project proponent will be responsible for developing the project description and providing all relevant information to FCGMA.	
7	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	Zone MWC	Water Supply	Dudek assumes that the project details and benefits are the same as those provided by Zone MWC during the project solicitation led by FCGMA during development of the 2022 GSP Annual Report. Dudek assumes that Zone MWC will, as necessary and appropriate, update the project description based on the revised project evaluation criteria developed in Task 1.	
8	Developing a program for the least cost acquisition of Allocation Basis or Annual Allocations, or Carryover as an alternative to Replenishment	FCGMA	Water Supply	Dudek assumes that the project proponent will be identified by the PAC, TAC, and FCGMA during development of the Basin Optimization Plan. The project proponent will be responsible for developing the project description and providing the project details and benefits will to the FCGMA.	
9	Using Calleguas facilities for Replenishment	CMWD	Water Supply	Dudek assumes that this project will be led by CMWD and that the project description, cost, and benefits will be provided by CMWD as part of the Basin Optimization Plan development.	

Notes

FCGMA = Fox Canyon Groundwater Management Agency, City = City of Simi Valley, VCWWD-1 = Ventura County Water Works District No. 1, Zone MWC = Zone Mutual Water Company, CMWD = Calleguas Municipal Water District

"Project Benefits" will be characterized by each project proponent in a manner consistent with the Judgement and SGMA, including through an estimate of impact to groundwater levels, groundwater quality, groundwater in storage, interconnected surface water, and material injury

Item 24A – BOY Plan Tasks 1 and 2 as referred to TAC
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)
Groundwater Basin:	(Please fill in)
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)
Sustainability indicators addressed:	(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)

Item 24A – BOY Plan Tasks 1 and 2 as referred to TAC**LAS POSAS VALLEY WATERMASTER**

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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	
<i>Please provide documentation of anticipated project phasing, including schedules and costs (capital and O&M) for each phase, as an attachment to this form.</i>	
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)
Is the project anticipated to cause material and unreasonable impact, as defined in the Judgement, that cannot be fully mitigated?	(Please select one)
If yes, please describe the anticipated material and unreasonable impacts.	(Please fill in)

Item 24A – BOY Plan Tasks 1 and 2 as referred to TAC
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Project Evaluation Checklist

Project Proponent Contact Information	Response (Applicant to Complete)
Name:	(Please fill in)
Title:	(Please fill in)
Organization:	(Please fill in)
Email:	(Please fill in)
Phone:	(Please fill in)
Date:	(Please fill in)

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Project Ranking Sheet

Project Name _____ Project Type _____

Sponsoring Agency _____ Basin _____

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	Feasibility study in progress,	Initial feasibly study completed	30% engineering design	60% or greater engineering

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design, project not well defined	project well defined			design
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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

Item 24A – BOY Plan Tasks 1 and 2 as referred to TAC

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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. Undesirable Results/Material Injury

Is the project anticipated to cause material and unreasonable impact, as defined in the Judgement, that cannot be fully mitigated?

Points Awarded

-25	0
The project is likely to cause material and unreasonable impacts that cannot be mitigated, as defined in the Judgement.	The project is unlikely to cause material and unreasonable impacts as defined in the Judgement.

LAS POSAS VALLEY WATERMASTER

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Ranked by_____ Date_____

DRAFT

LAS POSAS VALLEY TECHNICAL ADVISORY COMMITTEE

August 27, 2024

RECOMMENDATION REPORT

To: Las Posas Valley Watermaster

From: Chad Taylor, LPV TAC Administrator and Chair

Re: TAC Consultation Recommendation Report on Basin Optimization Plan Tasks 1 and 2

The Las Posas Basin Watermaster Board of Directors (Watermaster) approved a scope of work in January 2024 to prepare the Basin Optimization Plan for the Las Posas Valley Basin. The scope included six Basin Optimization Plan development tasks, the first two of which require committee consultation consistent with the Las Posas Valley Basin Adjudication Judgement before proceeding with the latter tasks of Basin Optimization Plan development. These first two tasks are: (1) project evaluation criteria development and (2) technical evaluation of projects for inclusion in the Basin Optimization Plan.

Watermaster staff requested consultation from the Las Posas Valley Technical Advisory Committee (TAC) on the first two tasks of Basin Optimization Plan Development in the attached memorandum dated July 10, 2024. This memorandum provided a summary of work completed to date, a list of the projects being considered, a draft project evaluation checklist, and a draft project ranking sheet for TAC review and consultation. In addition, Watermaster staff specifically requested that the TAC:

1. Confirm that each project is appropriate for inclusion in the Basin Optimization Plan.
2. Confirm that the assumed project proponents are appropriate.
3. Provide input on the appropriate project proponent for Project 6.

The TAC discussed the project evaluation criteria, technical evaluation, list of projects, and the three items above in a Special Meeting on July 31, 2024. During this meeting TAC members identified comments on the adequacy of the information request form for projects, the project ranking criteria and associated weighting, assessment of project feasibility, and the collection of additional information to support project evaluation and planning. Recommendations were also developed for the Watermaster to consider.

TAC COMMENTS AND RECOMMENDATIONS

TAC comments and recommendations on Basin Optimization Plan Tasks 1 and 2 are presented below.

Item 24B – TAC Recommendation Report - Basin Optimization Plan Tasks 1 & 2

Comment 1:

Projects 2 and 9 (Importing of surplus water and using Calleguas facilities for replenishment, respectively) appear to be effectively one project with Project 9 a subset of Project 2. The Calleguas Mutual Water District (CMWD) TAC representative (Mr. Bryan Bondy, PG, CHG) reported that CMWD does not believe they are the correct project proponent for these projects. The representative indicated CMWD can provide input and assist with cost estimation but cannot define timing and logistics for importing surplus water for replenishment; this should be a shared responsibility.

Comment 2:

Mr. Bondy also reported that since the 2022 GSP Zone Mutual Water Company (Zone MWC) decided not to pursue grant funding for the infrastructure upgrades necessary to support the in-lieu water delivery within the Zone MWC service area identified in Project 7. Mr. Bondy reported that Zone MWC would like to request that the Watermaster replace Project 7 with an in-lieu delivery option feasibility study. Such a study could assess the potential for in-lieu water deliveries from other local agencies capable of delivering water from east Las Posas Valley to west Las Posas Valley. The study could include a review of existing infrastructure in the service areas of all the local agencies to identify opportunities, constraints, and costs associated with in-lieu water delivery.

Comment 3:

The TAC has no additional information on potential project proponent(s) for Project 6.

Recommendation 1:

Provide additional documentation of the process for defining, reviewing, and evaluating project components. Additionally, the TAC recommends considering and identifying critical path items or fatal flaws identified in any individual projects.

Recommendation 2:

Develop methods for evaluating how projects might affect groundwater quality and local undesirable conditions like pumping depressions, the effects of multiple projects on one another, and who the direct and indirect beneficiaries of each project would be.

Recommendation 3:

Include additional criteria addressing effects (positive or negative impacts) on sustainability criteria with a point scale of 1 to 20 in five categories, similar to the project implementation timeframe criteria.

Recommendation 4:

Solicit additional projects from stakeholders for inclusion and prioritization as part of the Basin Optimization Plan. This could include supplementing areas with limited natural recharge, filling data gaps with additional monitoring, assessing and improving irrigation efficiency, water level optimization through management of pumping locations and depths, or other projects identified by stakeholders.

Item 24 - Exhibit 24C – Watermaster Response Report - Basin Optimization Plan Tasks 1 & 2

LAS POSAS VALLEY WATERMASTER RESPONSE REPORT

Date: September 19, 2024

To: Las Posas Valley Watermaster Board of Directors

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

Re: Response Report to TAC Consultation Recommendation Report on Basin Optimization Plan Tasks 1 and 2

The Las Posas Valley Watermaster (Watermaster) requested consultation from the Las Posas Valley Technical Advisory Committee (TAC) on the first two tasks of Basin Optimization Plan development. Watermaster's request was in a July 10, 2024, memorandum to the TAC. The TAC discussed and developed its recommendation report at the July 31, 2024, and August 27, 2024, meetings. TAC's August 27, 2024, recommendation report included three comments and four recommendations. Each of these are listed below followed by Watermaster staff's recommendations.

Comment 1:

Projects 2 and 9 (Importing of surplus water and using Calleguas facilities for replenishment, respectively) appear to be effectively one project with Project 9 a subset of Project 2. The Calleguas Mutual [sic] Water District (CMWD) TAC representative (Mr. Bryan Bondy, PG, CHG) reported that CMWD does not believe they are the correct project proponent for these projects. The representative indicated CMWD can provide input and assist with cost estimation but cannot define timing and logistics for importing surplus water for replenishment; this should be a shared responsibility.

Response to Comment 1:

These were two of the nine projects identified in the Basin Adjudication Judgment: section 5.4.2 "Importing of surplus water," and section 5.4.9 "Using Calleguas facilities for Replenishment." No further explanation of these projects is provided in the Judgment and Watermaster staff agree that these two projects together appear to describe the project identified in the Groundwater Sustainability Plan as "Purchase of Imported Water from CMWD for Basin Replenishment." This project consists of supplying imported water to CMWD member purveyors to supply operators in the West Las Posas Management Area in lieu of pumping. Watermaster staff notes that CMWD does not believe that they are the correct project proponent. Watermaster will work with CMWD and its purveyors to better define the project(s) and appreciates CMWD's input and assistance with cost estimation.

Comment 2:

Mr. Bondy also reported that since the 2022 GSP Zone Mutual Water Company (Zone MWC) decided not to pursue grant funding for the infrastructure upgrades necessary to support the in-lieu water delivery within the Zone MWC service area identified in Project 7. Mr. Bondy reported that Zone MWC would like to request that the Watermaster replace Project 7 with an in-lieu delivery option feasibility study. Such a study could assess the potential for in-lieu water deliveries from other local agencies capable of delivering water from east Las Posas Valley to west Las Posas Valley. The study could include a review of existing infrastructure in the service areas of all the local agencies to identify opportunities, constraints, and costs associated with in-lieu water delivery.

Item 24C – Watermaster Response Report - Basin Optimization Plan Tasks 1 & 2

Response to Comment 2:

Project 7 is identified in Judgment section 5.4.7 as “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.” Watermaster staff believe this project description is broad enough to include defining a feasibility study as recommended by the TAC.

Comment 3:

The TAC has no additional information on potential project proponent(s) for Project 6.

Response to Comment 3:

Watermaster appreciates the feedback from TAC that it has no additional information regarding this project or project proponent(s).

Recommendation 1:

Provide additional documentation of the process for defining, reviewing, and evaluating project components. Additionally, the TAC recommends considering and identifying critical path items or fatal flaws identified in any individual projects.

Response to Recommendation 1:

The process for defining, reviewing, and evaluating, each project includes review of the criteria listed in section 5.3.2.1 of the Judgment, which are included in the Project Evaluation Checklist; review of additional information that may be available regarding each proposed project; and ranking the projects using the Project Ranking Sheet. Additional information about project evaluation is provided in Dudek’s December 27, 2023, scope of work to prepare the Basin Optimization Plan which was approved by the Watermaster Board at the January 12, 2024, special meeting. Critical path items or fatal flaws will be evaluated as part of this process.

Recommendation 2:

Develop methods for evaluating how projects might affect groundwater quality and local undesirable conditions like pumping depressions, the effects of multiple projects on one another, and who the direct and indirect beneficiaries of each project would be.

Response to Recommendation 2:

Each project will be evaluated for potential impacts on (i) groundwater levels, (ii) groundwater in storage, (iii) groundwater quality, (iv) land subsidence, (v) natural recharge, and (vi) minimum thresholds and measurable objective set forth in the Groundwater Sustainability Plan. Based on the information provided by each project proponent, a qualitative description of the potential benefits and/or negative impacts resulting from the project will be prepared. If a project is anticipated to cause undesirable results or result in material injury, the information provided by the project proponent will be used to characterize the number and location of surrounding groundwater extraction wells and users that may be impacted by the project.

Recommendation 3:

Include additional criteria addressing effects (positive or negative impacts) on sustainability criteria with a point scale of 1 to 20 in five categories, similar to the project implementation timeframe criteria.

Item 24C – Watermaster Response Report - Basin Optimization Plan Tasks 1 & 2

Response to Recommendation 3:

Watermaster staff developed the following criteria based on TAC's recommendation to replace criterion number 14:

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)?

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.

Recommendation 4:

Solicit additional projects from stakeholders for inclusion and prioritization as part of the Basin Optimization Plan. This could include supplementing areas with limited natural recharge, filling data gaps with additional monitoring, assessing and improving irrigation efficiency, water level optimization through management of pumping locations and depths, or other projects identified by stakeholders.

Response to Recommendation 4:

Watermaster staff believe this is a good recommendation by the TAC, but for future Basin Optimization Plans, as there is insufficient time to conduct a solicitation for the current Basin Optimization Plan. The current Basin Optimization Plan needs to be completed expeditiously in order to conduct the Basin Optimization Yield Study. Staff notes that there have been solicitations for projects from stakeholders in the Basin including in 2018 for the Groundwater Sustainability Plan, in early 2022 from larger water purveyors in the Basin including CMWD, Berylwood Heights Mutual Water Company, Del Norte Mutual Water Company, City of Moorpark, Ventura County Waterworks Districts 1 and 19, and Zone Mutual Water Company (Item 23C). Additionally, the Judgment included nine projects to be evaluated in the Basin Optimization Plan.