FOX CANYON GROUNDWATER MANAGEMENT AGENCY

A STATE OF CALIFORNIA WATER AGENCY

December 13, 2024

Board of Directors
Fox Canyon Groundwater Management Agency
800 South Victoria Avenue
Ventura, CA 93009-1610

SUBJECT: Approve the Response Reports Prepared in Response to the Las Posas Valley Policy Advisory Committee and Technical Advisory Committee Recommendation Reports on the Final Draft Five-Year Evaluation of the Groundwater Sustainability Plan for the Las Posas Valley Basin; Approve and Authorize Staff to Submit to the Department of Water Resources the Final Draft Five-Year Periodic Evaluation of the Groundwater Sustainability Plan for the Las Posas Valley Basin – *(New Item)*

RECOMMENDATIONS: (1) Receive and file a presentation from Agency staff and Dudek on the Final Draft 5-Year Periodic Evaluation of the Groundwater Sustainability Plan (GSP) for the Las Posas Valley Basin (LPV); **(2)** Approve the Response Reports prepared by Agency staff and Dudek in response to the Las Posas Valley Policy Advisory Committee and Technical Advisory Committee Recommendation Reports on the draft 5-Year Periodic Evaluation of the LPV GSP; and **(3)** Approve and authorize staff to submit the final draft 5-Year Periodic Evaluation of the Groundwater Sustainability Plans for the Las Posas Valley Basin to the Department of Water Resources by January 13, 2025.

BACKGROUND:
In December 2019, the Agency adopted the Groundwater Sustainability Plan for the Las Posas Valley Basin (LPV GSP). In January 2022, the Department of Water Resources (DWR) approved the LPV GSP, explaining that DWR would initiate the first five year-year review of the LPV GSP no later than January 13, 2025. The LPV GSP was prepared by the Agency's professional consultant Dudek.

The Sustainable Groundwater Management Act (SGMA) requires groundwater sustainability agencies (GSA) to periodically evaluate their groundwater sustainability plans to assess changing conditions in the basins that may warrant modification of their GSPs or management objectives. The Department of Water Resources (DWR) SGMA implementation regulations (DWR Regulations) provide that DWR will review GSA's periodic evaluations of their GSPs to ensure that GSPs, remain consistent with SGMA requirements and are being implemented in a manner that will likely achieve the sustainability goals for the relevant basins. The DWR Regulations require GSAs to

evaluate GSPs at least every five years and whenever a GSP is amended.[1] Under this schedule, the Agency's 5-Year Periodic Evaluation of the LPV GSP is due to DWR no later than January 13, 2025. The GSP Periodic Evaluation for the Las Posas Valley Basin (LPV) has been prepared by the Agency's professional consultant Dudek.

DISCUSSION:

Preparation Schedule

The Agency's preparation of the 5-Year Periodic Evaluation of the LPV GSP began in August 2023. At the direction of your Board, the Agency's preparation process and schedule included significant outreach to stakeholders and the public.

Specifically, preparation of the 5-Year Periodic Evaluation of the LPV GSP involved the following general items of work and proceeded according to the following schedule:

1. Stakeholder Engagement / Outreach
    a. Workshop No. 1: August 30, 2023 – Kick-off
    b. Workshop No. 2: April 2024 – Modeling
        i. LPV April 25, 2024
    c. Workshop No. 3: September 2024 – 5-year Evaluation Review and Feedback
        i. LPV September 2024
    d. Workshop No. 4 – November 2024 – GSP Amendment Review and Feedback
        i. LPV November 2024
2. Modeling and Data Analysis – July 2023 through June 2024
3. Board Meeting Discussions on Minimum Thresholds and Minimum Objectives - August 2024
4. Report Preparation – November 2023 through August 2024
    a. Monitoring Network Review
    b. New Information
    c. Projects and Management Actions
    d. Current Groundwater Conditions
    e. Plan Element Review
    f. Agency Action and Coordination
5. Report Review – August 2024 through November 2024
    a. Public Review – August 2024
    b. Final Draft Report– November 2024
    c. Board and public discussions on Final Draft – December 2024
    d. FCGMA Board Approval of Final Draft – December 2024
    e. Reports Submitted to DWR – January 2024

[1] Under the DWR Regulations, preparation of a periodic evaluation of a GSP does not trigger the need to amend the GSP. Rather, a GSA's desire to amend a GSP triggers the need to prepare an evaluation. As discussed in more detail below, Agency staff is not recommending amending the LPV GSP at this time.

Draft Periodic Evaluations

On August 22, 2024, the Agency released draft copies of the 5-Year Periodic Evaluation of the LPV GSP to the public on the Agency's website for review. At the same time, the Agency provided electronic notice to its service list of the availability of the drafts. After a 45-day review period, the Agency received a substantial number of comments on the draft copy of the 5-Year Periodic Evaluation of the LPV GSP. Generally, the comments were thoughtful and constructive. Each original comment has been made available on the Agency's website for your Board and interested parties to review. Agency staff and its professional consultant Dudek have carefully considered each comment. In some cases, comments resulted in changes to the draft LPV Periodic Evaluation. In other cases, the Agency has prepared responses to each comment, which can be found in Appendix A of the final draft 5-Year Periodic Evaluation.

Additional Requirements of the Las Posas Valley Adjudication Judgment

The judgment entered in *Las Posas Valley Water Rights Coalition, et al. v. Fox Canyon Groundwater Management Agency*, Santa Barbara Sup. Ct. Case No. VENC100509700 (LPV Judgment), imposes additional committee consultation requirements on the Agency prior to its adoption or approval of Basin Management Actions by the Agency when it is acting as the court-appointed Watermaster for the LPV Basins under the LPV Judgment. Specifically, where either the Las Posas Valley Policy Advisory Committee (PAC) or the Las Posas Valley Technical Advisory Committee (TAC) prepares a Recommendation Report on a Basin Management Action, the Agency must consider any Recommendation Report timely submitted by either the PAC or TAC and, if the Agency takes an action different from a Recommendation Report, then the Agency must respond to the committee's recommendations in a Response Report that explains the reasons why the committee recommendations, comments, or suggestions were not accepted. The LPV Judgment further requires that the Agency, acting as the Watermaster for the LPV Basins, to approve a Response Report concurrently with the Agency's approval of the Basin Management Action and include its Response Report in the agenda packet or board letter of the meeting at which the matter is considered by the Agency.

The Agency referred draft copies of the 5-Year Periodic Evaluation of the LPV GSP to the PAC and the TAC on August 26, 2024. In response, the PAC submitted a Recommendation Report to the Agency with nine recommendations on November 8, 2024. (See Exhibit 20A, attached.) In compliance with the LPV Judgment, Agency staff and Dudek have prepared a Response Report that responds to each of the PAC's nine recommendations, specifically identifying the recommendations accepted by the Agency and those recommendations that were not accepted and providing explanations and reasons for nonacceptance. (See Exhibit 20B, attached.) On October 10, 2024, the TAC also submitted a Recommendation Report consisting of five recommendations and an attachment with 179 comments from TAC members on specific sections of the draft 5-Year Periodic Evaluation of the LPV GSP. (See Exhibit 20C, attached.) In compliance with the LPV Judgment, Agency staff and Dudek have prepared a Response Report that responds to the TAC's five recommendations and also includes responses to the TAC's 179 specific comments and recommendations. (See Exhibit 20D, attached.)

As explained above, the LPV Judgment requires your Board, acting as the court-appointed Watermaster for the LPV Basin, to approve Response Reports prior to, or in conjunction with, the approval of Basin Management Actions, such as the approval of the 5-Year Periodic Evaluation of the LPV GSP. The Response Reports prepared by Agency staff and Dudek satisfy this obligation of the LPV Judgment. Agency staff and Dudek will be prepared to answer any questions your Board has regarding the Response Reports prepared in response to the PAC's and TAC's Recommendations Reports.

Key Revisions to Draft Periodic Evaluation

As required by the DWR Regulations, preparation of the final draft 5-Year Periodic Evaluation of the LPV GSP required analysis of current groundwater elevations against the target groundwater elevations for key groundwater wells included in the LPV GSP. Under SGMA and the DWR Regulations, these targets are also known as Minimum Thresholds (MTs) and Measurable Objectives (MOs) and serve as the standard by which the Agency and DWR determine compliance with SGMA and measure progress towards the achievement of the LPV Basin's sustainability goals. The original draft of the 5-Year Periodic Evaluation of the LPV GSP recommended changing some of the MTs and Mos at certain groundwater wells in the LPV Basins. However, after careful consideration of stakeholder and public comment, assessment of thresholds performance, and DWR Regulations requirements, Agency staff (in consultation with Dudek) has determined that changes to the MTs and MOs are not necessary at this time. Accordingly, without changes to the sustainable management criteria included in the LPV GSP, amending the LPV GSP is not necessary, and the final draft 5-Year Periodic Evaluation of the LPV GSP being presented for your Board's consideration today does not recommend amending the LPV GSP.

Availability and Presentation on Final 5-Year Periodic Evaluation of the LPV GSP

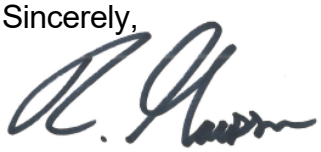
Due to its significant size, the final draft 5-Year Periodic Evaluation of the LPV GSP is not included as an attachment to this board letter. Clean and redline versions of the final draft 5-Year Periodic Evaluation of the LPV GSP are available, along with all original comments, on the Agency's website at: https://fcgma.org/gsp-evals-draft-comments/. Agency staff recommends that your Board review Appendix B of the Evaluation to understand the stakeholder and public comments received, and the Agency's responses, to the final draft 5-Year Periodic Evaluations of the LPV GSP and the preparation process.

Today your Board will receive a presentation from Agency staff and Dudek on SGMA and DWR Regulation requirements for preparing periodic evaluations of GSPs, the Agency's preparation of the final draft 5-Year Periodic Evaluation of the LPV GSP, and the Agency's response to comments on the final draft 5-Year Periodic Evaluations of the LPV GSP. In addition, Agency staff and Dudek will be available to answer any questions from your Board regarding its compliance with the LPV Judgment's committee consultation process, including the Responses Reports prepared in response to the PAC and TAC Recommendation Reports on the draft 5-Year Periodic Evaluation of the GSP for the LPV Basin.

CONCLUSION:
(1) Receive and file a presentation from Agency staff and Dudek on the final draft 5-Year Periodic Evaluation of the GSP for the LPV Basin; **(2)** Approve the Response Reports prepared by Agency staff and Dudek in response to the PAC and the TAC Recommendation Reports on the final draft 5-Year Periodic Evaluation of the LPV GSP; and **(3)** Approve and authorize staff to submit the final draft 5-Year Periodic Evaluation of the GSP for the LPV Basin for submittal to the DWR by January 13, 2025.

This letter has been reviewed by Agency Counsel. If you have any questions, please call me at (805) 654-3952.

Sincerely,



Robert Hampson
FCGMA Hydrologist

Attachments:

Exhibit 20A – TAC 5 Year GSP Evaluation Recommendation Report (October 10, 2024)
Exhibit 20B – PAC 5 Year GSP Evaluation Recommendation Report (November 08, 2024)
Exhibit 20C – Watermaster 5 Year GSP Evaluation Response Report, PAC (December 03, 2024)
Exhibit 20D – Watermaster 5 Year GSP Evaluation Response Report, TAC (December 03, 2024)

LAS POSAS VALLEY TECHNICAL ADVISORY COMMITTEE

October 10, 2024

RECOMMENDATION REPORT

To: Las Posas Valley Watermaster

From: Chad Taylor, LPV TAC Administrator and Chair

Re: TAC Consultation Recommendation Report, Draft First Periodic Evaluation, Groundwater Sustainability Plan for the Las Posas Valley Basin

The Las Posas Valley Basin Watermaster (Watermaster) requested a consultation from the Las Posas Valley Basin Technical Advisory Committee (TAC) for the Draft First Periodic Evaluation, Groundwater Sustainability Plan for the Las Posas Valley Basin (Draft GSP Evaluation). The TAC appreciates the effort the Watermaster, and their consultant (Dudek), committed to the Draft GSP Evaluation. Overall, the Draft GSP Evaluation is a well written document that appears to conform to the guidance provided by DWR. It is clear that the authors dedicated significant effort to provide a well-organized report evaluating and documenting groundwater conditions, planning, and management since the end of the period in the GSP. The TAC has reviewed the Draft GSP Evaluation and is providing this Recommendation Report to convey comments and recommendations to the Watermaster for consideration in revising the Draft GSP Evaluation prior to submittal to the California Department of Water Resources (DWR). The TAC also hopes these comments and recommendations will inform future groundwater sustainability planning for the Las Posas Valley Basin (LPVB).

This Recommendation Report presents major comments and recommendations on the Draft GSP Evaluation in a narrative format. These major comments are illustrated in the attached table providing detailed technical and editorial comments from each TAC member referencing specific sections of the Draft GSP Evaluation. These detailed comments were also provided to the Watermaster on October 4, 2024 to facilitate rapid review and integration into the final GSP Evaluation.

TAC COMMENTS AND RECOMMENDATIONS

Comment / Recommendation 1: Inconsistent Groundwater Monitoring

TAC members all noted and commented on the inconsistency of groundwater elevation and water quality monitoring in the LPVB. Specifically, expected and necessary groundwater elevation and water quality measurement events have been routinely missed since adoption of the GSP. It is critical that these basic data be collected frequently and consistently as

without them it is not possible to evaluate conditions in the Basin relative to sustainable management criteria with certainty. The TAC recognizes that the Watermaster relies on partner agencies for groundwater monitoring in many cases and cannot control the data collection programs of those agencies. However, the inconsistent data collection that has occurred as a result of this approach thus far presents a problem that is too large for the Watermaster not to address as quickly and effectively as possible. The TAC is concerned that important interpretations and statements regarding groundwater sustainability presented in the Draft GSP Evaluation are based on limited data (in some cases as little as one or two data points). These interpretations include evaluations of basin-wide, aquifer specific, and management area groundwater conditions, comparisons to minimum thresholds for groundwater sustainability, and conclusions regarding the effectiveness of groundwater management in the LPVB. The TAC questions whether the interpretations can be relied upon given that they are based on such limited and inconsistent data.

To address this inconsistent groundwater monitoring problem the TAC recommends the following:

1. Appropriately caveat interpretations, comparisons, and conclusions that rely on limited and inconsistently collected data (see detailed comments in the attached table for references to specific text passages).
2. Either establish agreements with partner agencies to consistently, correctly, and routinely collect the groundwater elevation and water quality data required to adequately assess groundwater conditions and progress towards sustainability or begin perform these monitoring responsibilities using Watermaster staff.
3. Fast track the projects in the GSP and Draft GSP Evaluation that include construction of monitoring wells and instrumentation of those and other monitoring wells with transducers (Projects 7 and 8, respectively). The Draft GSP Evaluation alluded to delays in implementation of these projects occurred because the Watermaster did not receive requested grant funds. The TAC recommends identifying alternative funding sources for this critical component of successful sustainable groundwater management. If alternative funding sources cannot be secured, consider requesting Technical Support Services (TSS) from DWR. The DWR TSS program was designed to provide field activity support, including monitoring well installation, groundwater level monitoring training, and other relevant assistance.
4. Expand the existing monitoring network by including private wells when and where necessary. While private, active, pumping wells are not perfect for groundwater elevation and water quality monitoring, they are a reasonable means of expanding monitoring networks into areas where dedicated monitoring wells don't exist and providing redundancy for existing monitored wells.

Comment / Recommendation 2: Boundary Condition Differences in West and East Management Area Models

The Draft GSP Evaluation indicates that the model used to simulate conditions in the West Las Posas Management Area (WLPMA), the Coastal Plain Model, developed, maintained, and employed by United Water Conservation District (UWCD) was recently modified. The

extent and nature of these modifications was not described in detail in the Draft GSP Evaluation, but TAC review did note that a potentially significant change was made to the boundary condition used to represent the Somis Fault, which separates the WLPMA from the East Las Posas Management Area (ELPMA). This component of the Coastal Plain Model that is important to the representation of groundwater flow in the LPVB 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 allowed flow from the WLPMA to the ELPMA.

The Draft GSP Evaluation indicates that the limited groundwater elevation information in this area of the LPVB implies limited groundwater flow across the Somis Fault and that gradients suggest that if flow occurs it is from ELPMA to WLPMA. Unfortunately, further exploration of the effects of the change to the Coastal Plain Model are not included in the document.

The ELPMA model used to simulate conditions in the ELPMA maintains a no-flow boundary along the Somis Fault, which the TAC assumes results in potentially significant differences in simulated groundwater flow across the WLPMA/ELPMA boundary in the two models. However, the differences between the flow conditions and water budgets in the two models is not described in the Draft GSP Evaluation. The TAC is concerned that the difference in the representation of this boundary between the two LPVB management areas signifies a problematic discrepancy in simulated groundwater flow and budgets within the LPVB.

The Draft GSP Evaluation does indicate that the Watermaster plans to coordinate with UWCD and the TAC to better align the representation of this boundary condition in advance of the Basin Optimization Yield Study. However, the Draft GSP Evaluation relies on simulations using these two models to assess the adequacy of the GSP to meet the sustainability goal of the LPVB, including the effect of projects and management actions and estimating historical changes in groundwater storage, effects of reductions in groundwater production, and sustainable yield for each management area.

The TAC also notes that the Draft GSP Evaluation includes references to multiple documents that include additional information regarding the changes to the Coastal Plain Model. However, these references are either not yet available for review or the information included in them is not included in the Draft GSP Evaluation.

The TAC recommends the following regarding this model discrepancy:

1. Add detailed information relating to the changes to the Coastal Plain Model. This should include maps showing the area of changed Somis Fault boundary conditions, volumes of flow between the two management areas, comparison to the version of the model used in the original GSP, etc. This additional detail should be aimed at providing information to alleviate concerns regarding the apparent inconsistency between the two models.
2. Include relevant information on the changes to the Coastal Plain Model in the Draft GSP Evaluation, not simply as references to other documents. Stakeholders and

interested parties should not have to read reports for other basins to access information related to important components of the LPVB GSP Evaluation.

3. Assess and document the differences in simulated flow and water budgets across the Somis Fault between the two models and include this information in the GSP Evaluation.
4. 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.

Comment / Recommendation 3: Relationship Between Oxnard Subbasin and Sustainability in the WLPMA

The TAC is concerned that the methods used to date to assess the effects of pumping in the WLPMA on seawater intrusion conditions in the Oxnard Subbasin lack scientific rigor. 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 recommends developing model scenarios that limit changes to single variables to assess the impacts of those variables on sustainability. This could include scenarios wherein pumping in the Oxnard Subbasin and Pleasant Valley Subbasin are held constant while pumping in WLPMA is varied. Comparison of the results of such simulations could then be compared to the baseline to evaluate changes in seawater intrusion in the Oxnard Subbasin, thereby developing a relationship between pumping volume in WLPMA and seawater intrusion. Similar scenarios with reductions in pumping in only the Oxnard Subbasin and only the Pleasant Valley Basin could also be conducted to isolate the effects of changes in pumping in those basins on seawater intrusion. Estimates of the effects of pumping reductions in each individual basin could then be used to more precisely identify the sustainable yield in each basin.

Comment / Recommendation 4: Respond Completely to all Elements of the DWR Recommended Corrective Actions

The DWR recommended corrective actions (RCAs) all include multiple requests for additional information, and the responses did not always provide all the requested information. For instance, the RCA 2 requests discussion of the potential effects of the minimum thresholds and measurable objectives on beneficial uses and users of groundwater. However, the sections of the Draft GSP Evaluation intended to respond to this RCA may not adequately respond to this request. The discussion that is included is somewhat vague about the beneficial uses and users and includes errors, as detailed in the

specific comments in the attached table. This is true for other RCA responses as well, as documented in the attached table.

The TAC recommends carefully reviewing the entirety of each RCA and identifying each component of DWR's request and including responses. The TAC believes that it is better to acknowledge each element of the RCA, even if there is insufficient information to completely address the request. In such cases it would be appropriate to indicate how the Watermaster plans to address the RCA in the future.

Comment / Recommendation 5: Check Entire Document for Consistency of Language and Content

The TAC noted variability in the Draft GSP Evaluation relating to use of language when presenting important conclusions and between tables and text. The TAC review specifically noted sections of text that presented the same information but used different language that was sometimes less certain and/or impactful. Instances of passive and uncertain terminology in important conclusions were also observed.

The TAC recommends the authors review the detailed comments in the attached table and perform a thorough review of the document to maintain consistent content and impact throughout.

Attachment 1

Specific Comments from the Las Posas Valley Basin Technical Advisory Committee, Draft First Periodic Evaluation, Groundwater Sustainability Plan (GSP) for the Las Posas Valley Basin

Specific Comments from the Las Posas Valley Basin Technical Advisory Committee
Draft First Periodic Evaluation, Groundwater Sustainability Plan (GSP) for the Las Posas Valley Basin

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment
BB-TC-1	Bryan Bondy	General Technical	Interpretations Made Based on Limited Data	--	--	--	Interpretations presented in the document that are based on limited data (in some cases as little as one or two data points), should be appropriately caveated and, as discussed in other comments, steps should be taken to better coordinate with monitoring partners to reduce the frequency of missing data.
BB-TC-2	Bryan Bondy	General Technical	Missing Monitoring Data	--	--	--	There are a notable number of unavailable groundwater level and quality measurements during period since GSP adoption. It is critical that data be collected to evaluate status relative to the sustainable management criteria and more generally understand groundwater conditions. It is noted that FCGMA does not collect data itself and, instead, relies on other entities monitoring programs for data. To date, it does not appear that FCGMA has formalized arrangements with the monitoring entities. It is recommended that FCGMA coordinate with the monitoring entities communicate FCGMA's data needs and formalize agreements. In cases where the monitoring entities cannot commit to providing certain data or if monitoring locations are no longer available or accessible, FCGMA should take steps to address those gaps.
BB-TC-3a	Bryan Bondy	Technical	--	ES-2	3rd paragraph	*In the western part of the WLPMA groundwater elevations in the FCA were higher in water year 2024 than they were in water year 2015.*	Based on Figure 2-4, there does not appear to be any 2024 groundwater level measurements in the western half of the WLPMA. Therefore, it is unclear what data the quoted sentence is based upon.
BB-TC-3b	Bryan Bondy	Technical	--	ES-2	3rd paragraph	*In contrast, groundwater elevations in the eastern part of the WLPMA were lower in water year 2024 than they were in water year 2015.*	Based on Figure 2-4, there is one well indicating a higher groundwater level in 2024 and one indicating a lower groundwater level in the eastern half of the WLPMA. Therefore, it is unclear what data this statement is based upon.
BB-TC-3c	Bryan Bondy	Technical	--	ES-2	3rd paragraph		Consider instead distinguishing between changes in the pumping depression in the southeastern corner of the WLPMA versus the remainder of the management area, with groundwater levels appearing to be lower in former and higher in the latter.
BB-TC-4	Bryan Bondy	Technical	Representative Monitoring Points		Figure 2-2 Table 2-2	--	Consideration should be given to enhancing the RMP network (per review of Figure 2-2): • Western WLPMA – there is no RMP for the Fox Canyon Aquifer • WLPMA and ELPMA – both areas lack GCA RMPs (potential candidate RPM well is 03N19W30E07-D) • Epworth Gravels – only one RPM (potential candidate for additional RMPs include 03N19W30M02 and 03N19W30E07-S)
BB-TC-5	Bryan Bondy	Technical	Zone Mutual Water Company Infrastructure Improvement Project		Table 1-1, 4th row; Section 3.2.1; Section 5.2.2.1.5	--	While Zone Mutual Water Company (Zone) is moving forward with the infrastructure improvements described in the evaluation report, Zone has indicated there are potential legal issues that may prohibit or limit Zone's ability to wheel water to non-shareholders. These issues need to be studied along with other opportunities for moving water between WLPMA and ELPMA. Regarding the 500 AFY of water savings associated with converting from scheduled deliveries to on-demand deliveries, this benefit should not be included in the future water supplies for the Projects Scenario because that water savings will be retained as carryover or leased to other water right holders for the benefit of Zone shareholders unless Watermaster creates a financial mechanism to make Zone whole.
BB-TC-6	Bryan Bondy	Technical	Analysis of Effects of MTs on Beneficial Users in ELPMA	7-8	Section 2.2.1.2; Table 2-1	*The depth and groundwater production rates from the wells in this area indicate that they are agricultural wells…*	This statement is incorrect. 10 of the 22 wells are Calleguas ASR wells.
BB-TC-7	Bryan Bondy	Technical	Analysis of Effects of MTs on Beneficial Users in ELPMA	7-8	Section 2.2.1.2; Table 2-1	--	The reviewer checked the top perforation elevation of 13 of the 22 wells in Table 2-1 for which data was readily available and found 12/13 to be incorrect, with errors averaging 48 feet ranging from 10 to 364 feet. Using the correct elevations for the twelve wells reviewed would add three wells to the number of wells with a projected groundwater elevation below the top of the screen. Based on these findings, a full QC of this table is warranted.

Specific Comments from the Las Posas Valley Basin Technical Advisory Committee
Draft First Periodic Evaluation, Groundwater Sustainability Plan (GSP) for the Las Posas Valley Basin

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment
BB-TC-8	Bryan Bondy	Technical	Analysis of Effects of MTs on Beneficial Users in ELPMA	7-8	Section 2.2.1.2; Table 2-1	--	The analysis implies that significant effects will not manifest until the static groundwater level drops below the top of the screen in a well. The analysis also implicitly assumes that pumping can be sustained with pump placements in the screen interval. These assumptions are inconsistent with the generally accepted well design principle of pump placement above the top of screen to avoid pump bowl or screen abrasion, sand production, cascading water, and accelerated fouling (Glotfelty, 2019 - Art of Water Wells). Wells with partially desaturated screens commonly experience increased fouling rates (sometimes very rapid), which causes significant loss of production, premature well rehabilitation, and premature well replacement. Text should be added to explain why these effects are not considered in the analysis.
BB-TC-9	Bryan Bondy	Technical	Analysis of Effects of MTs on Beneficial Users in ELPMA	7-8	Section 2.2.1.2; Table 2-1	--	Given that 10 of the 22 wells identified in Table 2-1 are Calleguas ASR wells, the analysis should address potential effects on storage and recovery operations of the Calleguas ASR well fields.
BB-TC-10	Bryan Bondy	Technical	GDEs	34	Section 2.7.2	*The areas where satellite imagery indicates declining plant cover may be related to shifting flow patterns within the arroyo, with decreasing greenness on the banks of the arroyo and decreasing greenness in the downstream portion of the arroyo, adjacent to the PVB.*	Another potential explanation for decrease greenness could be vegetation removal during high flow events during the 2023 and 2023 wet seasons. Air photos could be reviewed to assess this.
BB-TC-11	Bryan Bondy	Technical	Arroyo Simi-Las Posas Water Acquisition Project	40	Section 3.1.2.3.2 and Table 3-1	*Text states the project "will make additional water available to recharge" and table states the project benefit will be "increase in sustainable yield."*	These statements are incorrect. The project would ensure that existing inflows continue, which maintains status quo, as opposed to adding water to the ELPMA water balance.
BB-TC-12	Bryan Bondy	Technical	--	43	Section 3.2.2	*Text states the project would "reduce the dependence on imported water in the LPVB by providing new local potable supplies" and later states the project will "reduce groundwater demands in the LPVB."*	These statements appear to be in conflict. Please provide information about anticipated reductions in groundwater demand vs. reduction in imported water purchases. In other words, what is the anticipated net benefit to the ELPMA water balance?
BB-TC-13	Bryan Bondy	Technical	New Data for ELPMA	51	Section 4.1.1.1	*No new information is available that would improve or update the understanding of the hydrogeologic conceptual model of the ELPMA and Epworth Gravels Management Area.*	Calleguas has constructed three multi-level groundwater monitoring wells, which provides new stratigraphic data for the hydrostratigraphic model. In particular, 03N19W30E07 is a nested monitoring well that provides data to better characterize the Epworth, FCA, and GCA in northern ELPMA and 02N20W11B01-3 is a clustered monitoring well that provides data better characterize the Upper San Pedro Formation and FCA south of the Moorpark Anticline in the ELPMA. In addition, groundwater level data collected from these wells can be used to characterize vertical gradients. These data should be incorporated into the Hydrogeologic Conceptual Model.
BB-TC-14	Bryan Bondy	Technical	Data Gaps in the HCM	52	Section 4.2; Table 4-1	--	Text states that no additional information has been collected to address data gaps. Please see prior comment. New data from Calleguas' multi-level groundwater monitoring wells helps address the data gaps listed in Table 4-1.
BB-TC-15	Bryan Bondy	Technical	WLPMA Model Update		Section 5.1.1, Table 2-4b	--	Review of the modeling for the WLPMA cannot not be completed at this time because documentation of the Coastal Plan model is not yet available. Based on review of the GSP evaluation, there are several issues with the Coastal Plain model that appear worthy of further review in consultation with the TAC. Additional items worthy of further review may be identified after documentation review. The issues identified based on the GSP evaluation review include (1) conversion of the WLPMA-ELPMA model boundary from no-flow to general head, (2) inconsistency between the model LAS water balance (Table 2-4b), which indicates little to no underflow from the Oxnard Subbasin into WLPMA in contrast with spring groundwater elevation contours in the annual reports that suggest there is underflow from the Oxnard Subbasin into WLPMA; (3) groundwater exchange between Pleasant Valley Basin and WLPMA; and (4) groundwater exchange between ELPMA and WLPMA.

Specific Comments from the Las Posas Valley Basin Technical Advisory Committee
Draft First Periodic Evaluation, Groundwater Sustainability Plan (GSP) for the Las Posas Valley Basin

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment
BB-TC-16	Bryan Bondy	Technical	WLPMA Modeling and Sustainable Yield Estimate for WLPMA		Section 5.2.2.1 and Section 5.2.3.1	--	While assessment of impacts on adjacent basins is clearly required under SGMA, the framing and analysis of WLPMA impact on Oxnard Basin and the approach to estimating WLPMA sustainable yield seem problematic for multiple reasons. First the analysis has not isolated the impact of WLPMA pumping on seawater intrusion for technical evaluation and consideration in policy making. Second, the analysis of the interaction between WLPMA and the Oxnard Subbasin appears to ignore the fact that numerous WLPMA groundwater pumpers pay pump fees to UWCD. This is evident in the discussion of the underflows from Oxnard Subbasin into WLPMA, which are characterized as a "losses of underflow recharge" to the Oxnard Subbasin. The implication is that WLPMA is taking water away from the Oxnard Subbasin, when, in fact, many pumpers have paid for the benefit of underflow from UCWD's recharge operations. Consideration should be given to reframing analysis of WLPMA impacts on seawater intrusion and WLPMA sustainable yield to account for underflow that is paid for by WLPMA extraction fees paid to UWCD and additional analysis that isolates the actual influence of WLPMA pumping on seawater intrusion.
BB-TC-17	Bryan Bondy	Technical	Future Baseline with EBB Results	85	Section 5.2.2.1.6	--	Regarding the Future Baseline with EBB scenario, the text states "These results indicate that groundwater production at the average 2016 to 2022 rates in the Oxnard Subbasin, PVB, and WLPMA may be sustainable if UWCD's EBB project is implemented at a 10,000 AFY production scale." It is unclear how this scenario can be considered sustainable for the WLPMA because Figures 5-23a and b show minimum threshold exceedances for this scenario.
BB-TC-18	Bryan Bondy	Technical	ELPMA Future Baseline Scenario		Section 5.2.2.2.1	--	Please incorporate the table produced for TAC titled "Summary of Annual Discharges Simulated in the East Las Posas Model (2040-2069 Average" into the evaluation report in this section as it provides important context for technical evaluation of the scenarios.
BB-TC-19	Bryan Bondy	Technical	--	91	Section 5.2.3.2	--	Average ELPMA pumping 2021-2022 value of 23,800 incorrectly includes Epworth Gravels pumping and should be reduced to 23,400 (see Table 4-4). After making that correction, the amount of extraction in excess of the upper estimate of sustainable yield becomes 1,900 AFY and should be updated.
BB-TC-20	Bryan Bondy	Technical	--	92	Section 5.2.3.3	--	The 2021-2022 average annual extractions from the Epworth Gravels is incorrectly reported as approximately 900 AFY and being approximately 450 AFY lower than the estimated upper end of the sustainable yield. Per Table 4-4, the 2021-2022 average annual extractions should be approximately 460 AFY, which is approximately 890 AFY lower than the estimated upper end of the sustainable yield.
BB-TC-21	Bryan Bondy	Technical	Monitoring Network		Section 6	--	Consideration should be given to incorporating the three multi-level monitoring wells constructed by Calleguas in the ELPMA into the monitoring network. These monitoring well nests/clusters provide valuable aquifer specific data, including much needed data for the Grimes Canyon Aquifer at one location. Data from these wells are already provided to FCGMA by Calleguas MWD on a regular basis.

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BB-TC-22	Bryan Bondy	Technical	Revisions to CMWD Monitoring Network	95	Section 6.1; Table 6-2	*Four of the wells have been removed from the monitoring network because they were either destroyed or CMWD had recurring access issues.*	Calleguas has not had access issues. The following are clarifications concerning the wells listed in Table 6-2: • Well 03N20W32H02S has been dry for numerous years. Calleguas continues to check the well for water and will reinstall a transducer if water returns. Consider retaining in monitoring network pending increasing groundwater levels. • Well 02N20W02D02S was destroyed by the owner. • Well 03N20W36P01S has a transducer stuck in the sounding tube. The transducer will be reinstalled the next time the well pump is removed. • Well 03N20W35J01S is continuing to be monitored with a transducer. However, the groundwater levels are considered anomalous. It is recommended that this well be removed from the monitoring network due to anomalous data. • Well 02N20W01B02 is noted as being added to the monitoring network in Table 6-2. This is not correct. This well was already included in the monitoring network in the GSP. Table 6-2 says no water quality sampling. This is not correct. Water quality samples are collected according to satisfy Division of Drinking Water requirements and are available from Calleguas or from the SWRCB website. Calleguas has added its three multilevel groundwater monitoring wells to its monitoring network.
BB-TC-23	Bryan Bondy	Technical	Change in CMWD Monitoring Schedule	96	Table 6-3	--	Table 6-3 indicates that several wells are “no longer monitored” for water quality. It is noted that Calleguas has never sampled these wells (except once for monitoring wells immediately following construction). FCGMA incorrectly assumed that Calleguas was sampling these wells. Well 02N19W06F01S is an agricultural well, not a monitoring well. Well 02N20W09Q08S is a monitoring well, not a municipal well.
BB-TC-24	Bryan Bondy	Technical	Water Level Measurements: Temporal Data Gap, p. 98	98	Section 6.2.2.2	*Currently, groundwater elevation measurements are not scheduled according to these criteria because FCGMA relies on monitoring by several other agencies. To minimize the effects of this type of temporal data gap in the future, it would be necessary to coordinate the collection of groundwater elevation data, so it occurs within a 2-week window during the key reporting periods of mid-March and mid-October. The recommended collection windows are October 9–22 in the fall and March 9–22 in the spring.*	Calleguas and VCWWD have transducers installed in all the wells in their monitoring network. The only reason data may be missing for these wells during the fall and spring two-week windows is if a transducer has failed and is pending reinstallation. FCGMA is encouraged to coordinate with Calleguas and VCWWD to facilitate determine an approach for collection of manual groundwater level measurements to address the fall and spring window data needs.
BB-TC-25	Bryan Bondy	Technical	Water Level Measurements: Temporal Data Gap, p. 98	98	Section 6.2.2.2	*Additionally, as funding becomes available, pressure transducers should be added to wells in the groundwater monitoring network.*	It is noted that Calleguas and VCWWD already have transducers installed in all the wells in their monitoring network.
BB-TC-26	Bryan Bondy	Technical	Water Level Measurements: Temporal Data Gap, p. 98	98	Section 6.2.2.2	*Since adoption of the GSP, 13 wells that were to be monitored for groundwater quality are no longer monitored for groundwater quality. The majority these wells, 11 of the 13 wells, are representative monitoring wells located in the ELPMA.requirements.*	As noted in comment BB-TC-23, Calleguas never committed to sample the wells in its monitoring network, other than ASR wells, which are sampled to comply with Division of Drinking Water requirements.
BB-TC-27	Bryan Bondy	Technical	Data Gaps	97	Section 6.2	--	Consideration should be given to reevaluating data gaps in consultation with TAC after FCGMA staff have met and conferred with the monitoring entities.
BB-TC-28a	Bryan Bondy	General Technical	Potential Additional Report Elements	--	--	--	1.Consideration should be given to including groundwater level contour maps. Perhaps the annual report figures could becompiled into an appendix.

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BB-TC-28b	Bryan Bondy	General Technical	Potential Additional Report Elements	--	--	--	2.Consideration should be given to including discussion concerning whether there were any notable changes in the spatialdistribution of pumping in the management areas.
BB-EC-1	Bryan Bondy	General Editorial	Figure References	--	--	--	The reviewer noticed a number of incorrect figure and table number references in the text. Consider QC'ing.
BB-EC-2	Bryan Bondy	Editorial	--	120	Figure 2-2	--	Wells 18H12 and 17L01 (WLPMA) and 01Q02 (ELPMA) are depicted as RMP/Key Wells but are not identified as such in the GSP and are not listed in Table 2-2.
BB-EC-3	Bryan Bondy	Editorial	--	120	Figure 2-2	--	RMP/Key Well 35R02 is missing on Figure 2-2.
BB-EC-4	Bryan Bondy	Editorial	--	ES-3	2nd full paragraph	*...14 key wells in the ELPMA...*	per Table 2-2 and the GSP, there are 15 (13 FCA and 2 Shallow Aquifer).
BB-EC-5	Bryan Bondy	Editorial	--	122 and 124	Figures 2-3 and 2-4	--	These figures are a clever approach to communicating status relative to the SMCs. However, while the graphics in the lower half of the figures are intuitive, they are misleading because the scale for each well is different. This is most evident in the fact that the distance between the MO and MT lines are same for each well when the actual distance between MO and MT ranges from 20 to 100 feet. Additionally, wells appear closer or further from their respective MO / MT relative to other wells than they actually are. For example, the Spring 2024 groundwater levels for 26R03 and 01B02 on Figure 2-4 visually appear to be very different heights above their respective MOs but are actually about the same (24 and 23 feet, respectively). At a minimum, the bottom graphics should be noted as being not to scale and that the graphics for the various wells are not comparable. Preferable, the graphics would be adjusted to that all wells are at the same scale and the actual distances between MO and MT for each well are depicted.
BB-EC-6	Bryan Bondy	Editorial	--	ES-4	1st paragraph	--	The values in this paragraph are incorrect: • Average WLPMA pumping 2021-2022 was 4,000 AFY more than the upper estimate of sustainable yield, not 3,100 AFY (see value reported on p. 90). • Average ELPMA pumping 2021-2022 was 1,900 AFY more than the upper estimate of sustainable yield, not 2,300 AFY (note: although 2,300 is reported on p. 91, the pumping used for the calculation incorrectly includes Epworth Gravels pumping).
BB-EC-7	Bryan Bondy	Editorial	--	1	Table 1-1, 2nd row	--	Consider also mentioning Simi Valley dewatering wells here, i.e., the City of Simi Valley is no longer planning to divert dewatering well discharges to a desalter for potable use.
BB-EC-8	Bryan Bondy	Editorial	--	6	Section 2.2 second paragraph	--	Per Figure 2-4, groundwater elevations were measured in 16 of the 21 key wells, not 15 as indicated in the text.
BB-EC-9	Bryan Bondy	Editorial	--	24	Table 2-5	--	WLPMA – LAS estimated 2016-2024 change in storage value is incorrect. S/B -32,970
BB-EC-10	Bryan Bondy	Editorial	--	52	Section 4.1.3.1	--	It is unclear what new information has been incorporated into understanding of recharge areas.
BB-EC-11	Bryan Bondy	Editorial	--	55	Section 4.3.2.1	--	Text states "Available data characterizing groundwater extractions in water years 2021 and 2022 indicate that groundwater extractions from the LPVB averaged approximately 42,400 AFY (Tables 4-3 and 4-4)." Per the referenced tables, the value cited in the text should be 40,400 AFY.
BB-EC-12	Bryan Bondy	Editorial	--	Table 4-4		--	WY 2022 Epworth Gravels Aquifer extraction value appears anomalously low. Consider investigating and/or footnoting.
BB-EC-13	Bryan Bondy	Editorial	--	Table 4-4		--	Please footnote table to clarify whether values include Calleguas MWD extractions.
BB-EC-14	Bryan Bondy	Editorial	--	68-69		--	Something is wrong with the transition from p. 68 to p. 69.
BB-EC-15	Bryan Bondy	Editorial	--	86	Section 5.2.2.2.1	--	Second bullet – the wrong model is referenced.
BB-EC-16	Bryan Bondy	Editorial	--	Table 6-1		--	Explanation for footnote "a" is missing.
BB-EC-17	Bryan Bondy	Editorial	--	98		--	"CGMA" s/b "FCGMA"

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BA-1	Bob Abrams	General Technical	Groundwater Monitoring	--	--	--	Overall, monitoring in the LPVB could be improved. Many key wells have not been monitored and no reasons for this are provided. For example, key well 02N20W06R01S, which has been below the water-level minimum threshold, was not monitored in 2024. The lack of monitoring seems particularly true in the West Las Posas Management Area (WLPMA), where there are five key wells but only two or three are ever monitored. The lack of explanation could be interpreted to mean that the Fox Canyon Groundwater Management Agency (FCGMA) is trying to downplay this issue.
BA-2	Bob Abrams	General Technical	Projects and Management Actions	--	--	--	In terms of projects benefitting the LPVB, the evaluation appears to indicate that action is being delayed because of the Judgment and Basin Optimization Plan. For example, it appears that FCGMA has spent most their time on the Oxnard Basin model, work that was done by United Water Conservation District (UWCD). This seems to be the only substantive management action that has moved forward in LPVB.
BA-3	Bob Abrams	General Technical	Grimes Canyon Aquifer	--	--	--	The Grimes Canyon Aquifer (GCA) seems to be mentioned then ignored. In WLPMA, where data are particularly sparse, it just gets lumped into the Lower Aquifer System (LAS).
BA-4	Bob Abrams	General Technical	Recharge Figures	--	--	--	Figure 4-1 that shows recharge areas for Fox Canyon Aquifer (FCA). Why no equivalent figure for the GCA recharge area?
BA-5	Bob Abrams	General Technical	Water Quality	--	--	--	There are indications of deteriorating groundwater quality in localized areas. The Evaluations states that this is not related to pumping, but no explanation is given for why for the local concentration increases. Is water from the Upper San Pedro possibly being pulled down by pumping?
BA-6	Bob Abrams	General Technical	Groundwater Monitoring	--	--	--	FCGMA appears to source most or all of the necessary monitoring data from other agencies. Thus, there is no apparent direct culpability if data are not collected.
BA-7	Bob Abrams	General Technical	Groundwater Modeling	--	--	--	A large amount of new modeling work for the Oxnard Basin is presented. This work is only slightly relevant to the WLPMA of LPVB, but much attention is devoted to describing this work in the Evaluation. The many particle tracking figures presented do not appear to be relevant to the Evaluation.
BA-8	Bob Abrams	Editorial	--	ES-1	Footnote 1	--	Not sure what this is referring to?
BA-9	Bob Abrams	Editorial	--	ES-1	Footnote 2	*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 2024 begins on October 1, 2024 and will end on September 30, 2025.*	Need to explain how this apparent mismatch will be managed in the document and in future. Water Year and Court Water Year (when required)?
BA-10	Bob Abrams	Editorial	--	ES-2	--	*Because the Judgment is still being implemented and subject to appellate court review, its effect on FCGMA's implementation of the LPVB GSP and sustainable management of the LPVB is uncertain.*	Not clear what this sentence achieves? Suggest re-wording or deleting.
BA-11	Bob Abrams	Technical	--	ES-2	--	--	Groundwater elevations in the GCA in WLPMA are not mentioned? This is inconsistent, as it is mentioned for ELPMA Need to mention that there are few wells in the GCA in WLPMA and this is an area of uncertainty? Or is it the intention to call the FCA/GCA the LAS in WLPMA as per Table 2.2 and brush over the lack of aquifer specific wells?
BA-12	Bob Abrams	Editorial	--	ES-2	--	*Groundwater elevations central ELPMA near the CMWD ASR well field*	Suggested addition in red text: Groundwater elevations in central ELPMA near the CMWD ASR well field

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BA-13	Bob Abrams	Editorial	--	ES-4	--	*groundwater levels in the WLPMA should be maintained at elevations that are high enough to not inhibit the ability of the Oxnard Subbasin to prevent net landward migration of the saline water impact front*	Can this be re-written? This is expressed more clearly on page 17 as "…groundwater levels, significant and unreasonable loss of groundwater in storage, and, in the WLPMA, will not prevent the Oxnard Subbasin from achieving its sustainability goal"
BA-14	Bob Abrams	Editorial and Technical	--	ES-4	--	*The largest administrative uncertainty is related to how the LPVB Judgment will impact FCGMA's ability to implement the GSP and sustainably manage the LPVB,*	This is a subjective comment and could be deleted. Or the red text could be added. Suggest this document should focus on technical uncertainties rather than administrative. "The largest administrative uncertainty is related to how the LPVB Judgment will impact FCGMA's ability to implement the GSP and sustainably manage the LPVB,"
BA-15	Bob Abrams	Technical	--	10	--	*Groundwater elevation was not measured in well 02N20W12MMW1 in water year 2024*	Is it worth noting the reason why the elevation was not measured in this key well? Leaving it as unexplained reduces the robustness of data reporting.
BA-16	Bob Abrams	Technical	--	11	Table 2.2		The Table would be stronger if there was a column or note explaining why key wells were not measured, otherwise it looks like poor groundwater management – there are lots of '-' cells indicating data not collected, which is obviously disappointing.
BA-17	Bob Abrams	Editorial	--	13	FCA third paragraph	*Fall groundwater elevations decreased ~~from~~ by less than a foot to 48 feet*	To avoid confusion - the 'from' in the sentence could be read as ft msl, when the intention is to show the change in elevations. Previous paras and next sentence are clearer.
BA-18	Bob Abrams	Technical	--	13	GCA	*Sufficient measurements were not collected by the monitoring agency to evaluate the change in groundwater elevation for fall 2015 to fall 2023 and spring 2015 to spring 2024.*	Explain the reasons and note that it remains an area of uncertainty? Otherwise, it looks like it is being glossed over.
BA-19	Bob Abrams	Editorial	--	15	--	*Fall 2023 groundwater elevations were below the 2025 interim milestones in ~~the~~ two of the key wells in the WLPMA*	typo
BA-20	Bob Abrams	Technical	--	19	1st paragraph	*The lack of measurements at these two wells creates data gaps in the characterization of groundwater conditions within the LPVB.*	Is there any proposal to replace these two key wells with new or other wells? It would counterbalance the negative.
BA-21	Bob Abrams	Editorial and Technical	--	22	Table 2-4b	--	Title of last "Outflow" column is "Subsurface flow to the ELPMAa" Footnote "a" states, "Represents simulated underflows from the East Las Posas Management Area" Do these contradict? Footnote should say "to"? With respect to flow from WLPMA to ELPMA, reference Section 5.1.1 because new finding and still being evaluated.
BA-22	Bob Abrams	Editorial	--	23	Table 2-4c	--	First column of "Outflow" is "Outflow to PV1" Should that be PVB?
BA-23	Bob Abrams	Technical	--	26	Table 2-6	--	Column labeled "Aquifer" has many instances of "Unknown" Can the aquifer be ascertained by well depth, well completion data, local stratigraphy, well chemistry etc? Collecting data from wells without knowing the aquifer diminishes the value of that data. Doing statistics on data of unknown provenance is questionable/not robust
BA-24	Bob Abrams	Technical	--	28	4th paragraph ELPMA groundwater quality	*While recent data doesn't suggest a link between groundwater quality degradation and groundwater production during the evaluation period*	Increasing trends are noted in a number of wells. While the conclusion is that there is no link between increasing trends and GW production, there is a notable absence of explanations for the increasing trends. If not GW production, then what local conceptual site model is postulated to cause the increases?
BA-25	Bob Abrams	Technical	--	28	2.5.2.1 WLPMA	*TDS concentration data do not indicate that groundwater production since 2015 has caused degradation of groundwater quality*	The previous sentence suggests increases are occurring in wells completed in the USP, but not in the FCA/GCA. Would a hypothetical conceptual model be that groundwater production is pulling higher TDS water down from the USP and that there is a link? What is the TDS of USP groundwater?
BA-26	Bob Abrams	Editorial	--	40	3.1.2.3.2 last sentence	*A formal agreement to ensure future maintenance of these non-native flows will be evaluated ~~as~~ through the Basin Optimization Plan.*	typo

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BA-27	Bob Abrams	Technical	--	41	Table 3-1	*Estimated Accrued Benefits at Completion: Recovery of groundwater levels that have contributed to seawater intrusion in the Oxnard Subbasin.*	Is not the biggest benefit of reduced groundwater production the reduced possibility of adverse effects, rather than a specific effect in Oxnard Subbasin?
BA-28	Bob Abrams	Technical	--	51	4.1.1.1.	*Projects have been identified to install additional monitoring wells and transducers in existing wells that would address data gaps in the ELPMA*	Why none in the WLPMA?
BA-29	Bob Abrams	Editorial	--	64	4.3.2.3	*Between 2003 and 2022, recycled water in the ELPMA was used exclusively for municipal and industrial uses.*	Missing word?
BA-30	Bob Abrams	Editorial	--	70	5.2.1.3	*climate change factors ;, with the noted exception that*	typo
BA-31	Bob Abrams	Editorial	--	73	5.2.2	*...model runs that resulted in: (1) no net flux of seawater into either the UAS or LAS of the Oxnard Subbasin, ;*	typo
BA-32	Bob Abrams	Technical	--	226 and 228	Figures 5-23a, b	--	Why are the simulated hydrographs shifted by -60 and +70 feet?
BA-33	Bob Abrams	Technical	--	73	5.2.2	*Due to the connection between the WLPMA and Oxnard Subbasin, the sustainable yield was evaluated using the model runs that resulted in: (1) no net flux of seawater into either the UAS or LAS of the Oxnard Subbasin,, (2) no landward migration of the saline water impact front in the Oxnard Subbasin, and (3) no chronic lowering of groundwater levels in WLPMA.*	Understood that the subbasins are connected, but shouldn't the focus of sustainability be on the LPVB? The numerous particle tracking figures don't even show the LPVB. What is a LPVB stakeholder supposed to think about this?
BA-34	Bob Abrams	Editorial	--	89	--	*No New Projects Scenario Model Results*	Should this be 'Arundo Removal Scenario Model results'?
BA-35	Bob Abrams	Technical	--	97	6.2.2.	*the existing monitoring network in the LPVB is sufficient to document groundwater and can be used to document progress toward the sustainability goals for the LPVB.*	The loss of key well monitoring wells has not really been addressed – either the GSP had too many key wells, or this statement isn't really true?
BA-36	Bob Abrams	Editorial and Technical	--	98	6.2.2.1	*The removal of 02N21W16J03S limits characterization of groundwater conditions in the eastern part of WLPMA, where groundwater elevations are influenced by operations in the Oxnard Subbasin*	Typo. Also, are GW elevations in the eastern part of WLPMA influenced by Oxnard? More likely wells in western part of WLPMA?
BA-37	Bob Abrams	Technical	--	98	6.2.2.1	*As noted above, FCGMA anticipates evaluating projects that help to fill these critical data gaps as part of the Basin Optimization Plan*	Insufficient urgency demonstrated? Only one new well installed since 2019.
BA-38	Bob Abrams	Editorial	--	107	8.3	*with FCGMA holding regular meetings ~~with~~ to coordinate on projects*	typo
BA-39	Bob Abrams	Editorial	--	110	9.3	*Because the Judgment is still being implemented and subject to appellate court review, the effect of the Judgment on FCGMA's implementation of the LPV GSP and sustainable management of the LPV Basin is uncertain at this time.*	Not clear what this sentence achieves? Suggest rewording or deleting (ame as p ES-2, above)
BA-40	Bob Abrams	Editorial	--	112	10	*~~Revisions~~ Reductions to the monitoring network, including the key well network*	The word "reduction" is a more accurate representation of facts

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TM-1	Tony Morgan	Editorial	--	ES-1	Table ES-1, 4th row, last column	--	subsidence is not discussed in Section 7.2
TM-2	Tony Morgan	Technical	--	7	2.2.1.1	*prevent chronic lowering of groundwater levels*	is chronic lowering of water levels currently a WLPMA condition? That message doesn't seem to be a prevalent message throughout the document.
TM-3	Tony Morgan	Technical	--	7	2.2.1.2, first paragraph	*to limit the area of the FCA that would convert from confined to unconfined conditions with declining water levels,*	the undesirable condition is a conversion of the aquifer from confined to unconfined. The following paragraph moves from a discussion of the aquifer transitioning from confined to unconfined, to an individual well?
TM-4	Tony Morgan	Technical	--	7	2.2.1.2, second paragraph	*would result in projected groundwater elevations that are below the top of the well screen in nine wells*	declines in water levels to below the top of screen does not necessarily equate to the dewatering of the aquifer. Not clear how this analysis helps assess the potential for CONF-UNCONF conversion. A more powerful analysis would be to determine the tops of the confined aquifer and then compare to a declining water level.
TM-5	Tony Morgan	Editorial	--	24	2.3.2.1, Lower Aquifer System	*approximately 32,970 AF since 2015 (Table 2-5)*	value doesn't match Table 2-5
TM-6	Tony Morgan	Editorial	--	24	Table 2-5., West Las Posas / LAS row	--	-34,780+1,810 = -32,970
TM-7	Tony Morgan	Technical	--	26	2.5.1	*describe efforts to evaluate the connection between groundwater production and groundwater quality*	Was this accomplished in the document?
TM-8	Tony Morgan	Technical	--	26	2.5.1	*progress made toward evaluation of the causal relationship referenced in the GSP.*	Where is this addressed in the document?
TM-9	Tony Morgan	Technical	--	28	2.5.1.2, last paragraph	*While recent data doesn't suggest a link between groundwater quality degradation and groundwater production during the evaluation period,*	Where are these data presented?
TM-10	Tony Morgan	Technical	--	32	2.6.2	*critical infrastructure*	What are the criticial infrastructure? Their location(s) are not shown on Fig 2-29.
TM-11	Tony Morgan	Editorial	--	35	3	*Both the Basin Optimization Plan and Basin Optimization Yield Study are developed by FCGMA, as Watermaster for the LPVB, with consultation, review, and recommendation from the LPVB PAC and TAC.*	Change to: "Both the Basin Optimization Plan and Basin Optimization Yield Study are planned to be developed by FCGMA, as Watermaster for the LPVB, with consultation, review, and recommendation from the LPVB PAC and TAC."
TM-12	Tony Morgan	Technical	--	37	3.1.1.1.3, Impacts to beneficial uses and users	*potential groundwater-surface water connections.*	these connections are not highlighted/identified in this document. Why mention them here?
TM-13	Tony Morgan	Technical	--	39	3.1.2.1.2, Expected Benefits	*prevent declines in groundwater elevation, loss of storage, and land subsidence by*	These benefits are logical, but are they actually needed to lessen declines in groundwater elevations, loss of storage, or land subsidence. Other sections in this document do not identify undesirable results associated with them (e.g., subsidence).
TM-14	Tony Morgan	Technical	--	39	3.1.2.1.2, Impacts to beneficial uses and users	*chronic lowering of groundwater levels,*	is chronic lowering of groundwater a risk in the WLPMA?
TM-15	Tony Morgan	Editorial	--	40	3.1.2.3.2, Realized Benefits, second paragraph	*A formal agreement to ensure future maintenance of these non-native flows will be evaluated ~~as~~ through the Basin Optimization Plan.*	typo
TM-16	Tony Morgan	Editorial	--	41	Table 3-1, first row, second column	*Reduce Groundwater production by monitoring and imposing quantitative limits on pumpers; with governing authority from the FCGMA Board as the Watermaster .*	recommend adding red text
TM-17	Tony Morgan	Editorial	--	42	3.2.1.1	*decrease groundwater demand in the LPVB by 2,300 AFY.*	section below says groundwater demand would be decreased by 500 AFY
TM-18	Tony Morgan	Editorial	--	42	3.2.1.2, Expected Benefits	*It is estimated that implementation of this project would decrease groundwater demand in the LPVB by approximately 500 AFY.*	paragraph above says groundwater demand would be decreased by 2,300 AFY

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TM-19	Tony Morgan	Technical	--	43	3.2.1.2, Expected Benefits	*which directly addresses undesirable results associated with degraded water quality,*	what degraded water quality impacts are attributable to the GSP's management of the basin?
TM-20	Tony Morgan	Technical	--	43	3.2.1.2, Expected Benefits	*reducing groundwater demands in the LPVB.*	how does the pumping of groundwater to supply the desalter achieve a reduction in groundwater demands?
TM-21	Tony Morgan	Technical	--	43	3.2.1.2, Impacts to beneficial uses and users	*helping to prevent groundwater elevation declines*	the desalter needs a source of water to treat - groundwater. Not clear how this project reduces groundwater demand and therefore prevents groundwater elevation decline.
TM-22	Tony Morgan	Technical	--	44	3.2.3.1	*would provide up to 2,000 AFY of recharge.*	how much of the 2,000 AFY of recharge would have normally been recharged downstream of the percolation ponds or in the PVB? Is this expected to be 2,000 AFY net of the "normal" recharge?
TM-23	Tony Morgan	Technical	--	45	3.2.4.1	*would provide data on whether the vegetation in the riparian corridor relies on groundwater or soil moisture from infiltrating surface water.*	other sections stated that vegetation is not dependent on groundwater. This seems to be backtracking on the conclusions offered elsewhere.
TM-24	Tony Morgan	Editorial	--	54	4.3.2.1	*approximately 35,100 AFY of groundwater*	Recommend changing to "...an average of approximately 35,100 AFY of groundwater..."
TM-25	Tony Morgan	Technical	--	77	Table 5-2, first column, second row	*Seawater Flux into the Oxnard Subbasin* [b]	it is a little misleading to show the SWI values as a single number when in reality the modeling results have an error bar associated with them (e.g., 500 AFY +/-200 AFY). The single value presented in the table suggests a more exact rate than we have data to support. Can error estimates be added to the table?
TM-26	Tony Morgan	Editorial	--	77	Table 5-2, footnotes	--	Last footnote should be 'd'
TM-27	Tony Morgan	Technical	--	98	6.2.2.3	*13 wells that were to be monitored for groundwater quality are no longer monitored for groundwater quality.*	Seem appropriate to provide the reader with some idea of why so many wells are no longer monitored. Were the wells destroyed, landowner access denied, data determined to be redundant, monitoring entity dropped these wells from their suite of monitored wells, or ??.
TM-28	Tony Morgan	Technical	--	99	6.4	*monitor subsidence*	Is it anticipated that an annual report will be produced? Will the report address inferred land surface movement near critical infrastructure? If so, what infrastructure?
TM-29	Tony Morgan	Editorial	--	103	7.1.3	*As described in Section 3.1, Evaluation of Projects and Management Actions, the Judgment adjudicated water rights in the basin and established an allocation system based on those water rights. The Judgment allocations supersede the allocations developed and adopted by FCGMA in 2019.*	This paragraph seems to fit better in 7.1.2 Extraction Allocations.
TM-30	Tony Morgan	Technical	--	110	9.3, Las Posas Valley Water rights Coalition, et al. v. Fox Canyon Groundwater Management Agency, Santa Barbara Sup. Ct. Case No. VENC100509700	*adopts a physical solution that requires FCGMA to prepare new studies and reports designed to maintain an annual operating yield for the LPVB at 40,000 AFY*	This GSP puts the sustainable yield at ~27K-34K AFY with projects. The judgment requires a sustainable yield of 40K AFY. What is the GSA (Watermaster?) doing to get to the 40K AFY value? Was this discussed in the GSP?
TM-31	Tony Morgan	Technical	--	Appendix A, A-1	A.1	*identify specific locations where Arroyo Simi-Las Posas is connected to the underlying aquifer and*	Is there a map or ?? showing these locations?
TM-32	Tony Morgan	Technical	--	Appendix A, A-2	A.2, first paragraph on page	*recharge of the surface water discharges*	Helpful to reader to identify these surface water discharges. Can the surface water discharges be quantified (e.g., time series)? What values were used for the groundwater model?
TM-33	Tony Morgan	Technical	--	Appendix A, A-2	A.3, last sentence in first paragraph	*This indicates that groundwater production in the principal aquifers of the ELPMA has not impacted the groundwater level in the shallow alluvial aquifer adjacent to the Arroyo near well MMW-1.*	This implies limited interconnection between the principal and shallow aquifers. Is this conclusionary statement consistent with the findings from the groundwater flow model? If so, suggest stating the model is supportive of these observations. If not, then why the difference.

Specific Comments from the Las Posas Valley Basin Technical Advisory Committee
Draft First Periodic Evaluation, Groundwater Sustainability Plan (GSP) for the Las Posas Valley Basin

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment
TM-34	Tony Morgan	Technical	--	Appendix A, A-2	A.4, first paragraph	*interconnected surface water bodies*	Were the interconnected surface water bodies identified?
TM-35	Tony Morgan	Editorial	--	Appendix A, A-2	A.4, first paragraph	*has not occurred in relation to current groundwater production, although this could occur in the future if upstream surface water discharges decrease.*	is this sentence saying that depletions of interconnected surface waters due to pumping could occur if upstream surface water discharges decrease? Suggest splitting the sentence into two. Add a period after "...groundwater production." Create a new sentence to say "Interconnected surface water bodies could occur in the future if upstream surface water discharges decrease."

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Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment
CT-1	Chad Taylor	Editorial	--	1	Table 1-1, fourth row, second column	*As a result, FCGMA anticipates approximately more flow in Arroyo Simi-Las Posas than previously assumed for the GSP*	Is this a typo, or should a value of additional flow be included here?
CT-1	Chad Taylor	Technical	--	1	Table 1-1	*Infrastructure Improvements to Zone Mutual Water Company's water delivery system*	This project may need to be modified based on feedback from Bryan Bondy regarding ZMWC's ability to finance improvements. TAC recommendations on the projects for the Basin Optimization Plan include changing this to a Basin-wide feasibility study to increase transfers between management areas.
CT-1	Chad Taylor	Technical	--	2	Table 1-1	*Projects to Address Data Gaps, Installation of Additional Groundwater Monitoring Wells and Installation of Additional Groundwater Monitoring Wells*	These are important projects that should be advanced quickly. See later comments on monitoring adequacy.
CT-1	Chad Taylor	Editorial	--	4	2.1, second paragraph on page	*At the time the GSP was prepared, the groundwater elevations were below the minimum threshold groundwater elevations in ~~the at~~ four of the five key wells in WLPMA, the only key well in the Epworth Gravels Management Area, and one well in the ELPMA.*	Typo
CT-1	Chad Taylor	Technical	--	7	2.2.1.2, second paragraph	*The depth and groundwater production rates from the wells in this area indicate that they are agricultural wells and are not domestic or de minimis wells that produce less than 2 acre-feet per year (AFY).*	Recommend showing the all the data included in and results of this analysis in figures and tables. Table 2-1 shows only perforated interval depths, not production rates that would distinguish domestic wells from those for other uses.
CT-1	Chad Taylor	Technical	--	8	Table 2-1, 6th column	--	18 percent of wells (4 of 22) with reduced capacity seems high
CT-1	Chad Taylor	Technical	--	8	Table 2-1, 7th column	--	2 wells out of 22 is 9%. That is a fairly large percentage of wells going dry.
CT-1	Chad Taylor	Technical	--	8	2.2.1.2, second paragraph on page	*Loss of production at the minimum threshold groundwater elevations represents a loss of between 1% and 3% of the total production from the management area.*	The DWR Recommended Corrective Action requested discussion of the effects of the MTs and MOs on beneficial uses and users. This analysis only discusses the MTs. Additionally, contextualizing the reductions in production ability from these wells in the context of the entire production from the management area may not meet DWR expectations regarding effects on beneficial users. Recommend including discussion of effects on individual well owners. Also, will there be a dry well mitigation program in case wells do go dry?
CT-1	Chad Taylor	Technical	--	9	2.2.1.3, first paragraph	*As groundwater elevations decline in the Epworth Gravels aquifer, groundwater users in this management area rest their Epworth Gravels aquifer wells and rely on water from the FCA instead.*	Can this practice be incorporated into a management action?
CT-1	Chad Taylor	Editorial	--	9	2.2.1.3, second paragraph	*The GSP reported on groundwater conditions through fall 2015. The change in water levels since 2015 varies geographically within the LPVB, reflecting both the influence of groundwater extraction and the availability and extent of groundwater recharge in the WLPMA, ELPMA, and Epworth Gravels Management Area.*	This paragraph seems out of place. Is it supposed to follow the header for 2.2.2?
CT-1	Chad Taylor	Editorial	--	9	2.2.2.1 Upper San Pedro Formation	*There are no key wells screened in the USP because it is not a **primary** aquifer…*	Should primary be principal?

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Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment
CT-1	Chad Taylor	Technical	--	9	2.2.2.1 Fox Canyon Aquifer	*In the western part of the WLPMA, adjacent to the Oxnard Subbasin, fall 2023 and spring 2024 groundwater elevations in the FCA were approximately 55 to 35 feet higher than they were in fall 2015 and spring 2015, respectively (Figure 2-7, Fox Canyon Aquifer – Groundwater Elevation Changes from Fall 2015 to 2023, and Figure 2-8, Fox Canyon Aquifer – Groundwater Elevation Changes from Spring 2015 to 2024). Groundwater elevations in this part of the WLPMA were also higher than they were in fall 2019, the start of the current evaluation period (FCGMA 2021). Groundwater elevation recoveries in the western WLPMA since 2015 reflect the influence of UWCD's recharge operations in the Forebay Management Area of the Oxnard Subbasin, which promoted groundwater elevation recoveries in the Oxnard Subbasin of approximately 120 feet between 2015 and 2024 (FCGMA 2024a).*	These statements are based solely on one monitoring well at the extreme western end of the WLPMA. That data limitation should be discussed somewhere.
CT-1	Chad Taylor	Technical	--	10	2.2.2.1, first paragraph on page	*In contrast, groundwater elevations in the eastern part of the WLPMA were lower in the fall of 2023 than they were in fall 2015 (Figures 2-7)8. The largest groundwater elevation decline measured over this period was at well 02N20W06R01S, where the fall 2023 groundwater elevation was approximately 80 feet lower than fall 2015 (Table 2-2, Water Year 2024 Groundwater Elevations at Key Wells in the Las Posas Valley Basin; Figures 2-7 and 2-8). Groundwater elevation declines in the eastern WLPMA reflect ongoing groundwater production in an area with limited groundwater recharge.*	The lack of consistent monitoring for comparing water levels may be the cause of the apparent difference between fall and spring comparisons. Inconsistent monitoring makes tracking sustainability very challenging, especially when there are so few Key Wells in the network. This problem may be skewing the assessment of sustainability and should be addressed immediately by adding dedicated monitoring wells that the FCGMA/Watermaster monitors or uses transducers to reliably measure water levels regularly.
CT-1	Chad Taylor	Technical	--	10	2.2.2.1 Grimes Canyon Aquifer	*Two wells, 02N21W28A02S and 02N21W22G01S, had groundwater elevations measured in both spring 2015 and spring 2024.*	Spring to spring declines with no fall comparison due to inconsistent monitoring should raise concern.
CT-1	Chad Taylor	Editorial	--	14	2.2.3.1, first paragraph	*The GSP defined interim milestones for the key wells with groundwater elevations below the measurable objectives, so that groundwater elevations would reach the measurable objectives by 2040 (FCGMA 2019).*	Recommend referencing relevant section discussing Interim Milestones.
CT-1	Chad Taylor	Technical	--	14	2.2.3.1, second paragraph	*FCGMA has relied on other agencies for monitoring data but recognizes the need for more consistent monitoring of groundwater elevations in the WLPMA*	This should be prioritized using available funding sources, not waiting for grant funding as alluded to in other sections. Has the FCGMA considered the Technical Support Services available through DWR? Those may not be available now that the Basin is adjudicated, but worth asking about.
CT-1	Chad Taylor	Editorial	--	14	2.2.3.1, second paragraph	*anticipates that groundwater elevations will rise between 2025 and 2040 with the implementation of projects and management actions in the WLPMA that are consistent with the GSP and Judgment.*	This seems a weak statement without further explanation of the mechanisms for increased groundwater elevations. Specifically, "anticipates' and "will rise" are very passive.
CT-1	Chad Taylor	Editorial	--	14	2.2.3.2	*In 2015, the end of the GSP reporting period, groundwater elevations in the WLPMA were above ~~than~~ the minimum threshold water levels at four of the five key wells in the management area (FCGMA 2019).*	Typo

Specific Comments from the Las Posas Valley Basin Technical Advisory Committee
Draft First Periodic Evaluation, Groundwater Sustainability Plan (GSP) for the Las Posas Valley Basin

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment
CT-1	Chad Taylor	Technical	--	15	2.2.3.2, first paragraph on page	*measured in three of the five key wells were measured in three of the five key wells*	40 percent of key wells were not monitored and 2/3 of those that were monitored were below the MT. The importance of more consistent monitoring cannot be stressed highly enough.
CT-1	Chad Taylor	Editorial	--	15	2.2.3.2, first paragraph on page	*...minimum thresholds (Table 2-1).*	Table 2-2?
CT-1	Chad Taylor	Technical	--	15	2.2.3.2, first paragraph on page	*Spring 2024 groundwater elevations were above the minimum threshold groundwater elevations at all of the key wells measured in the WLPMA*	The spring 2024 measurements also included only 60% of Key Wells and the well that was furthest below the MT in fall 2023 was not included.
CT-1	Chad Taylor	Editorial	--	15	2.2.3.3, first paragraph	*Fall 2023 groundwater elevations were below the 2025 interim milestones in the two the key wells*	missing word
CT-1	Chad Taylor	Editorial	--	15	2.2.3.3, first paragraph	*established interim milestones (Table 2-1).*	Table 2-2?
CT-1	Chad Taylor	Technical	--	17	2.2.5.3	*gained and updated numerical modeling conducted for this periodic evaluation (see Section 5, Updated Numerical Modeling)* ***suggest*** *that these thresholds are appropriate to prevent undesirable results in the LPVB*	This makes it sound like there is uncertainty regarding the effectiveness of the thresholds. Can this be strengthened, or is there significant uncertainty?
CT-1	Chad Taylor	Technical	--	19	2.2.5.3, last sentence of first paragraph on page	*The lack of measurements at these two wells creates data gaps in the characterization of groundwater conditions within the LPVB.*	SGMA characterizes data gaps as "a lack of information that significantly affects the understanding of basin setting or evaluation of the efficacy of the Plan implementation, and could limit the ability to assess whether a basin is being sustainably managed." Data gaps include not only limited geographic representation, but also monitoring sites that are unreliable. Once identified, as GSA must include a description in the GSP that addresses the data gaps (23CCR §354.38.) As noted above, a plan to address these data gaps should be developed and implemented as soon as possible.
CT-1	Chad Taylor	Technical	--	19	2.3	--	While this section does acknowledge that undesirable results have occurred, it does not appear to address the DWR RCA request for discussion of potential effects of MTs and MOs on beneficial uses and users. Recommend including a discussion to this effect to address the DWR request.
CT-1	Chad Taylor	Technical	--	22	Table 2-4b	--	Why does this table show the average and not the total change in storage over the period? The sum of the annual changes in storage is a loss of 34,777 AF, which is 3.3 times the average annual inflow to the WLPMA. By comparison, the total change in storage for the ELPMA over the same period was a loss of 2,824 AF, which is only 10% of the average annual inflow to the management area. Recommend including and discussing the change in storage over the period as it represents significant sustained storage decline.
CT-1	Chad Taylor	Technical	--	24	2.3.2.1, Lower Aquifer System	*During the 2004 through 2010 period, the VRGWFM estimates that groundwater in storage in the LAS increased by approximately 1,810 AF (Table 2-5).*	Please explain this calculation. As presented it appears that the change in storage for the entire period of 2004 through 2010 was an increase of 1,810 AF, but the table makes it appear to be an estimate of annual storage change.
CT-1	Chad Taylor	Editorial	--	24	Table 2-5, second row, 6th column	*-35,970*	should this be -32,970 as in the text above?
CT-1	Chad Taylor	Editorial	--	24	Table 2-5, East Las Posas information	--	Recommend explaining how the values in this table relate to those in Table 2-4c

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Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment
CT-1	Chad Taylor	Technical	--	26	Groundwater Quality	--	DWR's RCA for water quality included a request to further describe efforts to evaluate connections between groundwater production and quality, including evaluation of the "casual relationship" referenced in the GSP and document details of a process for determining if groundwater management and extraction are causing adverse impacts to groundwater quality. This discussion and documentation do not appear to have been included and neither is there a statement addressing DWR's request.
CT-1	Chad Taylor	Technical	--	27	2.5.1.1	*Water quality in this area has been impacted by historical land uses and is generally tied to groundwater elevation (FCGMA 2019).*	This references the "casual relationship" DWR mentioned, but does not explain the reasons behind the statement or provide any plan for further assessment. Recommend being very careful about statements concerning connections between groundwater elevations and quality without evidence.
CT-1	Chad Taylor	Technical	--	31	2.5.4	*changes in the groundwater quality do not appear to be correlated with decreases in groundwater elevation.*	Section 2.5.1.1. says there is a relationship. See comment on that section.
CT-1	Chad Taylor	Technical	--	42	3.2.1	--	This project may need to be revised based on recent information presented to the TAC. See TAC Recommendation Report on the Basin Optimization Plan projects.
CT-1	Chad Taylor	Technical	--	44	3.2.4	--	Recommend advancing this project as quickly as possible
CT-1	Chad Taylor	Technical	--	45	3.2.5	--	Recommend advancing this project as quickly as possible
CT-1	Chad Taylor	Technical	--	51	4.1.1.1, second paragraph	*These revisions are described in FCGMA (2024a).*	Please include information regarding the understanding of the LPVB and relevant information about the connection to Oxnard in this document.
CT-1	Chad Taylor	Technical	--	55	4.3.2.1, Comparison to Projected Groundwater Supplies	*approximately 10% lower than the average annual groundwater extractions over the 2021 and 2022 water years.*	42,400 - 36,100 = 6,300 AFY, and 6,300/42,400 = 15% (14.858).
CT-1	Chad Taylor	Technical and Editorial	--	67	5.1.1, third paragraph	*These updates are summarized in FCGMA (2024a).*	Please include all new information relevant to the LPVB in this document
CT-1	Chad Taylor	Technical	--	68	5.1.1, first paragraph on page	*of the fault. As a result, the Coastal Plain Model simulates subsurface flows from the WLPMA to the ELPMA (Table 2-4c). These modeled flows are not integrated into the modeling conducted for the ELPMA.*	Why are the modeled flows between WLPMA and ELPMA not integrated into the modeling for the ELPMA? This raises a concern that the two LPVB management areas are not being modeled in a similar or complimentary way. The statement implies that the ELPMA model still uses a no flow boundary at the Somis Fault, which would be expected to produce very different flow and water budget results when compared to the Coastal Plain model that has a partial general head boundary along the fault. The potential for flow between ELPMA and WLPMA in the coastal plain model may also have an impact on seawater intrusion in Oxnard, and that potential is not discussed. Recommend reconsidering the disparity in the way the Somis Fault is modeled in the Coastal Plain and ELPMA models.
CT-1	Chad Taylor	Technical and Editorial	--	68	5.1.1, third paragraph on page	*A broader discussion of updates to the Coastal Plain Model will be detailed in a technical memorandum prepared by UWCD.*	Where is this document? This seems like important information for the LPVB 5-Year GSP Evaluation
CT-1	Chad Taylor	Technical and Editorial	--	68	5.1.2.1	*The ELPMA model extension, and validation, will be detailed in a technical memorandum prepared by FCGMA.*	When will this be available? Shouldn't this be available for committee review?
CT-1	Chad Taylor	Editorial	--	69	5.1.2.1, first sentence on page	*simulation of future groundwater conditions.*	Sentence fragment
CT-1	Chad Taylor	Technical	--	73	5.2.2	--	How do flows between WLPMA and ELPMA differ in the two models?

Specific Comments from the Las Posas Valley Basin Technical Advisory Committee
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Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment
CT-1	Chad Taylor	Technical	--	78	5.2.2.1.3, No New Projects Scenario Assumptions	--	The percent change referenced for PVB is not consistent with the annual pumping values presented in the assumption summaries. I suspect this is a function of how the information is presented, but it should be checked and the text or percentages/volumes corrected. For instance, in NPP1 the summary says "a 20% reduction in both aquifer systems in the PVB and WLPMA" then references production volumes of "13,200 AFY in the PVB, and 10,800 AFY in the WLPMA." Comparing 13,200 AFY for NPP1 in the PVB to 13,900 AFY in Future Baseline shows a change of -5%, not 20%. All other scenarios have similar results when compared to baseline.
CT-1	Chad Taylor	Technical	--	90	5.2.3.1, Sustainable Yield without Future Projects	*All three simulations performed under the NNP Scenario avoided chronic lowering of groundwater levels in the WLPMA and reduced seawater intrusion in the LAS of the Oxnard Subbasin during the 30-year sustaining period and resulted in net freshwater loss from the UAS of the Oxnard Subbasin to the Pacific Ocean. Therefore, the simulation with the highest overall production rate, that also minimized impacts from adjacent basins, was identified as the best estimate of the sustainable yield of the Oxnard Subbasin, PVB, and WLPMA, in the event that no new future projects are implemented in each basin. The simulation with the highest total groundwater production rate from this scenario was NNP3 – under this simulation, an average of approximately 11,400 AFY of groundwater was pumped from the WLPMA (Section 5.2.2.1.3 No New Projects Model Scenario). This estimate of the sustainable yield is approximately 1,100 AFY lower than the estimate presented in the GSP (FCGMA 2019). Applying the estimate of sustainable yield uncertainty calculated during the development of the GSP for the sustaining period suggests that the sustainable yield of the WLPMA may be as high as 12,600 AFY or as low as 10,200 AFY (FCGMA 2019).*	This appears to be an arbitrary means of estimating sustainable yield. The values listed are simply the results of one of several production reduction scenarios not an assessment of the maximum "amount of groundwater that can be withdrawn annually without causing undesirable results." (DWR BMP for Sustainable Management Criteria, November 2017). The SMC BMP also indicates that sustainable yield should be a single value, not a range as presented here. Please provide more information regarding the methods for estimating uncertainty in the sustainable yield estimate.
CT-1	Chad Taylor	Technical	--	90	5.2.3.1, Sustainable Yield with Future Projects	--	See comment on sustainable yield without future projects regarding how to define sustainable yield.
CT-1	Chad Taylor	Technical	--	90	5.2.3.1, Sustainable Yield with Future Projects, third paragraph	*the sustainable yield of the WLPMA may be as high as approximately 13,040 AFY or as low as 10,640 AFY.*	Please explain how this range was estimated.
CT-1	Chad Taylor	Technical	--	90	5.2.3.1, Sustainable Yield with UWCD's EBB Water Treatment Project	--	See comment on sustainable yield without future projects regarding how to define sustainable yield.
CT-1	Chad Taylor	Technical	--	91	5.2.3.1, Sustainable Yield with UWCD's EBB Water Treatment Project, second paragraph on page	*approximately 14,700 AFY or as low as 12,300 AFY.*	Please explain how this range was estimated.

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Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment
CT-1	Chad Taylor	Technical	--	91	5.2.3.2, Sustainable Yield without Future Projects	--	See comment on WLPMA sustainable yield without future projects regarding how to define sustainable yield.
CT-1	Chad Taylor	Technical	--	91	5.2.3.2, Sustainable Yield without Future Projects, second paragraph	--	Please explain how this range was estimated.
CT-1	Chad Taylor	Technical	--	91	5.2.3.2, Sustainable Yield with Future Projects	--	See comment on WLPMA sustainable yield without future projects regarding how to define sustainable yield.
CT-1	Chad Taylor	Technical	--	97	6.2.2	--	See previous statements about consistency and the effects of data gaps on sustainable management.
CT-1	Chad Taylor	Technical	--	97	6.2.2.1, last paragraph on page	*Importantly, since adoption of the GSP, several groundwater level monitoring wells have been removed from the monitoring network, including two key wells (Figure 6-3):* ▪*02N20W04F02S, which was destroyed; and* ▪*02N21W16J03S, which has not been measured since 2019.*	Is the monitoring network still adequate with the removal of these wells?
CT-1	Chad Taylor	Editorial	--	106	8		Recommend including discussion of the TAC and PAC here as they are outreach, engagement, and coordination components

Item 20B - LPV PAC Recommendation Report

TO: Las Posas Valley Watermaster

FROM: Las Posas Valley Watermaster Policy Advisory Committee

RE: Recommendation Report – Draft Las Posas Valley Basin 5-Year Groundwater Sustainability Plan (GSP) Evaluation

DATE: November 8, 2024

Recommendation:

See memo below for recommended changes/additions to the draft GSP Five-Year Update.

Policy Rationale for Recommendation:

See memo below for rationale.

Summary of Facts in Support of Recommendation:

See memo below for complete memo.

Tally of Committee Member Votes:

	YES	NO	ABSTAIN	ABSENT
Ian Prichard, Callegaus MWD	X			
David Fleisch, VC WWD No. 1 & 19	X			
John Menne, Zone MWC	X			
VACANT, 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:

The report conformed with previous discussions among the PAC regarding the GSP update.

PAC Recommendation Report Regarding the Draft Las Posas Valley Basin Five-Year Groundwater Sustainability Plan (GSP) Evaluation

On August 26, 2024, the Fox Canyon Groundwater Management Agency (FCGMA), serving in its capacity as the Las Posas Valley Basin Watermaster (Watermaster), sent a Committee Consultation request to the Las Posas Valley Policy Advisory Committee (PAC) regarding the Draft Las Posas Valley Basin – 5-Year Groundwater Sustainability Plan (GSP) Evaluation (Draft GSP Evaluation), entitled the First Periodic GSP Evaluation for the LPVB, as prepared by Dudek, the FCGMA's consultant.

Overall, the document is well-done, and the PAC recognizes the significant effort put forth to prepare the Draft GSP Evaluation by the FCGMA and their consultant, Dudek. Together, they have evidently devoted substantial effort to organizing a comprehensive report assessing and documenting groundwater conditions and management strategies.

Following a thorough review, the PAC is submitting this Recommendation Report to provide recommendations for the Watermaster to consider before finalizing the Draft GSP Evaluation for submission to the California Department of Water Resources (DWR). While the PAC submits these recommendations to help improve the Draft GSP Evaluation for submission to DWR, we also recognize the critical role the Draft GSP Evaluation will have as a foundation for amendments to the GSP Update, the 2025 Basin Optimization Yield Study and the Basin Optimization Plan, all of which are key steps toward achieving long-term groundwater sustainability in the Las Posas Valley.

Following are the policy recommendations approved by the PAC on November 7, 2024.

I. MODELING AND DATA ACCURACY

Recommendation 1: Clearly Distinguish Between Model Predictions and Observed Data Throughout the Draft GSP Evaluation

Explicitly label both simulated (modeled) water levels and actual water level measurements in all figures, tables, and discussions. This distinction is crucial for evaluating the model's calibration and its reliability in predicting future groundwater conditions. Accurate calibration, informed by observed data, enhances the model's predictive accuracy.

Recommendation 2: Provide Documentation and Confidence Information for the UWCD Model Used in GSP Evaluation

The documentation for the UWCD model used in the Draft GSP Evaluation has not been made available, leading to reservations within the PAC regarding reliance on a model that has not undergone review by the Las Posas Valley Technical Advisory Committee (TAC). While models aim to replicate real-world conditions, they are inherently imperfect, and confidence in their findings is especially challenging given the limited number of wells (especially in the WLPMA) available for calibration. This limited data set raises concerns about the appropriate confidence interval for the

model results. The PAC recommends that the Draft GSP Evaluation include comprehensive information from the UWCD model, including documentation and details on confidence intervals, to address these concerns and improve transparency.

Recommendation 3: Address Deficiency in Monitoring Data Collection

A considerable portion of the monitoring data required by the GSP was not collected during the review period. This data is critical for evaluating the sustainability of the WLPMA and East Las Posas Management Area (ELPMA) and for ensuring compliance with the Judgment. The PAC recommends that the Draft GSP Evaluation clearly outline how the FCGMA plans to address this deficiency, detailing steps to promptly acquire the necessary monitoring data to support future updates and model runs.

II. CROSS-BASIN AND AREA INTERACTIONS

Recommendation 4: Clarify the Impact of West Las Posas Management Area (WLPMA) Pumping on Oxnard Subbasin Seawater Intrusion

The Draft GSP Evaluation should address the quantifiable relationship between WLPMA pumping and its incremental effect on seawater intrusion in the Oxnard Subbasin. This can be achieved by either including a detailed discussion of this relationship under various management scenarios or by outlining a process and timeline to conduct a focused assessment. Additionally, the PAC recommends that this topic be robustly addressed in the Basin Optimization Yield Study, utilizing the updated United Water Conservation District (UWCD) Coastal Plain Model.

Recommendation 5: Recharacterize Groundwater Underflows Between Oxnard Subbasin and WLPMA

The evaluation document should recharacterize groundwater underflows from the Oxnard subbasin to WLPMA, and reductions in underflow from WLPMA to Oxnard, which are currently labeled as “losses” of recharge to the Oxnard subbasin. This framing overlooks that many WLPMA extractors within the boundaries of UWCD have understood that the justification for significant extraction fees was for purported groundwater replenishment from the UWCD spreading grounds. Given this understanding of the interconnection between the basins, if the claimed underflows are occurring as stated, they should not simply be viewed as a loss for the Oxnard subbasin. As noted above, greater transparency of the modeling and better data would clarify this problem.

The Draft GSP Evaluation should amend its language to remove the characterization of these underflows as “losses” and instead acknowledge them as part of a balanced, cross-basin groundwater system. Additionally, it would be appropriate for the FCGMA to outline a process to periodically review and update minimum thresholds and measurable objectives on both sides of the boundary between the Las Posas Valley and Oxnard Basins. This approach would ensure an

accurate, equitable, and proportional understanding of recharge dynamics, benefiting the sustainability of both basins.

Recommendation 6: Provide Justification for Projected Increase in Simi Valley Inflows

The Draft GSP Evaluation's future baseline scenario projects nearly 2,000 acre-feet per year (AFY) more in Simi Valley inflows than recent flow levels. The PAC recommends that the Draft GSP Evaluation provide a detailed explanation for this anticipated increase, clarify, and provide supporting data and assumptions that justify this projection. Clear documentation of these projections will enhance stakeholder understanding of the expected inflows and their impact on the overall water management strategy.

III. MANAGEMENT AND PROJECT OVERSIGHT

Recommendation 7: Articulate a Clear Master Plan and Leadership for Advancing GSP Management Projects

The Draft GSP Evaluation outlines various management projects, however, there appears to be no overarching master plan to manage accountability and progress in advancing these projects, nor a designated leader responsible for their progression. Given that the 15-year timeline is relatively short for implementing some of the projects being considered, the PAC recommends that the Draft GSP Evaluation specify how the FCGMA intends to oversee and drive these initiatives. For instance, FCGMA could assign staff to engage periodically (e.g., quarterly) with each project proponent, tracking progress and providing regular updates to FCGMA and stakeholders on any advances or delays. Stakeholders have expressed a strong desire to be informed promptly if a project faces delays or challenges where stakeholder involvement could help mitigate issues, ensuring that the projects are effectively managed within the available timeframe.

Recommendation 8: Clarify the Impact of the Proposed Moorpark Desalter on Groundwater Supply, Recharge, and Water Balance

The PAC recommends that the Draft GSP Evaluation provide a comprehensive discussion of the anticipated effects of the proposed Moorpark desalter on groundwater supply, recharge, and the overall water balance in the ELPMA. Specifically:

- **Groundwater Supply and Recharge Interaction:** The Draft GSP Evaluation should explain how the desalter would influence groundwater extractions and recharge dynamics. If the desalter increases extractions without offsetting them through in-lieu deliveries, it could lead to lower water levels that may undermine sustainability efforts. However, these effects could be mitigated if the desalter's operations encourage dewatering in high groundwater areas near the arroyo, thereby inducing greater recharge, or if the product water is used to reduce extractions in other targeted Basin areas. The Draft GSP Evaluation should address

these factors generally and outline specific actions in the Basin Optimization Plan.

- **Net Impact on Water Balance:** The Draft GSP Evaluation presents conflicting statements about the desalter's effects, suggesting reductions in both groundwater pumping and reliance on imported water. This leaves ambiguity about the net effect on ELPMA's water balance. The Draft GSP Evaluation should clarify the desalter's anticipated impacts on groundwater pumping and imported water usage, with additional analysis in the Basin Optimization Plan to ensure alignment with long-term water balance and sustainability goals.

IV. STAKEHOLDER RESPONSIBILITIES AND TRANSPARENCY

Recommendation 9: Clarify Responsibility for Sustaining Groundwater Dependent Ecosystems (GDEs) along Arroyo Simi/Las Posas

The PAC recommends that the Draft GSP Evaluation clearly specify that groundwater users will not be held responsible for sustaining vegetation along Arroyo Simi/Las Posas, which is currently supported by inflows from Simi Valley wastewater discharge and dewatering wells. The Draft GSP Evaluation should explicitly state that any impact on vegetation due to reductions in these discharges should not be considered an undesirable result under SGMA in the GSP. Additionally, the PAC recommends that FCGMA establish long-term monitoring to track any potential changes in vegetation health related to GDEs. This ongoing monitoring will allow for a proactive approach to understanding and managing impacts without placing responsibility on groundwater users, thus preventing unintended obligations regarding GDE sustainability.

Recommendation 10: Refine and Clarify the Impact Analysis on Northern ELPMA Wells

The PAC recommends that the Draft GSP Evaluation provide greater clarity and consideration in the impact analysis for wells in the northern ELPMA, specifically regarding assumptions about well performance and the effects of minimum thresholds on all well owners.

- **Well Performance Assumptions:** The current analysis assumes wells will not experience significant effects until static groundwater levels reach the top of well screens and that partially desaturated screens can still support pumping. While this may be defensible, sustaining pumping at lower rates depends on appropriate pump placement below the adjusted water levels. The Draft GSP Evaluation should discuss the implications of these assumptions, including the key policy question of what constitutes "significant and unreasonable" impacts for this area, as these criteria influence FCGMA and Dudek's approach to the analysis.

- **Consideration of ASR Wells:** The analysis should also account for the effects on Aquifer Storage and Recovery (ASR) operations, as 10 out of the 22 wells in the evaluation area are Calleguas ASR wells (not solely agricultural wells, as Table 2-1 indicates). The Draft GSP Evaluation should provide an accurate representation of well types and address the

potential impact of minimum thresholds on ASR storage and recovery operations.

- **Impact of Minimum Thresholds on All Well Owners:** Finally, the PAC recommends that the Draft GSP Evaluation discuss how established minimum thresholds will impact all well owners in the area, ensuring a comprehensive understanding of threshold implications across different types of groundwater users.

Recommendation 11: Enhance Transparency and Accessibility in Sections and Tables 7.1 – 7.3

The PAC recommends that the following updates be made to improve transparency and ease of access for stakeholders regarding surcharge rates, fee adoption, compliance, and amendment terminology:

- **Table 7-1:** Update the table to provide details on how the Watermaster establishes extraction surcharge rates. At a minimum, add explanatory footnotes or references to relevant FCGMA Resolutions that outline the basis for these rates.

- **Section 7.1.3 – Funding:** Include footnotes, citations, or references that allow readers to locate documents where the FCGMA adopted specific fees, improving accessibility and clarity.

- **Section 7.2 – Enforcement and Legal Actions:** Provide references or links to each of the listed groundwater extractor responsibilities. This addition would support stakeholder compliance with FCGMA and Watermaster requirements by offering clear guidance on necessary steps.

- **Section 7.3 – Plan Amendments:** Clarify the distinctions between a "GSP amendment," "this Update," and "periodic GSP evaluation," and specify whether the "amendment" planned for Quarter 1 of 2025 aligns with the GSP "evaluation" for submission to DWR.

These additions will improve stakeholder understanding of key processes, requirements, and terminology used within the document.

CONCLUSION

We respectfully submit the above policy-related recommendations for consideration by the FCGMA and Dudek. These recommendations reflect the PAC's commitment to ensuring that the Draft GSP Evaluation is clear, precise, and thoroughly aligned with the objectives set forth in SGMA and the Judgment. We believe these actions will contribute meaningfully to the sustainable management of groundwater in the Las Posas Valley Basin. As stakeholders with a vested interest in the Basin's long-term health, we look forward to continued collaboration with the FCGMA and Dudek to address these critical areas and to support a balanced, forward-thinking approach in the GSP Evaluation.

LAS POSAS VALLEY WATERMASTER RESPONSE REPORT

Date: December 03, 2024

To: Las Posas Valley Watermaster Board of Directors

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

Re: Response Report to PAC Consultation Recommendation Report, Draft First Periodic Evaluation, Groundwater Sustainability Plan for the Las Posas Valley Basin

The Las Posas Valley Watermaster (Watermaster) requested consultation from the Las Posas Valley Policy Advisory Committee (PAC) on the Draft First Periodic Evaluation, Groundwater Sustainability Plan (GSP) for the Las Posas Valley Basin dated August 2024. Watermaster's request was in an August 26, 2024, memorandum to the PAC. The PAC formed an ad hoc subcommittee to review and develop recommendations on the Draft GSP Evaluation. The full PAC discussed the Draft GSP Evaluation at the September 5, 2024, September 19, 2024, October 17, 2024, and November 7, 2024, meetings.

PAC's November 8, 2024, recommendation report included nine recommendations. PAC's recommendations are listed below, followed by Watermaster staff's responses. The Watermaster appreciates PAC's review and recommendations, and PAC's finding that "overall, the document is well-done."

Recommendation 1: Clearly Distinguish Between Model Predictions and Observed Data Throughout the Draft GSP Evaluation

Explicitly label both simulated (modeled) water levels and actual water level measurements in all figures, tables, and discussions. This distinction is crucial for evaluating the model's calibration and its reliability in predicting future groundwater conditions. Accurate calibration, informed by observed data, enhances the model's predictive accuracy.

Response to Recommendation 1:

Labeling has been clarified for the simulated and observed water level measurements in the Draft GSP Evaluation text, tables, and figures.

Recommendation 2: Provide Documentation and Confidence Information for the UWCD Model Used in GSP Evaluation

The documentation for the UWCD model used in the Draft GSP Evaluation has not been made available, leading to reservations within the PAC regarding reliance on a model that has not undergone review by the Las Posas Valley Technical Advisory Committee (TAC). While models aim to replicate real-world conditions, they are inherently imperfect, and confidence in their findings is especially challenging given the limited number of wells (especially in the WLPMA) available for calibration. This limited data set raises concerns about the appropriate confidence interval for the model results. The PAC recommends that the Draft GSP Evaluation include comprehensive information from the UWCD model, including documentation and details on confidence intervals, to address these concerns and improve transparency.

Response to Recommendation 2:
UWCD provided extensive model documentation for the version of the model used for the GSP. UWCD is currently working on the supplemental documentation to cover the changes in the model made since the version used for the GSP. As of the time this response report was prepared, UWCD had not yet finalized this supplemental documentation.

Recommendation 3: Address Deficiency in Monitoring Data Collection
A considerable portion of the monitoring data required by the GSP was not collected during the review period. This data is critical for evaluating the sustainability of the WLPMA and East Las Posas Management Area (ELPMA) and for ensuring compliance with the Judgment. The PAC recommends that the Draft GSP Evaluation clearly outline how the FCGMA plans to address this deficiency, detailing steps to promptly acquire the necessary monitoring data to support future updates and model runs.

Response to Recommendation 3:
The Watermaster agrees that the monitoring in LPVB can be improved. The Watermaster relies on partner agencies for these monitoring data. The Watermaster will work with these partner agencies to formalize agreements to assure that appropriate monitoring data is collected. If agreements cannot be reached to assure appropriate data collection at one or more key wells, Watermaster will evaluate monitoring these wells with Watermaster staff. To address data gaps due to the absence of monitoring facilities identified in the GSP and Draft GSP Evaluation, the Watermaster plans to develop estimated costs and a spending plan, with committee consultation, to include in Watermaster's annual budget for funding through basin assessments. Additionally, Watermaster staff continues to explore opportunities for grant funding that can be used to install dedicated monitoring wells and fill data gaps and plans to request Technical Support Services from DWR as suggested by the TAC, if alternative funding sources cannot be secured.

Recommendation 4: Clarify the Impact of West Las Posas Management Area (WLPMA) Pumping on Oxnard Subbasin Seawater Intrusion
The Draft GSP Evaluation should address the quantifiable relationship between WLPMA pumping and its incremental effect on seawater intrusion in the Oxnard Subbasin. This can be achieved by either including a detailed discussion of this relationship under various management scenarios or by outlining a process and timeline to conduct a focused assessment. Additionally, the PAC recommends that this topic be robustly addressed in the Basin Optimization Yield Study, utilizing the updated United Water Conservation District (UWCD) Coastal Plain Model.

Response to Recommendation 4:
Analysis of the quantifiable relationship between groundwater extraction in the WLPMA and incremental effect on seawater intrusion in the Oxnard Subbasin is beyond the scope of the Draft GSP Evaluation. Rather, the Draft GSP Evaluation follows SGMA and the GSP by acknowledging the interconnectedness of the Oxnard Subbasin and the WLPMA. The Watermaster agrees this is a good recommendation for modeling scenarios that could be conducted in the future.

Recommendation 5: Recharacterize Groundwater Underflows Between Oxnard Subbasin and WLPMA
The evaluation document should recharacterize groundwater underflows from the Oxnard subbasin to WLPMA, and reductions in underflow from WLPMA to Oxnard, which are currently labeled as

"losses" of recharge to the Oxnard subbasin. This framing overlooks that many WLPMA extractors within the boundaries of UWCD have understood that the justification for significant extraction fees was for purported groundwater replenishment from the UWCD spreading grounds. Given this understanding of the interconnection between the basins, if the claimed underflows are occurring as stated, they should not simply be viewed as a loss for the Oxnard subbasin. As noted above, greater transparency of the modeling and better data would clarify this problem.

The Draft GSP Evaluation should amend its language to remove the characterization of these underflows as "losses" and instead acknowledge them as part of a balanced, cross-basin groundwater system. Additionally, it would be appropriate for the FCGMA to outline a process to periodically review and update minimum thresholds and measurable objectives on both sides of the boundary between the Las Posas Valley and Oxnard Basins. This approach would ensure an accurate, equitable, and proportional understanding of recharge dynamics, benefiting the sustainability of both basins.

Response to Recommendation 5:
The term "loss" has been replaced in this section by the term "difference" to remove an unintended value judgement in the draft GSP Evaluation.

The periodic review process for evaluating and updating the minimum thresholds and measurable objectives is set forth in SGMA. FCGMA agrees that the thresholds and objectives on both sides of the boundary between the WLPMA and the Oxnard Subbasin should be reviewed and, if necessary, updated concurrently to ensure that the interbasin flows are adequately accounted for in basin management decisions.

Recommendation 6: Provide Justification for Projected Increase in Simi Valley Inflows
The Draft GSP Evaluation's future baseline scenario projects nearly 2,000 acre-feet per year (AFY) more in Simi Valley inflows than recent flow levels. The PAC recommends that the Draft GSP Evaluation provide a detailed explanation for this anticipated increase, clarify, and provide supporting data and assumptions that justify this projection. Clear documentation of these projections will enhance stakeholder understanding of the expected inflows and their impact on the overall water management strategy.

Response to Recommendation 6:
The future baseline scenario in the GSP Evaluation revised the flows in Arroyo Simi-Las Posas based on a change in the projected water discharge from the Simi Valley Water Quality Control Plant (SVWQCP) presented in the 2020 Urban Water Management Plan. This change removed an assumption in the GSP that these flows would be reduced over time.

The Watermaster agrees that discharges from the SVWQCP have declined over the past decade in response to increasing water conservation efforts within the City of Simi Valley. Over the 2016 to 2022 period, SVCWQP discharges averaged approximately 8,040 AFY, which is approximately 1,890 AFY less than the assumptions used in the Future Baseline and No New Projects 1 (NNP1) scenarios. To evaluate the effects of reduced SVWQCP discharges on groundwater conditions within the ELPMA, the No New Projects 2 (NNP2) model scenario simulated a SVWQCP discharge rate of 8,040 AFY (Section 5.2.2.2.2). The sustainable yield of the NNP1 and NNP2 scenarios was similar. Comparison of the two scenarios indicated that under the simulated pumping distribution, SVWQCP discharges

in excess of approximately 8,040 AFY do not significantly increase the volume of recharge to the ELPMA. Instead, they contribute to increased outflows to the PVB (Section 5.2.2.2.2).

Recommendation 7: Articulate a Clear Master Plan and Leadership for Advancing GSP Management Projects

The Draft GSP Evaluation outlines various management projects, however, there appears to be no overarching master plan to manage accountability and progress in advancing these projects, nor a designated leader responsible for their progression. Given that the 15-year timeline is relatively short for implementing some of the projects being considered, the PAC recommends that the Draft GSP Evaluation specify how the FCGMA intends to oversee and drive these initiatives. For instance, FCGMA could assign staff to engage periodically (e.g., quarterly) with each project proponent, tracking progress and providing regular updates to FCGMA and stakeholders on any advances or delays. Stakeholders have expressed a strong desire to be informed promptly if a project faces delays or challenges where stakeholder involvement could help mitigate issues, ensuring that the projects are effectively managed within the available timeframe.

Response to Recommendation 7:

Watermaster agrees that a long-term master plan is appropriate. The evaluation of projects in the Basin Optimization Plan currently under way will help to inform a master plan guided by Board direction. In addition, Watermaster has appointed staff to engage periodically with project proponents to enable timely project updates with stakeholders.

Recommendation 8: Clarify the Impact of the Proposed Moorpark Desalter on Groundwater Supply, Recharge, and Water Balance

The PAC recommends that the Draft GSP Evaluation provide a comprehensive discussion of the anticipated effects of the proposed Moorpark desalter on groundwater supply, recharge, and the overall water balance in the ELPMA. Specifically:

- **Groundwater Supply and Recharge Interaction:** The Draft GSP Evaluation should explain how the desalter would influence groundwater extractions and recharge dynamics. If the desalter increases extractions without offsetting them through in-lieu deliveries, it could lead to lower water levels that may undermine sustainability efforts. However, these effects could be mitigated if the desalter's operations encourage dewatering in high groundwater areas near the arroyo, thereby inducing greater recharge, or if the product water is used to reduce extractions in other targeted Basin areas. The Draft GSP Evaluation should address these factors generally and outline specific actions in the Basin Optimization Plan.

- **Net Impact on Water Balance:** The Draft GSP Evaluation presents conflicting statements about the desalter's effects, suggesting reductions in both groundwater pumping and reliance on imported water. This leaves ambiguity about the net effect on ELPMA's water balance. The Draft GSP Evaluation should clarify the desalter's anticipated impacts on groundwater pumping and imported water usage, with additional analysis in the Basin Optimization Plan to ensure alignment with long-term water balance and sustainability goals.

Response to Recommendation 8:

The information provided by the project proponent was used in the Draft GSP Evaluation. This information is limited. The Basin Optimization Plan will recommend that a full feasibility study be

conducted for this project. Based on current information, Watermaster cannot assess the potential impacts of the proposed desalter until project is clearly defined, hence the need for a feasibility study.

The Draft GSP Evaluation incorrectly stated that the project would reduce groundwater demands and prevent groundwater elevation declines. That language has been deleted from the draft.

Recommendation 9: Clarify Responsibility for Sustaining Groundwater Dependent Ecosystems (GDEs) along Arroyo Simi/Las Posas
The PAC recommends that the Draft GSP Evaluation clearly specify that groundwater users will not be held responsible for sustaining vegetation along Arroyo Simi/Las Posas, which is currently supported by inflows from Simi Valley wastewater discharge and dewatering wells. The Draft GSP Evaluation should explicitly state that any impact on vegetation due to reductions in these discharges should not be considered an undesirable result under SGMA in the GSP. Additionally, the PAC recommends that FCGMA establish long-term monitoring to track any potential changes in vegetation health related to GDEs. This ongoing monitoring will allow for a proactive approach to understanding and managing impacts without placing responsibility on groundwater users, thus preventing unintended obligations regarding GDE sustainability.

Response to Recommendation 9:
Section 3.3.6 of the GSP notes that "changes in groundwater elevation in the Shallow Alluvial Aquifer related to decreased surface water flows cannot be mitigated by management actions related to groundwater pumping." Further the GSP notes "the measurable objectives selected to maintain groundwater elevations adjacent to Arroyo Las Posas at levels that promote the health of the vegetation in the Arroyo Simi-Las Posas potential GDE are established 'for the purpose of improving overall conditions' in the ELPMA, 'but failure to achieve those objectives shall not be grounds for finding of inadequacy of the Plan' (23 CCR 354.30[g]). FCGMA proposes this aspirational goal with recognition of the dependence on continuation of these external water sources." Text has been added to call out this GSP finding. Watermaster notes that DWR has requested that additional monitoring facilities be constructed to fill data gaps regarding the potential GDEs. Watermaster has developed a schedule, which may be updated or modified based on committee consultation and funding availability (section 2.7.1 of the Draft GDE Evaluation).

Recommendation 10: Refine and Clarify the Impact Analysis on Northern ELPMA Wells
The PAC recommends that the Draft GSP Evaluation provide greater clarity and consideration in the impact analysis for wells in the northern ELPMA, specifically regarding assumptions about well performance and the effects of minimum thresholds on all well owners.

- **Well Performance Assumptions:** The current analysis assumes wells will not experience significant effects until static groundwater levels reach the top of well screens and that partially desaturated screens can still support pumping. While this may be defensible, sustaining pumping at lower rates depends on appropriate pump placement below the adjusted water levels. The Draft GSP Evaluation should discuss the implications of these assumptions, including the key policy question of what constitutes “significant and unreasonable” impacts for this area, as these criteria influence FCGMA and Dudek’s approach to the analysis.

- **Consideration of ASR Wells:** The analysis should also account for the effects on Aquifer Storage and Recovery (ASR) operations, as 10 out of the 22 wells in the evaluation area are Calleguas ASR wells (not solely agricultural wells, as Table 2-1 indicates). The Draft GSP Evaluation should provide an accurate representation of well types and address the potential impact of minimum thresholds on ASR storage and recovery operations.

Response to Recommendation 10:
The FCGMA Board determined in the GSP that a loss of 20% or more of storage beyond the 2015 level in critical areas of the ELPMA constitutes a significant and unreasonable impact to the area. The analysis in the Draft GSP Evaluation evaluates well screens and projected water levels, but not significant effects due to production. The column label in Table 2-1 has been revised to "Projected Water Level Below 50% of the Well Screen." The previous label incorrectly used the word "production."

Recommendation 11: Enhance Transparency and Accessibility in Sections and Tables 7.1 – 7.3
The PAC recommends that the following updates be made to improve transparency and ease of access for stakeholders regarding surcharge rates, fee adoption, compliance, and amendment terminology:

- **Table 7-1:** Update the table to provide details on how the Watermaster establishes extraction surcharge rates. At a minimum, add explanatory footnotes or references to relevant FCGMA Resolutions that outline the basis for these rates.
- **Section 7.1.3 – Funding:** Include footnotes, citations, or references that allow readers to locate documents where the FCGMA adopted specific fees, improving accessibility and clarity.
- **Section 7.2 – Enforcement and Legal Actions:** Provide references or links to each of the listed groundwater extractor responsibilities. This addition would support stakeholder compliance with FCGMA and Watermaster requirements by offering clear guidance on necessary steps.
- **Section 7.3 – Plan Amendments:** Clarify the distinctions between a “GSP amendment,” “this Update,” and “periodic GSP evaluation,” and specify whether the “amendment” planned for Quarter 1 of 2025 aligns with the GSP “evaluation” for submission to DWR.

Response to Recommendation 10:
- **Table 7-1:** Table 7-1 specifically identifies the resolution or ordinance implementing each identified regulatory action. All resolutions and ordinances are available for review and download at the Agency's website www.fcgma.org. A footnote has been added to the table.
- **Section 7.1.3 – Funding:** Footnotes have been added identifying the specific resolutions implementing the funding actions to text in section 7.1.3.
- **Section 7.2 – Enforcement and Legal Actions:** A footnote has been added to section 7.2 identifying availability of resolutions and ordinances at www.fcgma.org.

- **Section 7.3 – Plan Amendments:** The final draft GSP Evaluation no longer envisions a GSP amendment.

LAS POSAS VALLEY WATERMASTER RESPONSE REPORT

Date: December 02, 2024

To: Las Posas Valley Watermaster Board of Directors

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

Re: Response Report to TAC Consultation Recommendation Report, Draft First Periodic Evaluation, Groundwater Sustainability Plan for the Las Posas Valley Basin

The Las Posas Valley Watermaster (Watermaster) requested consultation from the Las Posas Valley Technical Advisory Committee (TAC) on the Draft First Periodic Evaluation, Groundwater Sustainability Plan for the Las Posas Valley Basin dated August 2024. Watermaster's request was in an August 26, 2024, memorandum to the TAC. The TAC discussed and developed its recommendation report at the September 17, 2024, October 2, 2024, and October 15, 2024, TAC meetings.

TAC's October 10, 2024, recommendation report included five comments / recommendations and an attachment with 179 comments by each of the TAC members on specific sections of the draft Periodic Evaluation. The five comments / recommendations are listed below, followed by Watermaster staff's responses. Watermaster staff's responses to the 179 specific recommendations are attached.

Comment / Recommendation 1: Inconsistent Groundwater Monitoring
TAC members all noted and commented on the inconsistency of groundwater elevation and water quality monitoring in the LPVB. Specifically, expected and necessary groundwater elevation and water quality measurement events have been routinely missed since adoption of the GSP. It is critical that these basic data be collected frequently and consistently as without them it is not possible to evaluate conditions in the Basin relative to sustainable management criteria with certainty. The TAC recognizes that the Watermaster relies on partner agencies for groundwater monitoring in many cases and cannot control the data collection programs of those agencies. However, the inconsistent data collection that has occurred as a result of this approach thus far presents a problem that is too large for the Watermaster not to address as quickly and effectively as possible. The TAC is concerned that important interpretations and statements regarding groundwater sustainability presented in the Draft GSP Evaluation are based on limited data (in some cases as little as one or two data points). These interpretations include evaluations of basin-wide, aquifer specific, and management area groundwater conditions, comparisons to minimum thresholds for groundwater sustainability, and conclusions regarding the effectiveness of groundwater management in the LPVB. The TAC questions whether the interpretations can be relied upon given that they are based on such limited and inconsistent data.

To address this inconsistent groundwater monitoring problem the TAC recommends the following:

1. Appropriately caveat interpretations, comparisons, and conclusions that rely on limited and inconsistently collected data (see detailed comments in the attached table for references to specific text passages).

2. Either establish agreements with partner agencies to consistently, correctly, and routinely collect the groundwater elevation and water quality data required to adequately assess groundwater conditions and progress towards sustainability or begin performing these monitoring responsibilities using Watermaster staff.
3. Fast track the projects in the GSP and Draft GSP Evaluation that include construction of monitoring wells and instrumentation of those and other monitoring wells with transducers (Projects 7 and 8, respectively). The Draft GSP Evaluation alluded to delays in implementation of these projects occurred because the Watermaster did not receive requested grant funds. The TAC recommends identifying alternative funding sources for this critical component of successful sustainable groundwater management. If alternative funding sources cannot be secured, consider requesting Technical Support Services (TSS) from DWR. The DWR TSS program was designed to provide field activity support, including monitoring well installation, groundwater level monitoring training, and other relevant assistance.
4. Expand the existing monitoring network by including private wells when and where necessary. While private, active, pumping wells are not perfect for groundwater elevation and water quality monitoring, they are a reasonable means of expanding monitoring networks into areas where dedicated monitoring wells don't exist and providing redundancy for existing monitored wells.

Response to Comment / Recommendation 1:
The Watermaster agrees that the monitoring in LPVB can be improved. The Watermaster will work with partner agencies to formalize agreements to monitor critical wells and will continue to pursue funding mechanisms to fill data gaps and install additional dedicated monitoring wells, if possible.

1. The GSP Evaluation text has been revised where appropriate to reflect limited and inconsistent monitoring data. Revisions to specific text passages in response to TAC's detailed comments are documented in the attached table.
2. The Watermaster will work with partner agencies to establish agreements to ensure appropriate data is collected. If agreements cannot be reached to assure appropriate data collection at one or more key wells, Watermaster will evaluate monitoring these wells with Watermaster staff.
3. Watermaster notes TAC's recommendation to fast-track the monitoring-well and instrumentation projects identified in the GSP and Draft GSP Evaluation. The Watermaster plans to develop estimated costs and a spending plan, with committee consultation, to include in Watermaster's annual budget for funding through basin assessments. Watermaster staff continues to explore opportunities for grant funding that can be used to install dedicated monitoring wells and fill data gaps and plans to request Technical Support Services from DWR if alternative funding sources cannot be secured.
4. The overall monitoring network includes all wells that are screened in individual aquifers, in conformance with SGMA. This includes private production wells. As discussed in response to recommendation 2, Watermaster will take steps to improve routine groundwater monitoring.

Comment / Recommendation 2: Boundary Condition Differences in West and East Management Area Models

The Draft GSP Evaluation indicates that the model used to simulate conditions in the West Las Posas Management Area (WLPMA), the Coastal Plain Model, developed, maintained, and employed by United Water Conservation District (UWCD) was recently modified. The extent and nature of these modifications was not described in detail in the Draft GSP Evaluation, but TAC review did note that a potentially significant change was made to the boundary condition used to represent the Somis Fault, which separates the WLPMA from the East Las Posas Management Area (ELPMA). This component of the Coastal Plain Model that is important to the representation of groundwater flow in the LPVB 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 allowed flow from the WLPMA to the ELPMA.

The Draft GSP Evaluation indicates that the limited groundwater elevation information in this area of the LPVB implies limited groundwater flow across the Somis Fault and that gradients suggest that if flow occurs it is from ELPMA to WLPMA. Unfortunately, further exploration of the effects of the change to the Coastal Plain Model are not included in the document.

The ELPMA model used to simulate conditions in the ELPMA maintains a no-flow boundary along the Somis Fault, which the TAC assumes results in potentially significant differences in simulated groundwater flow across the WLPMA/ELPMA boundary in the two models. However, the differences between the flow conditions and water budgets in the two models is not described in the Draft GSP Evaluation. The TAC is concerned that the difference in the representation of this boundary between the two LPVB management areas signifies a problematic discrepancy in simulated groundwater flow and budgets within the LPVB.

The Draft GSP Evaluation does indicate that the Watermaster plans to coordinate with UWCD and the TAC to better align the representation of this boundary condition in advance of the Basin Optimization Yield Study. However, the Draft GSP Evaluation relies on simulations using these two models to assess the adequacy of the GSP to meet the sustainability goal of the LPVB, including the effect of projects and management actions and estimating historical changes in groundwater storage, effects of reductions in groundwater production, and sustainable yield for each management area.

The TAC also notes that the Draft GSP Evaluation includes references to multiple documents that include additional information regarding the changes to the Coastal Plain Model. However, these references are either not yet available for review or the information included in them is not included in the Draft GSP Evaluation.

The TAC recommends the following regarding this model discrepancy:

1. Add detailed information relating to the changes to the Coastal Plain Model. This should include maps showing the area of changed Somis Fault boundary conditions, volumes of flow between the two management areas, comparison to the version of the model used in the original GSP, etc. This additional detail should be aimed at providing information to alleviate concerns regarding the apparent inconsistency between the two models.

2. Include relevant information on the changes to the Coastal Plain Model in the Draft GSP Evaluation, not simply as references to other documents. Stakeholders and interested parties should not have to read reports for other basins to access information related to important components of the LPVB GSP Evaluation.
3. Assess and document the differences in simulated flow and water budgets across the Somis Fault between the two models and include this information in the GSP Evaluation.
4. 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.

Response to Comment / Recommendation 2:
Watermaster notes TAC's comments on the change in the boundary condition along the Somis Fault in the WLPMA portion of the Coastal Plain Model. UWCD developed and maintains the Coastal Plan Model and made this change, as was identified in the draft GSP Evaluation. UWCD is currently working on the supplemental documentation to cover the changes made since the GSP version of the model. As of the time this response report was prepared, UWCD had not yet finalized this supplemental documentation.

Water budgets are provided for each management area in the draft GSP Evaluation. These budgets are similar to those presented in the GSP, and changes to the Coastal Plain Model do not manifest in large changes to the sustainable yield estimate of the WLPMA. Watermaster will continue to work with the TAC to improve the understanding of the potential impact of management actions and projects in the LPVB.

The current models used for the WLPMA and ELPMA are the best available tools for assessing the impacts of projects and management actions. The TAC rightly points to areas where these models can be improved for future use.

1. Watermaster has forwarded TAC's recommendation to UWCD. 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.
2. Please see response above.
3. Water budgets are provided for each management area. These budgets are similar to those presented in the GSP, and changes to the Coastal Plain Model do not manifest in large changes to the sustainable yield estimate of the WLPMA. Watermaster will continue to work with the TAC to improve the understanding of the potential impact of management actions and projects in the LPVB.
4. Watermaster notes and thanks TAC for its comment.

Comment / Recommendation 3: Relationship Between Oxnard Subbasin and Sustainability in the WLPMA
The TAC is concerned that the methods used to date to assess the effects of pumping in the WLPMA on seawater intrusion conditions in the Oxnard Subbasin lack scientific rigor. 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 recommends developing model scenarios that limit changes to single variables to assess the impacts of those variables on sustainability. This could include scenarios where pumping in the Oxnard Subbasin and Pleasant Valley Subbasin are held constant while pumping in WLPMA is varied. Comparison of the results of such simulations could then be compared to the baseline to evaluate changes in seawater intrusion in the Oxnard Subbasin, thereby developing a relationship between pumping volume in WLPMA and seawater intrusion. Similar scenarios with reductions in pumping in only the Oxnard Subbasin and only the Pleasant Valley Basin could also be conducted to isolate the effects of changes in pumping in those basins on seawater intrusion. Estimates of the effects of pumping reductions in each individual basin could then be used to more precisely identify the sustainable yield in each basin.

Response to Comment / Recommendation 3:
The connection between the WLPMA and the Oxnard Subbasin was established with rigorous scientific evaluation and review through the Technical Advisory Group prior to SGMA. The evaluation does not seek to quantify the impact of pumping in one basin on another. Rather, it follows SGMA and the GSP by acknowledging the interconnectedness of the Oxnard Subbasin and the WLPMA. The WLPMA sustainability yield was estimated with appropriate scientific rigor through numerical flow modeling.

Watermaster agrees that TAC provides good recommendations for modeling scenarios that could be conducted in the future.

Comment / Recommendation 4: Respond Completely to all Elements of the DWR Recommended Corrective Actions

The DWR recommended corrective actions (RCAs) all include multiple requests for additional information, and the responses did not always provide all the requested information. For instance, the RCA 2 requests discussion of the potential effects of the minimum thresholds and measurable objectives on beneficial uses and users of groundwater. However, the sections of the Draft GSP Evaluation intended to respond to this RCA may not adequately respond to this request. The discussion that is included is somewhat vague about the beneficial uses and users and includes errors, as detailed in the specific comments in the attached table. This is true for other RCA responses as well, as documented in the attached table.

The TAC recommends carefully reviewing the entirety of each RCA and identifying each component of DWR's request and including responses. The TAC believes that it is better to acknowledge each element of the RCA, even if there is insufficient information to completely address the request. In such cases it would be appropriate to indicate how the Watermaster plans to address the RCA in the future.

Response to Comment / Recommendation 4:
Watermaster agrees with TAC's comment / recommendation. The GSP Evaluation text has been clarified and revised, where appropriate, to further explain the responses to DWR's recommended corrective actions. The revised text is responsive to DWR's recommended corrective actions.

Comment / Recommendation 5: Check Entire Document for Consistency of Language and Content
The TAC noted variability in the Draft GSP Evaluation relating to use of language when presenting important conclusions and between tables and text. The TAC review specifically noted sections of text that presented the same information but used different language that was sometimes less certain and/or impactful. Instances of passive and uncertain terminology in important conclusions were also observed.

The TAC recommends the authors review the detailed comments in the attached table and perform a thorough review of the document to maintain consistent content and impact throughout.

Response to Comment / Recommendation 5:
The draft GSP Evaluation text was reviewed and revised where appropriate in response to TAC's comment / recommendation. The text and tables of the GSP evaluation have been revised, where appropriate, in response to TAC comments provided in the table attached to the recommendation report. The detailed responses to the comments are listed in the attached table.

Item 20D - Watermaster Response - TAC

Specific Comments from the Las Posas Valley Basin Technical Advisory Committee
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Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment	Watermaster Response
BB-TC-1	Bryan Bondy	General Technical	Interpretations Made Based on Limited Data	--	--	--	Interpretations presented in the document that are based on limited data (in some cases as little as one or two data points), should be appropriately caveated and, as discussed in other comments, steps should be taken to better coordinate with monitoring partners to reduce the frequency of missing data.	Noted. The text and tables of the GSP evaluation have been revised, where appropriate, in response to TAC comments provided in the table attached to the recommendation report. The detailed responses to the comments in the table are listed below.
BB-TC-2	Bryan Bondy	General Technical	Missing Monitoring Data	--	--	--	There are a notable number of unavailable groundwater level and quality measurements during period since GSP adoption. It is critical that data be collected to evaluate status relative to the sustainable management criteria and more generally understand groundwater conditions. It is noted that FCGMA does not collect data itself and, instead, relies on other entities monitoring programs for data. To date, it does not appear that FCGMA has formalized arrangements with the monitoring entities. It is recommended that FCGMA coordinate with the monitoring entities communicate FCGMA's data needs and formalize agreements. In cases where the monitoring entities cannot commit to providing certain data or if monitoring locations are no longer available or accessible, FCGMA should take steps to address those gaps.	The Watermaster agrees that the monitoring in LPVB can be improved. The Watermaster will work with partner agencies to formalize an agreement to monitor critical wells and will continue to pursue funding mechanisms to install additional dedicated monitoring wells and fill data gaps, if possible.
BB-TC-3a	Bryan Bondy	Technical	--	ES-2	3rd paragraph	*In the western part of the WLPMA groundwater elevations in the FCA were higher in water year 2024 than they were in water year 2015.*	Based on Figure 2-4, there does not appear to be any 2024 groundwater level measurements in the western half of the WLPMA. Therefore, it is unclear what data the quoted sentence is based upon.	Figure 2-4 only shows the water level changes in the key wells relative to groundwater elevations in 2015, the minimum thresholds, and measurable objectives. Groundwater elevations are measured in wells throughout the monitoring network. The quoted sentence is based on figures 2-7 and 2-8
BB-TC-3b	Bryan Bondy	Technical	--	ES-2	3rd paragraph	*In contrast, groundwater elevations in the eastern part of the WLPMA were lower in water year 2024 than they were in water year 2015.*	Based on Figure 2-4, there is one well indicating a higher groundwater level in 2024 and one indicating a lower groundwater level in the eastern half of the WLPMA. Therefore, it is unclear what data this statement is based upon.	See above response.
BB-TC-3c	Bryan Bondy	Technical	--	ES-2	3rd paragraph		Consider instead distinguishing between changes in the pumping depression in the southeastern corner of the WLPMA versus the remainder of the management area, with groundwater levels appearing to be lower in former and higher in the latter.	Text has been revised.
BB-TC-4	Bryan Bondy	Technical	Representative Monitoring Points		Figure 2-2 Table 2-2	--	Consideration should be given to enhancing the RMP network (per review of Figure 2-2): • Western WLPMA – there is no RMP for the Fox Canyon Aquifer • WLPMA and ELPMA – both areas lack GCA RMPs (potential candidate RPM well is 03N19W30E07-D) • Epworth Gravels – only one RPM (potential candidate for additional RMPs include 03N19W30M02 and 03N19W30E07-S)	Noted. These areas are identified in the GSP. FCGMA will investigate the inclusion of the recommended wells as RMPs.
BB-TC-5	Bryan Bondy	Technical	Zone Mutual Water Company Infrastructure Improvement Project		Table 1-1, 4th row; Section 3.2.1; Section 5.2.2.1.5	--	While Zone Mutual Water Company (Zone) is moving forward with the infrastructure improvements described in the evaluation report, Zone has indicated there are potential legal issues that may prohibit or limit Zone's ability to wheel water to non-shareholders. These issues need to be studied along with other opportunities for moving water between WLPMA and ELPMA. Regarding the 500 AFY of water savings associated with converting from scheduled deliveries to on-demand deliveries, this benefit should not be included in the future water supplies for the Projects Scenario because that water savings will be retained as carryover or leased to other water right holders for the benefit of Zone shareholders unless Watermaster creates a financial mechanism to make Zone whole.	Noted. The project description was solicited as part of the FCGMA Board project prioritization process that commenced prior to formation of the TAC. The project description provided by the project proponent was used to incorporate the project into the model for the GSP evaluation. Revisions to the project description are planned for the Basin Optimization Plan.
BB-TC-6	Bryan Bondy	Technical	Analysis of Effects of MTs on Beneficial Users in ELPMA	7-8	Section 2.2.1.2; Table 2-1	*The depth and groundwater production rates from the wells in this area indicate that they are agricultural wells…*	This statement is incorrect. 10 of the 22 wells are Calleguas ASR wells.	Text has been revised
BB-TC-7	Bryan Bondy	Technical	Analysis of Effects of MTs on Beneficial Users in ELPMA	7-8	Section 2.2.1.2; Table 2-1	--	The reviewer checked the top perforation elevation of 13 of the 22 wells in Table 2-1 for which data was readily available and found 12/13 to be incorrect, with errors averaging 48 feet ranging from 10 to 364 feet. Using the correct elevations for the twelve wells reviewed would add three wells to the number of wells with a projected groundwater elevation below the top of the screen. Based on these findings, a full QC of this table is warranted.	Table values were revised.
BB-TC-8	Bryan Bondy	Technical	Analysis of Effects of MTs on Beneficial Users in ELPMA	7-8	Section 2.2.1.2; Table 2-1	--	The analysis implies that significant effects will not manifest until the static groundwater level drops below the top of the screen in a well. The analysis also implicitly assumes that pumping can be sustained with pump placements in the screen interval. These assumptions are inconsistent with the generally accepted well design principle of pump placement above the top of screen to avoid pump bowl or screen abrasion, sand production, cascading water, and accelerated fouling (Glotfelty, 2019 - Art of Water Wells). Wells with partially desaturated screens commonly experience increased fouling rates (sometimes very rapid), which causes significant loss of production, premature well rehabilitation, and premature well replacement. Text should be added to explain why these effects are not considered in the analysis.	The FCGMA board determined in the GSP that a loss of 20% or more of storage beyond the 2015 level in critical areas of the ELPMA constitutes a significant and unreasonable impact to the area. The analysis in the draft GSP Evaluation evaluates well screens and projected water levels, but not significant effects to production. The column label in Table 2-1 has been revised to "Projected Water Level Below 50% of the Well Screen." The previous label incorrectly used the word "production."
BB-TC-9	Bryan Bondy	Technical	Analysis of Effects of MTs on Beneficial Users in ELPMA	7-8	Section 2.2.1.2; Table 2-1	--	Given that 10 of the 22 wells identified in Table 2-1 are Calleguas ASR wells, the analysis should address potential effects on storage and recovery operations of the Calleguas ASR well fields.	The Watermaster is a member of the Calleguas ASR Study Group that will develop a Calleguas ASR Project Operations Plan. Future evaluations will include information from this effort.
BB-TC-10	Bryan Bondy	Technical	GDEs	34	Section 2.7.2	*The areas where satellite imagery indicates declining plant cover may be related to shifting flow patterns within the arroyo, with decreasing greenness on the banks of the arroyo and decreasing greenness in the downstream portion of the arroyo, adjacent to the PVB.*	Another potential explanation for decrease greenness could be vegetation removal during high flow events during the 2023 and 2023 wet seasons. Air photos could be reviewed to assess this.	Text has been added to note this.

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Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment	Watermaster Response
BB-TC-11	Bryan Bondy	Technical	Arroyo Simi-Las Posas Water Acquisition Project	40	Section 3.1.2.3.2 and Table 3-1	*Text states the project "will make additional water available to recharge" and table states the project benefit will be "increase in sustainable yield."*	These statements are incorrect. The project would ensure that existing inflows continue, which maintains status quo, as opposed to adding water to the ELPMA water balance.	Revised.
BB-TC-12	Bryan Bondy	Technical	--	43	Section 3.2.2	*Text states the project would "reduce the dependence on imported water in the LPVB by providing new local potable supplies" and later states the project will "reduce groundwater demands in the LPVB."*	These statements appear to be in conflict. Please provide information about anticipated reductions in groundwater demand vs. reduction in imported water purchases. In other words, what is the anticipated net benefit to the ELPMA water balance?	Text has been revised to remove the reference to reducing groundwater demands.
BB-TC-13	Bryan Bondy	Technical	New Data for ELPMA	51	Section 4.1.1.1	*No new information is available that would improve or update the understanding of the hydrogeologic conceptual model of the ELPMA and Epworth Gravels Management Area.*	Calleguas has constructed three multi-level groundwater monitoring wells, which provides new stratigraphic data for the hydrostratigraphic model. In particular, 03N19W30E07 is a nested monitoring well that provides data to better characterize the Epworth, FCA, and GCA in northern ELPMA and 02N20W11B01-3 is a clustered monitoring well that provides data better characterize the Upper San Pedro Formation and FCA south of the Moorpark Anticline in the ELPMA. In addition, groundwater level data collected from these wells can be used to characterize vertical gradients. These data should be incorporated into the Hydrogeologic Conceptual Model.	Text has been added to the hydrogeologic conceptual model section noting the construction of these wells.
BB-TC-14	Bryan Bondy	Technical	Data Gaps in the HCM	52	Section 4.2; Table 4-1	--	Text states that no additional information has been collected to address data gaps. Please see prior comment. New data from Calleguas' multi-level groundwater monitoring wells helps address the data gaps listed in Table 4-1.	Text has been revised.
BB-TC-15	Bryan Bondy	Technical	WLPMA Model Update		Section 5.1.1, Table 2-4b	--	Review of the modeling for the WLPMA cannot not be completed at this time because documentation of the Coastal Plan model is not yet available. Based on review of the GSP evaluation, there are several issues with the Coastal Plain model that appear worthy of further review in consultation with the TAC. Additional items worthy of further review may be identified after documentation review. The issues identified based on the GSP evaluation review include (1) conversion of the WLPMA-ELPMA model boundary from no-flow to general head, (2) inconsistency between the model LAS water balance (Table 2-4b), which indicates little to no underflow from the Oxnard Subbasin into WLPMA in contrast with spring groundwater elevation contours in the annual reports that suggest there is underflow from the Oxnard Subbasin into WLPMA; (3) groundwater exchange between Pleasant Valley Basin and WLPMA; and (4) groundwater exchange between ELPMA and WLPMA.	Noted. Thank you for your comment.
BB-TC-16	Bryan Bondy	Technical	WLPMA Modeling and Sustainable Yield Estimate for WLPMA		Section 5.2.2.1 and Section 5.2.3.1	--	While assessment of impacts on adjacent basins is clearly required under SGMA, the framing and analysis of WLPMA impact on Oxnard Basin and the approach to estimating WLPMA sustainable yield seem problematic for multiple reasons. First the analysis has not isolated the impact of WLPMA pumping on seawater intrusion for technical evaluation and consideration in policy making. Second, the analysis of the interaction between WLPMA and the Oxnard Subbasin appears to ignore the fact that numerous WLPMA groundwater pumpers pay pump fees to UWCD. This is evident in the discussion of the underflows from Oxnard Subbasin into WLPMA, which are characterized as a "losses of underflow recharge" to the Oxnard Subbasin. The implication is that WLPMA is taking water away from the Oxnard Subbasin, when, in fact, many pumpers have paid for the benefit of underflow from UCWD's recharge operations. Consideration should be given to reframing analysis of WLPMA impacts on seawater intrusion and WLPMA sustainable yield to account for underflow that is paid for by WLPMA extraction fees paid to UWCD and additional analysis that isolates the actual influence of WLPMA pumping on seawater intrusion.	The term "loss" has been replaced in this section by the term "difference" to remove an unintended value judgement in the draft.
BB-TC-17	Bryan Bondy	Technical	Future Baseline with EBB Results	85	Section 5.2.2.1.6	--	Regarding the Future Baseline with EBB scenario, the text states "These results indicate that groundwater production at the average 2016 to 2022 rates in the Oxnard Subbasin, PVB, and WLPMA may be sustainable if UWCD's EBB project is implemented at a 10,000 AFY production scale." It is unclear how this scenario can be considered sustainable for the WLPMA because Figures 5-23a and b show minimum threshold exceedances for this scenario.	Noted. The text has been revised to include this observation. The minimum threshold may need to be shifted in WLPMA, as well as at the coast, if EBB is implemented.
BB-TC-18	Bryan Bondy	Technical	ELPMA Future Baseline Scenario		Section 5.2.2.2.1	--	Please incorporate the table produced for TAC titled "Summary of Annual Discharges Simulated in the East Las Posas Model (2040-2069 Average" into the evaluation report in this section as it provides important context for technical evaluation of the scenarios.	Table was added.
BB-TC-19	Bryan Bondy	Technical	--	91	Section 5.2.3.2	--	Average ELPMA pumping 2021-2022 value of 23,800 incorrectly includes Epworth Gravels pumping and should be reduced to 23,400 (see Table 4-4). After making that correction, the amount of extraction in excess of the upper estimate of sustainable yield becomes 1,900 AFY and should be updated.	Text has been revised.
BB-TC-20	Bryan Bondy	Technical	--	92	Section 5.2.3.3	--	The 2021-2022 average annual extractions from the Epworth Gravels is incorrectly reported as approximately 900 AFY and being approximately 450 AFY lower than the estimated upper end of the sustainable yield. Per Table 4-4, the 2021-2022 average annual extractions should be approximately 460 AFY, which is approximately 890 AFY lower than the estimated upper end of the sustainable yield.	Text has been revised.
BB-TC-21	Bryan Bondy	Technical	Monitoring Network		Section 6	--	Consideration should be given to incorporating the three multi-level monitoring wells constructed by Calleguas in the ELPMA into the monitoring network. These monitoring well nests/clusters provide valuable aquifer specific data, including much needed data for the Grimes Canyon Aquifer at one location. Data from these wells are already provided to FCGMA by Calleguas MWD on a regular basis.	Text has been revised.

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Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment	Watermaster Response
BB-TC-22	Bryan Bondy	Technical	Revisions to CMWD Monitoring Network	95	Section 6.1; Table 6-2	*Four of the wells have been removed from the monitoring network because they were either destroyed or CMWD had recurring access issues.*	Calleguas has not had access issues. The following are clarifications concerning the wells listed in Table 6-2: • Well 03N20W32H02S has been dry for numerous years. Calleguas continues to check the well for water and will reinstall a transducer if water returns. Consider retaining in monitoring network pending increasing groundwater levels. • Well 02N20W02D02S was destroyed by the owner. • Well 03N20W36P01S has a transducer stuck in the sounding tube. The transducer will be reinstalled the next time the well pump is removed. • Well 03N20W35J01S is continuing to be monitored with a transducer. However, the groundwater levels are considered anomalous. It is recommended that this well be removed from the monitoring network due to anomalous data. • Well 02N20W01B02 is noted as being added to the monitoring network in Table 6-2. This is not correct. This well was already included in the monitoring network in the GSP. Table 6-2 says no water quality sampling. This is not correct. Water quality samples are collected according to satisfy Division of Drinking Water requirements and are available from Calleguas or from the SWRCB website. Calleguas has added its three multilevel groundwater monitoring wells to its monitoring network.	These suggestions have been incorporated into the text
BB-TC-23	Bryan Bondy	Technical	Change in CMWD Monitoring Schedule	96	Table 6-3	--	Table 6-3 indicates that several wells are “no longer monitored” for water quality. It is noted that Calleguas has never sampled these wells (except once for monitoring wells immediately following construction). FCGMA incorrectly assumed that Calleguas was sampling these wells. Well 02N19W06F01S is an agricultural well, not a monitoring well. Well 02N20W09Q08S is a monitoring well, not a municipal well.	Table has been changed and text has been revised.
BB-TC-24	Bryan Bondy	Technical	Water Level Measurements: Temporal Data Gap, p. 98	98	Section 6.2.2.2	*Currently, groundwater elevation measurements are not scheduled according to these criteria because FCGMA relies on monitoring by several other agencies. To minimize the effects of this type of temporal data gap in the future, it would be necessary to coordinate the collection of groundwater elevation data, so it occurs within a 2-week window during the key reporting periods of mid-March and mid-October. The recommended collection windows are October 9–22 in the fall and March 9–22 in the spring.*	Calleguas and VCWWD have transducers installed in all the wells in their monitoring network. The only reason data may be missing for these wells during the fall and spring two-week windows is if a transducer has failed and is pending reinstallation. FCGMA is encouraged to coordinate with Calleguas and VCWWD to facilitate determine an approach for collection of manual groundwater level measurements to address the fall and spring window data needs.	Text has been revised to recognize where transducers are already installed.
BB-TC-25	Bryan Bondy	Technical	Water Level Measurements: Temporal Data Gap, p. 98	98	Section 6.2.2.2	*Additionally, as funding becomes available, pressure transducers should be added to wells in the groundwater monitoring network.*	It is noted that Calleguas and VCWWD already have transducers installed in all the wells in their monitoring network.	Text has been revised to recognize where transducers are already installed.
BB-TC-26	Bryan Bondy	Technical	Water Level Measurements: Temporal Data Gap, p. 98	98	Section 6.2.2.2	*Since adoption of the GSP, 13 wells that were to be monitored for groundwater quality are no longer monitored for groundwater quality. The majority these wells, 11 of the 13 wells, are representative monitoring wells located in the ELPMA.requirements.*	As noted in comment BB-TC-23, Calleguas never committed to sample the wells in its monitoring network, other than ASR wells, which are sampled to comply with Division of Drinking Water requirements.	Table has been changed and text has been revised.
BB-TC-27	Bryan Bondy	Technical	Data Gaps	97	Section 6.2	--	Consideration should be given to reevaluating data gaps in consultation with TAC after FCGMA staff have met and conferred with the monitoring entities.	Noted. This suggestion has been added to the list of coordination activities to be performed in the upcoming years.
BB-TC-28a	Bryan Bondy	General Technical	Potential Additional Report Elements	--	--	--	1.Consideration should be given to including groundwater level contour maps. Perhaps the annual report figures could becompiled into an appendix.	Noted. The focus of this evaluation is on the progress toward implementation. Contour maps are generated annually and included in the annual reports, which are available online at the FCGMA and DWR websites.
BB-TC-28b	Bryan Bondy	General Technical	Potential Additional Report Elements	--	--	--	2.Consideration should be given to including discussion concerning whether there were any notable changes in the spatialdistribution of pumping in the management areas.	Noted. This is a good suggestion for incorporation into the annual reports.
BB-EC-1	Bryan Bondy	General Editorial	Figure References	--	--	--	The reviewer noticed a number of incorrect figure and table number references in the text. Consider QC'ing.	Text, figures, and tables have been QC'd.
BB-EC-2	Bryan Bondy	Editorial	--	120	Figure 2-2	--	Wells 18H12 and 17L01 (WLPMA) and 01Q02 (ELPMA) are depicted as RMP/Key Wells but are not identified as such in the GSP and are not listed in Table 2-2.	Figure has been revised
BB-EC-3	Bryan Bondy	Editorial	--	120	Figure 2-2	--	RMP/Key Well 35R02 is missing on Figure 2-2.	Figure has been revised
BB-EC-4	Bryan Bondy	Editorial	--	ES-3	2nd full paragraph	*...14 key wells in the ELPMA...*	per Table 2-2 and the GSP, there are 15 (13 FCA and 2 Shallow Aquifer).	Revised.

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Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment	Watermaster Response
BB-EC-5	Bryan Bondy	Editorial	--	122 and 124	Figures 2-3 and 2-4	--	These figures are a clever approach to communicating status relative to the SMCs. However, while the graphics in the lower half of the figures are intuitive, they are misleading because the scale for each well is different. This is most evident in the fact that the distance between the MO and MT lines are same for each well when the actual distance between MO and MT ranges from 20 to 100 feet. Additionally, wells appear closer or further from their respective MO / MT relative to other wells than they actually are. For example, the Spring 2024 groundwater levels for 26R03 and 01B02 on Figure 2-4 visually appear to be very different heights above their respective MOs but are actually about the same (24 and 23 feet, respectively). At a minimum, the bottom graphics should be noted as being not to scale and that the graphics for the various wells are not comparable. Preferable, the graphics would be adjusted to that all wells are at the same scale and the actual distances between MO and MT for each well are depicted.	Noted. The intent of these figures is to summarize the status relative to the SMCs. The graphics are scaled to the difference between the MT and MO. This information has been added to the figures. Absolute change in groundwater level relative to the MT and MO is displayed in the hydrographs.
BB-EC-6	Bryan Bondy	Editorial	--	ES-4	1st paragraph	--	The values in this paragraph are incorrect: • Average WLPMA pumping 2021-2022 was 4,000 AFY more than the upper estimate of sustainable yield, not 3,100 AFY (see value reported on p. 90). • Average ELPMA pumping 2021-2022 was 1,900 AFY more than the upper estimate of sustainable yield, not 2,300 AFY (note: although 2,300 is reported on p. 91, the pumping used for the calculation incorrectly includes Epworth Gravels pumping).	WLPMA reference has been updated to 4,000 AFY more than the upper estimate of the sustainable yield. The ELPMA reference was not updated. The 2021-2022 extraction of 23,800 AFY is 2,300 AFY higher than the upper end estimate of the sustainable yield for the ELPMA (21,500 AFY, inclusive of pumping within the Epworth Gravels). Consistent with the GSP, the sustainable yield includes the Epworth Gravels. Page 91 has been updated to note this.
BB-EC-7	Bryan Bondy	Editorial	--	1	Table 1-1, 2nd row	--	Consider also mentioning Simi Valley dewatering wells here, i.e., the City of Simi Valley is no longer planning to divert dewatering well discharges to a desalter for potable use.	Added
BB-EC-8	Bryan Bondy	Editorial	--	6	Section 2.2 second paragraph	--	Per Figure 2-4, groundwater elevations were measured in 16 of the 21 key wells, not 15 as indicated in the text.	Revised.
BB-EC-9	Bryan Bondy	Editorial	--	24	Table 2-5	--	WLPMA – LAS estimated 2016-2024 change in storage value is incorrect. S/B -32,970	Revised.
BB-EC-10	Bryan Bondy	Editorial	--	52	Section 4.1.3.1	--	It is unclear what new information has been incorporated into understanding of recharge areas.	Noted. This is correcting an omission in the GSP.
BB-EC-11	Bryan Bondy	Editorial	--	55	Section 4.3.2.1	--	Text states “Available data characterizing groundwater extractions in water years 2021 and 2022 indicate that groundwater extractions from the LPVB averaged approximately 42,400 AFY (Tables 4-3 and 4-4).” Per the referenced tables, the value cited in the text should be 40,400 AFY.	Revised.
BB-EC-12	Bryan Bondy	Editorial	--	Table 4-4		--	WY 2022 Epworth Gravels Aquifer extraction value appears anomalously low. Consider investigating and/or footnoting.	This is the correct value, although the reported extraction value had to be estimated from the AMI data and may be lower than the actual volume produced.
BB-EC-13	Bryan Bondy	Editorial	--	Table 4-4		--	Please footnote table to clarify whether values include Calleguas MWD extractions.	This table does not include the CMWD extractions. A footnote has been added to the table.
BB-EC-14	Bryan Bondy	Editorial	--	68-69		--	Something is wrong with the transition from p. 68 to p. 69.	Noted. Thank you for your comment.
BB-EC-15	Bryan Bondy	Editorial	--	86	Section 5.2.2.2.1	--	Second bullet – the wrong model is referenced.	Revised.
BB-EC-16	Bryan Bondy	Editorial	--	Table 6-1		--	Explanation for footnote “a” is missing.	Footnote designation was added in error. Table has been revised.
BB-EC-17	Bryan Bondy	Editorial	--	98		--	“CGMA” s/b “FCGMA”	Revised.
BA-1	Bob Abrams	General Technical	Groundwater Monitoring	--	--	--	Overall, monitoring in the LPVB could be improved. Many key wells have not been monitored and no reasons for this are provided. For example, key well 02N20W06R01S, which has been below the water-level minimum threshold, was not monitored in 2024. The lack of monitoring seems particularly true in the West Las Posas Management Area (WLPMA), where there are five key wells but only two or three are ever monitored. The lack of explanation could be interpreted to mean that the Fox Canyon Groundwater Management Agency (FCGMA) is trying to downplay this issue.	The Watermaster relies on other agencies for monitoring data and agrees that the monitoring in LPVB can be improved. All available data collected during the March and October have been included in the evaluation. The Watermaster will work with partner agencies to formalize an agreement to monitor critical wells and will continue to pursue funding mechanisms to install additional dedicated monitoring wells, if possible.
BA-2	Bob Abrams	General Technical	Projects and Management Actions	--	--	--	In terms of projects benefitting the LPVB, the evaluation appears to indicate that action is being delayed because of the Judgment and Basin Optimization Plan. For example, it appears that FCGMA has spent most their time on the Oxnard Basin model, work that was done by United Water Conservation District (UWCD). This seems to be the only substantive management action that has moved forward in LPVB.	The introductory text to the projects and management actions section of the GSP Evaluation provides context for the reader on the additional work that has been done since the GSP was adopted as well as the work that is mandated by the Judgment. FCGMA continued to work on the projects identified in the GSP, and solicited additional projects after the GSP was adopted. FCGMA also provides a detailed list of the actions taken by the agency since the GSP adoption in section 7 of the GSP periodic evaluation. The statement that UWCD's updates to the Coastal Plain model are "the only substantive management action that had moved forward in the LPVB" is a mischaracterization of the extensive work that is documented in the periodic evaluation. Furthermore, the improvements to the Coastal Plain model represent a technical improvement, but are not a management action.

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Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment	Watermaster Response
BA-3	Bob Abrams	General Technical	Grimes Canyon Aquifer	--	--	--	The Grimes Canyon Aquifer (GCA) seems to be mentioned then ignored. In WLPMA, where data are particularly sparse, it just gets lumped into the Lower Aquifer System (LAS).	There are no monitoring wells screened solely in the GCA. This is a data gap that FCGMA has sought to fill by pursuing SGM grant funding for monitoring wells in the LPVB. The Watermaster plans to develop estimated costs and a spending plan, with committee consultation, to include in Watermaster's annual budget for funding through basin assessments. Watermaster staff continues to work to secure funding that can be used to install dedicated monitoring wells and fill data gaps, including in the GCA.
BA-4	Bob Abrams	General Technical	Recharge Figures	--	--	--	Figure 4-1 that shows recharge areas for Fox Canyon Aquifer (FCA). Why no equivalent figure for the GCA recharge area?	The recharge area consists of undifferentiated outcrops of FCA and GCA. The text and figure have been revised accordingly.
BA-5	Bob Abrams	General Technical	Water Quality	--	--	--	There are indications of deteriorating groundwater quality in localized areas. The Evaluations states that this is not related to pumping, but no explanation is given for why for the local concentration increases. Is water from the Upper San Pedro possibly being pulled down by pumping?	Groundwater from the Upper San Pedro is being pulled down by groundwater production in the Fox Canyon aquifer. The Upper San Pedro is a principal source of recharge to the underlying aquifers. There are not enough data to suggest that groundwater quality changes are related to groundwater production, or that the groundwater quality in the Upper San Pedro is worse than the groundwater quality in the underlying FCA (see figures 2-19 through 2-23).
BA-6	Bob Abrams	General Technical	Groundwater Monitoring	--	--	--	FCGMA appears to source most or all of the necessary monitoring data from other agencies. Thus, there is no apparent direct culpability if data are not collected.	FCGMA relies on other agencies with jurisdiction to monitor their respective wells and monitoring points. The agencies coordinate with each other, and FCGMA appreciates the professionals that collect the data from each agency and understands that each agency acts in good faith to access a monitoring point and collect data. As discussed above, The Watermaster will work with partner agencies to formalize an agreement to monitor critical wells
BA-7	Bob Abrams	General Technical	Groundwater Modeling	--	--	--	A large amount of new modeling work for the Oxnard Basin is presented. This work is only slightly relevant to the WLPMA of LPVB, but much attention is devoted to describing this work in the Evaluation. The many particle tracking figures presented do not appear to be relevant to the Evaluation.	The particle tracks are presented to show the modeled influence of each scenario on seawater intrusion. These are relevant to the WLPMA, which is included within the model domain because it is hydrogeologically connected to the adjacent Oxnard Subbasin.
BA-8	Bob Abrams	Editorial	--	ES-1	Footnote 1	--	Not sure what this is referring to?	Typo has been corrected
BA-9	Bob Abrams	Editorial	--	ES-1	Footnote 2	*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 2024 begins on October 1, 2024 and will end on September 30, 2025.*	Need to explain how this apparent mismatch will be managed in the document and in future. Water Year and Court Water Year (when required)?	Clarification added to footnote.
BA-10	Bob Abrams	Editorial	--	ES-2	--	*Because the Judgment is still being implemented and subject to appellate court review, its effect on FCGMA's implementation of the LPVB GSP and sustainable management of the LPVB is uncertain.*	Not clear what this sentence achieves? Suggest re-wording or deleting.	This sentence is to advise DWR that there may be impacts to the implementation of the LPVB GSP that are not currently understood. Future GSP evaluations may need to explain how implementation has differed from what is presented here, and the reasons why.
BA-11	Bob Abrams	Technical	--	ES-2	--	--	Groundwater elevations in the GCA in WLPMA are not mentioned? This is inconsistent, as it is mentioned for ELPMA Need to mention that there are few wells in the GCA in WLPMA and this is an area of uncertainty? Or is it the intention to call the FCA/GCA the LAS in WLPMA as per Table 2.2 and brush over the lack of aquifer specific wells?	The lack of aquifer specific wells was discussed thoroughly in the GSP and is presented clearly in the GSP evaluation. The Watermaster will develop estimated costs and a spending plan, with committee consultation, to include in Watermaster's annual budget for funding through basin assessments to provide funding to install additional dedicated monitoring wells and transducers. There are no monitoring wells screened solely in the GCA in the WLPMA and only one in the ELPMA. This is a data gap that FCGMA has sought to fill by pursuing SGM grant funding for monitoring wells in the LPVB.
BA-12	Bob Abrams	Editorial	--	ES-2	--	*Groundwater elevations central ELPMA near the CMWD ASR well field*	Suggested addition in red text: Groundwater elevations in central ELPMA near the CMWD ASR well field	Revised
BA-13	Bob Abrams	Editorial	--	ES-4	--	*groundwater levels in the WLPMA should be maintained at elevations that are high enough to not inhibit the ability of the Oxnard Subbasin to prevent net landward migration of the saline water impact front*	Can this be re-written? This is expressed more clearly on page 17 as "…groundwater levels, significant and unreasonable loss of groundwater in storage, and, in the WLPMA, will not prevent the Oxnard Subbasin from achieving its sustainability goal"	This is a quote from the GSP and cannot be revised.
BA-14	Bob Abrams	Editorial and Technical	--	ES-4	--	*The largest administrative uncertainty is related to how the LPVB Judgment will impact FCGMA's ability to implement the GSP and sustainably manage the LPVB,*	This is a subjective comment and could be deleted. Or the red text could be added. Suggest this document should focus on technical uncertainties rather than administrative. "The largest administrative uncertainty is related to how the LPVB Judgment will impact FCGMA's ability to implement the GSP and sustainably manage the LPVB,"	This evaluation is required, under SGMA, to cover both the technical and administrative implementation components as both impact the ability of an agency to successfully implement the GSP. "Administrative" has been added to the sentence as suggested.
BA-15	Bob Abrams	Technical	--	10	--	*Groundwater elevation was not measured in well 02N20W12MMW1 in water year 2024*	Is it worth noting the reason why the elevation was not measured in this key well? Leaving it as unexplained reduces the robustness of data reporting.	Noted. FCGMA will work to include field notes, as appropriate, in the future.

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BA-16	Bob Abrams	Technical	--	11	Table 2.2		The Table would be stronger if there was a column or note explaining why key wells were not measured, otherwise it looks like poor groundwater management – there are lots of '-' cells indicating data not collected, which is obviously disappointing.	Same as above.
BA-17	Bob Abrams	Editorial	--	13	FCA third paragraph	*Fall groundwater elevations decreased ~~from~~ by less than a foot to 48 feet*	To avoid confusion - the 'from' in the sentence could be read as ft msl, when the intention is to show the change in elevations. Previous paras and next sentence are clearer.	Revised
BA-18	Bob Abrams	Technical	--	13	GCA	*Sufficient measurements were not collected by the monitoring agency to evaluate the change in groundwater elevation for fall 2015 to fall 2023 and spring 2015 to spring 2024.*	Explain the reasons and note that it remains an area of uncertainty? Otherwise, it looks like it is being glossed over.	The text has been revised to not that this remains an area of uncertainty.
BA-19	Bob Abrams	Editorial	--	15	--	*Fall 2023 groundwater elevations were below the 2025 interim milestones in ~~the~~ two of the key wells in the WLPMA*	typo	Revised
BA-20	Bob Abrams	Technical	--	19	1st paragraph	*The lack of measurements at these two wells creates data gaps in the characterization of groundwater conditions within the LPVB.*	Is there any proposal to replace these two key wells with new or other wells? It would counterbalance the negative.	Yes. FCGMA is investigating whether these wells can still be used or need to be replaced.
BA-21	Bob Abrams	Editorial and Technical	--	22	Table 2-4b	--	Title of last "Outflow" column is "Subsurface flow to the ELPMAa" Footnote "a" states, "Represents simulated underflows from the East Las Posas Management Area" Do these contradict? Footnote should say "to"? With respect to flow from WLPMA to ELPMA, reference Section 5.1.1 because new finding and still being evaluated.	Table header has changed and clarification has been added to the footnote.
BA-22	Bob Abrams	Editorial	--	23	Table 2-4c	--	First column of "Outflow" is "Outflow to PV1" Should that be PVB?	Revised
BA-23	Bob Abrams	Technical	--	26	Table 2-6	--	Column labeled "Aquifer" has many instances of "Unknown" Can the aquifer be ascertained by well depth, well completion data, local stratigraphy, well chemistry etc? Collecting data from wells without knowing the aquifer diminishes the value of that data. Doing statistics on data of unknown provenance is questionable/not robust	Table has been corrected to reflect the designations in the GSP.
BA-24	Bob Abrams	Technical	--	28	4th paragraph ELPMA groundwater quality	*While recent data doesn't suggest a link between groundwater quality degradation and groundwater production during the evaluation period*	Increasing trends are noted in a number of wells. While the conclusion is that there is no link between increasing trends and GW production, there is a notable absence of explanations for the increasing trends. If not GW production, then what local conceptual site model is postulated to cause the increases?	There are natural variations in water quality that can occur without being influenced by groundwater production. The key to determining whether groundwater production is causing, or exacerbating, degradation of groundwater quality is to look for both spatial and temporal trends in water quality samples. There are no consistent spatial and temporal trends that suggest water quality degradation is occurring as a result of groundwater production in the LPVB.
BA-25	Bob Abrams	Technical	--	28	2.5.2.1 WLPMA	*TDS concentration data do not indicate that groundwater production since 2015 has caused degradation of groundwater quality*	The previous sentence suggests increases are occurring in wells completed in the USP, but not in the FCA/GCA. Would a hypothetical conceptual model be that groundwater production is pulling higher TDS water down from the USP and that there is a link? What is the TDS of USP groundwater?	The previous sentence was deleted from the text. There are not enough wells screened in the USP to generalize the trends. The TDS concentrations are presented in Figure 2-19.
BA-26	Bob Abrams	Editorial	--	40	3.1.2.3.2 last sentence	*A formal agreement to ensure future maintenance of these non-native flows will be evaluated ~~as~~ through the Basin Optimization Plan.*	typo	Revised
BA-27	Bob Abrams	Technical	--	41	Table 3-1	*Estimated Accrued Benefits at Completion: Recovery of groundwater levels that have contributed to seawater intrusion in the Oxnard Subbasin.*	Is not the biggest benefit of reduced groundwater production the reduced possibility of adverse effects, rather than a specific effect in Oxnard Subbasin?	Agreed. Revised.
BA-28	Bob Abrams	Technical	--	51	4.1.1.1.	*Projects have been identified to install additional monitoring wells and transducers in existing wells that would address data gaps in the ELPMA*	Why none in the WLPMA?	Monitoring wells were also proposed for the WLPMA (See Section 3.2.4 and 3.2.5). Typo in the text has been revised from "ELPMA" to "LPVB."
BA-29	Bob Abrams	Editorial	--	64	4.3.2.3	*Between 2003 and 2022, recycled water in the ELPMA was used exclusively for municipal and industrial uses.*	Missing word?	Revised
BA-30	Bob Abrams	Editorial	--	70	5.2.1.3	*climate change factors ~~.~~ , with the noted exception that*	typo	Revised
BA-31	Bob Abrams	Editorial	--	73	5.2.2	*...model runs that resulted in: (1) no net flux of seawater into either the UAS or LAS of the Oxnard Subbasin, ;*	typo	Revised
BA-32	Bob Abrams	Technical	--	226 and 228	Figures 5-23a, b	--	Why are the simulated hydrographs shifted by -60 and +70 feet?	The starting elevations of the model simulations differed from the observed elevations. Therefore the simulations were shifted to match the observed data.
BA-33	Bob Abrams	Technical	--	73	5.2.2	*Due to the connection between the WLPMA and Oxnard Subbasin, the sustainable yield was evaluated using the model runs that resulted in: (1) no net flux of seawater into either the UAS or LAS of the Oxnard Subbasin,, (2) no landward migration of the saline water impact front in the Oxnard Subbasin, and (3) no chronic lowering of groundwater levels in WLPMA.*	Understood that the subbasins are connected, but shouldn't the focus of sustainability be on the LPVB? The numerous particle tracking figures don't even show the LPVB. What is a LPVB stakeholder supposed to think about this?	This is the same approach that was used in the GSP. The particle tracks are presented to show the modeled influence of each scenario on seawater intrusion. These are relevant to the WLPMA, which is included within the model domain because it is hydrogeologically connected to the adjacent Oxnard Subbasin.
BA-34	Bob Abrams	Editorial	--	89	--	*No New Projects Scenario Model Results*	Should this be 'Arundo Removal Scenario Model results'?	Text has been revised to "Projects Scenario"

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BA-35	Bob Abrams	Technical	--	97	6.2.2.	*the existing monitoring network in the LPVB is sufficient to document groundwater and can be used to document progress toward the sustainability goals for the LPVB.*	The loss of key well monitoring wells has not really been addressed – either the GSP had too many key wells, or this statement isn't really true?	The GSP identified an appropriate number of key wells. However, as discussed above, additional wells with known screen intervals would improve the monitoring network. This is a data gap that FCGMA has sought to fill by pursuing SGM grant funding for monitoring wells in the LPVB. Additionally, the Watermaster plans to develop estimated costs and a spending plan, with committee consultation, to include in Watermaster's annual budget for funding through basin assessments that could be used to install additional dedicated monitoring wells and transducers.
BA-36	Bob Abrams	Editorial and Technical	--	98	6.2.2.1	*The removal of 02N21W16J03S limits characterization of groundwater conditions in the eastern part of WLPMA, where groundwater elevations are influenced by operations in the Oxnard Subbasin*	Typo. Also, are GW elevations in the eastern part of WLPMA influenced by Oxnard? More likely wells in western part of WLPMA?	Revised. Well is in the western WLPMA, not the eastern WLPMA.
BA-37	Bob Abrams	Technical	--	98	6.2.2.1	*As noted above, FCGMA anticipates evaluating projects that help to fill these critical data gaps as part of the Basin Optimization Plan*	Insufficient urgency demonstrated? Only one new well installed since 2019.	Text has been revised and a sentence added to discuss seeking funding.
BA-38	Bob Abrams	Editorial	--	107	8.3	*with FCGMA holding regular meetings ~~with~~ to coordinate on projects*	typo	Revised
BA-39	Bob Abrams	Editorial	--	110	9.3	*Because the Judgment is still being implemented and subject to appellate court review, the effect of the Judgment on FCGMA's implementation of the LPV GSP and sustainable management of the LPV Basin is uncertain at this time.*	Not clear what this sentence achieves? Suggest rewording or deleting (ame as p ES-2, above)	This sentence is to advise DWR that there may be impacts to the implementation of the LPVB GSP that are not currently understood. Future GSP evaluations may need to explain how implementation has differed from what is presented here, and the reasons why.
BA-40	Bob Abrams	Editorial	--	112	10	*~~Revisions~~ Reductions to the monitoring network, including the key well network*	The word "reduction" is a more accurate representation of facts	"Revisions" is the term used in DWR's guidance document.
TM-1	Tony Morgan	Editorial	--	ES-1	Table ES-1, 4th row, last column	--	subsidence is not discussed in Section 7.2	Revised
TM-2	Tony Morgan	Technical	--	7	2.2.1.1	*prevent chronic lowering of groundwater levels*	is chronic lowering of water levels currently a WLPMA condition? That message doesn't seem to be a prevalent message throughout the document.	As stated in the evaluation, the primary sustainability goal identified in the GSP for the LPVB is to "maintain a sufficient volume of groundwater in storage in each management area so that there is no significant and unreasonable net decline in groundwater or storage over wet and dry climatic cycles." Additionally, the GSP states that "the criterion used to define undesirable results for chronic lowering of groundwater levels in the eastern part of the WLPMA is groundwater levels that indicate a long-term decline over periods of drought and recovery." This has been added to the discussion of the sustainability goal in section 2.1
TM-3	Tony Morgan	Technical	--	7	2.2.1.2, first paragraph	*to limit the area of the FCA that would convert from confined to unconfined conditions with declining water levels,*	the undesirable condition is a conversion of the aquifer from confined to unconfined. The following paragraph moves from a discussion of the aquifer transitioning from confined to unconfined, to an individual well?	The second paragraph of section 2.2.1.2 and Table 2-1 identify wells located within areas of the WLPMA subject to aquifer conversion to evaluate potential impacts to well operators.
TM-4	Tony Morgan	Technical	--	7	2.2.1.2, second paragraph	*would result in projected groundwater elevations that are below the top of the well screen in nine wells*	declines in water levels to below the top of screen does not necessarily equate to the dewatering of the aquifer. Not clear how this analysis helps assess the potential for CONF-UNCONF conversion. A more powerful analysis would be to determine the tops of the confined aquifer and then compare to a declining water level.	The purpose of this review was to look at impacts to stakeholders within the area that was already designated as prone to conversion in the GSP.
TM-5	Tony Morgan	Editorial	--	24	2.3.2.1, Lower Aquifer System	*approximately 32,970 AF since 2015 (Table 2-5)*	value doesn't match Table 2-5	Revised
TM-6	Tony Morgan	Editorial	--	24	Table 2-5., West Las Posas / LAS row	--	-34,780+1,810 = -32,970	Corrected.
TM-7	Tony Morgan	Technical	--	26	2.5.1	*describe efforts to evaluate the connection between groundwater production and groundwater quality*	Was this accomplished in the document?	This effort is described in Section 2.5.1 and its subsections. The text has been expanded to better characterize the work done to address DWR's recommended corrective action.
TM-8	Tony Morgan	Technical	--	26	2.5.1	*progress made toward evaluation of the causal relationship referenced in the GSP.*	Where is this addressed in the document?	This effort is described in Section 2.5.1 and its subsections. The text has been expanded to better characterize the work done to address DWR's recommended corrective action.
TM-9	Tony Morgan	Technical	--	28	2.5.1.2, last paragraph	*While recent data doesn't suggest a link between groundwater quality degradation and groundwater production during the evaluation period,*	Where are these data presented?	These data are presented in Section 2.5.1 and its subsections. The text has been expanded to better characterize the work done to address DWR's recommended corrective action.
TM-10	Tony Morgan	Technical	--	32	2.6.2	*critical infrastructure*	What are the criticial infrastructure? Their location(s) are not shown on Fig 2-29.	Text has been revised to note that no critical infrastructure has been identified in the LPVB that could be impacted by land subsidence related to groundwater pumping.

Item 20D - Watermaster Response - TAC

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Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment	Watermaster Response
TM-11	Tony Morgan	Editorial	--	35	3	*Both the Basin Optimization Plan and Basin Optimization Yield Study are developed by FCGMA, as Watermaster for the LPVB, with consultation, review, and recommendation from the LPVB PAC and TAC.*	Change to: "Both the Basin Optimization Plan and Basin Optimization Yield Study are planned to be developed by FCGMA, as Watermaster for the LPVB, with consultation, review, and recommendation from the LPVB PAC and TAC."	Revised to "are being"
TM-12	Tony Morgan	Technical	--	37	3.1.1.1.3, Impacts to beneficial uses and users	*potential groundwater-surface water connections.*	these connections are not highlighted/identified in this document. Why mention them here?	Deleted.
TM-13	Tony Morgan	Technical	--	39	3.1.2.1.2, Expected Benefits	*prevent declines in groundwater elevation, loss of storage, and land subsidence by*	These benefits are logical, but are they actually needed to lessen declines in groundwater elevations, loss of storage, or land subsidence. Other sections in this document do not identify undesirable results associated with them (e.g., subsidence).	Revised to "undesirable results"
TM-14	Tony Morgan	Technical	--	39	3.1.2.1.2, Impacts to beneficial uses and users	*chronic lowering of groundwater levels,*	is chronic lowering of groundwater a risk in the WLPMA?	Chronic lowering of groundwater levels is a risk in the WLPMA.
TM-15	Tony Morgan	Editorial	--	40	3.1.2.3.2, Realized Benefits, second paragraph	*A formal agreement to ensure future maintenance of these non-native flows will be evaluated ~~as~~ through the Basin Optimization Plan.*	typo	Revised.
TM-16	Tony Morgan	Editorial	--	41	Table 3-1, first row, second column	*Reduce Groundwater production by monitoring and imposing quantitative limits on pumpers; with governing authority from the FCGMA Board as the Watermaster .*	recommend adding red text	Added.
TM-17	Tony Morgan	Editorial	--	42	3.2.1.1	*decrease groundwater demand in the LPVB by 2,300 AFY.*	section below says groundwater demand would be decreased by 500 AFY	The text and tables have been revised.
TM-18	Tony Morgan	Editorial	--	42	3.2.1.2, Expected Benefits	*It is estimated that implementation of this project would decrease groundwater demand in the LPVB by approximately 500 AFY.*	paragraph above says groundwater demand would be decreased by 2,300 AFY	The text and tables have been revised.
TM-19	Tony Morgan	Technical	--	43	3.2.1.2, Expected Benefits	*which directly addresses undesirable results associated with degraded water quality,*	what degraded water quality impacts are attributable to the GSP's management of the basin?	Text has been revised to note the origin of the water quality degradation.
TM-20	Tony Morgan	Technical	--	43	3.2.1.2, Expected Benefits	*reducing groundwater demands in the LPVB.*	how does the pumping of groundwater to supply the desalter achieve a reduction in groundwater demands?	Deleted.
TM-21	Tony Morgan	Technical	--	43	3.2.1.2, Impacts to beneficial uses and users	*helping to prevent groundwater elevation declines*	the desalter needs a source of water to treat - groundwater. Not clear how this project reduces groundwater demand and therefore prevents groundwater elevation decline.	Deleted.
TM-22	Tony Morgan	Technical	--	44	3.2.3.1	*would provide up to 2,000 AFY of recharge.*	how much of the 2,000 AFY of recharge would have normally been recharged downstream of the percolation ponds or in the PVB? Is this expected to be 2,000 AFY net of the "normal" recharge?	The initial benefit analysis was provided by VCWWD-1, the project proponent. The answers to your question should be explored in more detail when conducting further feasibility analysis of this specific project, which is outside the scope of the GSP evaluation.
TM-23	Tony Morgan	Technical	--	45	3.2.4.1	*would provide data on whether the vegetation in the riparian corridor relies on groundwater or soil moisture from infiltrating surface water.*	other sections stated that vegetation is not dependent on groundwater. This seems to be backtracking on the conclusions offered elsewhere.	Revised
TM-24	Tony Morgan	Editorial	--	54	4.3.2.1	*approximately 35,100 AFY of groundwater*	Recommend changing to "...an average of approximately 35,100 AFY of groundwater..."	Revised
TM-25	Tony Morgan	Technical	--	77	Table 5-2, first column, second row	*Seawater Flux into the Oxnard Subbasin* [b]	it is a little misleading to show the SWI values as a single number when in reality the modeling results have an error bar associated with them (e.g., 500 AFY +/-200 AFY). The single value presented in the table suggests a more exact rate than we have data to support. Can error estimates be added to the table?	Uncertainty has been added to the footnote of the table.
TM-26	Tony Morgan	Editorial	--	77	Table 5-2, footnotes	--	Last footnote should be 'd'	Revised
TM-27	Tony Morgan	Technical	--	98	6.2.2.3	*13 wells that were to be monitored for groundwater quality are no longer monitored for groundwater quality.*	Seem appropriate to provide the reader with some idea of why so many wells are no longer monitored. Were the wells destroyed, landowner access denied, data determined to be redundant, monitoring entity dropped these wells from their suite of monitored wells, or ??.	Revised wording to reflect correction from CMWD
TM-28	Tony Morgan	Technical	--	99	6.4	*monitor subsidence*	Is it anticipated that an annual report will be produced? Will the report address inferred land surface movement near critical infrastructure? If so, what infrastructure?	This will be reported in the regular GSP annual report. Thus far, no critical infrastructure has been identified by stakeholders in the LPVB that may be subject to significant and unreasonable land subsidence that substantially interferes with surface land uses.
TM-29	Tony Morgan	Editorial	--	103	7.1.3	*As described in Section 3.1, Evaluation of Projects and Management Actions, the Judgment adjudicated water rights in the basin and established an allocation system based on those water rights. The Judgment allocations supersede the allocations developed and adopted by FCGMA in 2019.*	This paragraph seems to fit better in 7.1.2 Extraction Allocations.	Revised

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TM-30	Tony Morgan	Technical	--	110	9.3, Las Posas Valley Water rights Coalition, et al. v. Fox Canyon Groundwater Management Agency, Santa Barbara Sup. Ct. Case No. VENC100509700	*adopts a physical solution that requires FCGMA to prepare new studies and reports designed to maintain an annual operating yield for the LPVB at 40,000 AFY*	This GSP puts the sustainable yield at ~27K-34K AFY with projects. The judgment requires a sustainable yield of 40K AFY. What is the GSA (Watermaster?) doing to get to the 40K AFY value? Was this discussed in the GSP?	FCGMA is the groundwater sustainability agency (GSA) and the special act water agency designated by the Legislature to manage and conserve the LPV Basin's groundwater resources. (Judgment, § 3.3.) The judgment appoints FCGMA to be Watermaster for the LPV Basin. (Judgment, § 3.3.) "[T]he Judgment unites the FCGMA's role as the GSA for the Basin with its responsibilities as Watermaster" and tasks FCGMA to "continue in its role as the GSA for the Basin, fulfilling its SGMA statutory obligation, and will simultaneously integrate those regulatory responsibilities and authorities with its role as Watermaster under the Judgment." (Judgment, § 3.3.) The judgment provides "to the extent that it is feasible and cost-effective, Watermaster shall seek to augment the Basin Optimization Yield, and ultimately the Sustainable Yield, to be no less than 40,000 AFY." (Judgment, § 4.9.1.2). The judgment requires the Watermaster to prepare a Basin Optimization Plan on a five-year basis to identify the 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). Potential projects are identified and discussed in section 3.2 of the GSP Evaluation.
TM-31	Tony Morgan	Technical	--	Appendix A, A-1	A.1	*identify specific locations where Arroyo Simi-Las Posas is connected to the underlying aquifer and*	Is there a map or ?? showing these locations?	There is no current map showing these locations
TM-32	Tony Morgan	Technical	--	Appendix A, A-2	A.2, first paragraph on page	*recharge of the surface water discharges*	Helpful to reader to identify these surface water discharges. Can the surface water discharges be quantified (e.g., time series)? What values were used for the groundwater model?	Text has been revised.
TM-33	Tony Morgan	Technical	--	Appendix A, A-2	A.3, last sentence in first paragraph	*This indicates that groundwater production in the principal aquifers of the ELPMA has not impacted the groundwater level in the shallow alluvial aquifer adjacent to the Arroyo near well MMW-1.*	This implies limited interconnection between the principal and shallow aquifers. Is this conclusionary statement consistent with the findings from the groundwater flow model? If so, suggest stating the model is supportive of these observations. If not, then why the difference.	The sentence has been modified to be specific to the observation. The intent is not to say that the two are disconnected, just that the increased pumping over the last 15 years hasn't impacted the water levels in the shallow aquifer. There are multiple potential reasons for the pumping not to have impacted the water levels. These could be explored in the future if needed.
TM-34	Tony Morgan	Technical	--	Appendix A, A-2	A.4, first paragraph	*interconnected surface water bodies*	Were the interconnected surface water bodies identified?	Specific reaches of Arroyo Simi-Las Posas may be interconnected, but no recent work has been done to verify this. FCGMA sought funding to install additional monitoring wells to update the understanding of the connection between the aquifers, but did not receive funding. Installation of additional monitoring wells and updating the understanding of gaining and losing reaches of Arroyo Simi-Las Posas are projects that should be pursued over the upcoming years.
TM-35	Tony Morgan	Editorial	--	Appendix A, A-2	A.4, first paragraph	*has not occurred in relation to current groundwater production, although this could occur in the future if upstream surface water discharges decrease.*	is this sentence saying that depletions of interconnected surface waters due to pumping could occur if upstream surface water discharges decrease? Suggest splitting the sentence into two. Add a period after "...groundwater production." Create a new sentence to say "Interconnected surface water bodies could occur in the future if upstream surface water discharges decrease."	Text has been revised to state "Depletions of interconnected surface water bodies could occur in the future if upstream surface water discharges decrease."
CT-1	Chad Taylor	Editorial	--	1	Table 1-1, fourth row, second column	*As a result, FCGMA anticipates approximately more flow in Arroyo Simi-Las Posas than previously assumed for the GSP*	Is this a typo, or should a value of additional flow be included here?	Typo - "approximately" has been removed
CT-1	Chad Taylor	Technical	--	1	Table 1-1	*Infrastructure Improvements to Zone Mutual Water Company's water delivery system*	This project may need to be modified based on feedback from Bryan Bondy regarding ZMWC's ability to finance improvements. TAC recommendations on the projects for the Basin Optimization Plan include changing this to a Basin-wide feasibility study to increase transfers between management areas.	Noted. Thank you for your comment.
CT-1	Chad Taylor	Technical	--	2	Table 1-1	*Projects to Address Data Gaps, Installation of Additional Groundwater Monitoring Wells and Installation of Additional Groundwater Monitoring Wells*	These are important projects that should be advanced quickly. See later comments on monitoring adequacy.	Agreed.
CT-1	Chad Taylor	Editorial	--	4	2.1, second paragraph on page	*At the time the GSP was prepared, the groundwater elevations were below the minimum threshold groundwater elevations in ~~the a~~ four of the five key wells in WLPMA, the only key well in the Epworth Gravels Management Area, and one well in the ELPMA.*	Typo	Revised
CT-1	Chad Taylor	Technical	--	7	2.2.1.2, second paragraph	*The depth and groundwater production rates from the wells in this area indicate that they are agricultural wells and are not domestic or de minimis wells that produce less than 2 acre-feet per year (AFY).*	Recommend showing the all the data included in and results of this analysis in figures and tables. Table 2-1 shows only perforated interval depths, not production rates that would distinguish domestic wells from those for other uses.	Well use has been added to the table
CT-1	Chad Taylor	Technical	--	8	Table 2-1, 6th column	--	18 percent of wells (4 of 22) with reduced capacity seems high	Noted. Thank you for your comment.
CT-1	Chad Taylor	Technical	--	8	Table 2-1, 7th column	--	2 wells out of 22 is 9%. That is a fairly large percentage of wells going dry.	Noted. Thank you for your comment.

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CT-1	Chad Taylor	Technical	--	8	2.2.1.2, second paragraph on page	*Loss of production at the minimum threshold groundwater elevations represents a loss of between 1% and 3% of the total production from the management area.*	The DWR Recommended Corrective Action requested discussion of the effects of the MTs and MOs on beneficial uses and users. This analysis only discusses the MTs. Additionally, contextualizing the reductions in production ability from these wells in the context of the entire production from the management area may not meet DWR expectations regarding effects on beneficial users. Recommend including discussion of effects on individual well owners. Also, will there be a dry well mitigation program in case wells do go dry?	A discussion of the impacts at the MOs has been added to the text. The discussion of potential impacts refers back to the selection of the 20% storage loss threshold evaluated in the GSP, as a level of significance for the FCGMA board. Development of a dry well mitigation program is a good suggestion for future evaluation.
CT-1	Chad Taylor	Technical	--	9	2.2.1.3, first paragraph	*As groundwater elevations decline in the Epworth Gravels aquifer, groundwater users in this management area rest their Epworth Gravels aquifer wells and rely on water from the FCA instead.*	Can this practice be incorporated into a management action?	This practice is covered under Management Action Number 1 in the GSP - Reduction in Groundwater Production.
CT-1	Chad Taylor	Editorial	--	9	2.2.1.3, second paragraph	*The GSP reported on groundwater conditions through fall 2015. The change in water levels since 2015 varies geographically within the LPVB, reflecting both the influence of groundwater extraction and the availability and extent of groundwater recharge in the WLPMA, ELPMA, and Epworth Gravels Management Area.*	This paragraph seems out of place. Is it supposed to follow the header for 2.2.2?	Moved.
CT-1	Chad Taylor	Editorial	--	9	2.2.2.1 Upper San Pedro Formation	*There are no key wells screened in the USP because it is not a **primary** aquifer…*	Should primary be principal?	Revised
CT-1	Chad Taylor	Technical	--	9	2.2.2.1 Fox Canyon Aquifer	*In the western part of the WLPMA, adjacent to the Oxnard Subbasin, fall 2023 and spring 2024 groundwater elevations in the FCA were approximately 55 to 35 feet higher than they were in fall 2015 and spring 2015, respectively (Figure 2-7, Fox Canyon Aquifer – Groundwater Elevation Changes from Fall 2015 to 2023, and Figure 2-8, Fox Canyon Aquifer – Groundwater Elevation Changes from Spring 2015 to 2024). Groundwater elevations in this part of the WLPMA were also higher than they were in fall 2019, the start of the current evaluation period (FCGMA 2021). Groundwater elevation recoveries in the western WLPMA since 2015 reflect the influence of UWCD's recharge operations in the Forebay Management Area of the Oxnard Subbasin, which promoted groundwater elevation recoveries in the Oxnard Subbasin of approximately 120 feet between 2015 and 2024 (FCGMA 2024a).*	These statements are based solely on one monitoring well at the extreme western end of the WLPMA. That data limitation should be discussed somewhere.	Text was added to further note the limitations of the data. The figures are presented with the text so that all readers can see the data collected and used to develop the discussion in the text.
CT-1	Chad Taylor	Technical	--	10	2.2.2.1, first paragraph on page	*In contrast, groundwater elevations in the eastern part of the WLPMA were lower in the fall of 2023 than they were in fall 2015 (Figures 2-7)8. The largest groundwater elevation decline measured over this period was at well 02N20W06R01S, where the fall 2023 groundwater elevation was approximately 80 feet lower than fall 2015 (Table 2-2, Water Year 2024 Groundwater Elevations at Key Wells in the Las Posas Valley Basin; Figures 2-7 and 2-8). Groundwater elevation declines in the eastern WLPMA reflect ongoing groundwater production in an area with limited groundwater recharge.*	The lack of consistent monitoring for comparing water levels may be the cause of the apparent difference between fall and spring comparisons. Inconsistent monitoring makes tracking sustainability very challenging, especially when there are so few Key Wells in the network. This problem may be skewing the assessment of sustainability and should be addressed immediately by adding dedicated monitoring wells that the FCGMA/Watermaster monitors or uses transducers to reliably measure water levels regularly.	Noted. The text is referencing a difference in the geographic water level changes in the fall, only. It is not comparing the difference between the fall and spring changes, because of the lack of data. The text has been revised to clarify this distinction.
CT-1	Chad Taylor	Technical	--	10	2.2.2.1 Grimes Canyon Aquifer	*Two wells, 02N21W28A02S and 02N21W22G01S, had groundwater elevations measured in both spring 2015 and spring 2024.*	Spring to spring declines with no fall comparison due to inconsistent monitoring should raise concern.	Noted. Thank you for your comment.
CT-1	Chad Taylor	Editorial	--	14	2.2.3.1, first paragraph	*The GSP defined interim milestones for the key wells with groundwater elevations below the measurable objectives, so that groundwater elevations would reach the measurable objectives by 2040 (FCGMA 2019).*	Recommend referencing relevant section discussing Interim Milestones.	Section reference has been added
CT-1	Chad Taylor	Technical	--	14	2.2.3.1, second paragraph	*FCGMA has relied on other agencies for monitoring data but recognizes the need for more consistent monitoring of groundwater elevations in the WLPMA*	This should be prioritized using available funding sources, not waiting for grant funding as alluded to in other sections. Has the FCGMA considered the Technical Support Services available through DWR? Those may not be available now that the Basin is adjudicated, but worth asking about.	The Watermaster will work with partner agencies to formalize an agreement to monitor critical wells and will continue to pursue funding mechanisms to install additional dedicated monitoring wells, if possible. The referenced sentence is out of place here though and has been deleted.
CT-1	Chad Taylor	Editorial	--	14	2.2.3.1, second paragraph	*anticipates that groundwater elevations will rise between 2025 and 2040 with the implementation of projects and management actions in the WLPMA that are consistent with the GSP and Judgment.*	This seems a weak statement without further explanation of the mechanisms for increased groundwater elevations. Specifically, "anticipates' and "will rise" are very passive.	Agreed that this sentence is out of place in this section and has been deleted.
CT-1	Chad Taylor	Editorial	--	14	2.2.3.2	*In 2015, the end of the GSP reporting period, groundwater elevations in the WLPMA were above ~~than~~ the minimum threshold water levels at four of the five key wells in the management area (FCGMA 2019).*	Typo	Revised

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CT-1	Chad Taylor	Technical	--	15	2.2.3.2, first paragraph on page	*measured in three of the five key wells were measured in three of the five key wells*	40 percent of key wells were not monitored and 2/3 of those that were monitored were below the MT. The importance of more consistent monitoring cannot be stressed highly enough.	The Watermaster will work with partner agencies to formalize an agreement to monitor critical wells and will continue to pursue funding mechanisms to install additional dedicated monitoring wells, if possible.
CT-1	Chad Taylor	Editorial	--	15	2.2.3.2, first paragraph on page	*...minimum thresholds (Table 2-1).*	Table 2-2?	Revised
CT-1	Chad Taylor	Technical	--	15	2.2.3.2, first paragraph on page	*Spring 2024 groundwater elevations were above the minimum threshold groundwater elevations at all of the key wells measured in the WLPMA*	The spring 2024 measurements also included only 60% of Key Wells and the well that was furthest below the MT in fall 2023 was not included.	Noted. Text has been revised where appropriate. As discussed in previous responses, Watermaster will work to formalize agreements with monitoring partners to improve monitoring data.
CT-1	Chad Taylor	Editorial	--	15	2.2.3.3, first paragraph	*Fall 2023 groundwater elevations were below the 2025 interim milestones in the two the key wells*	missing word	Revised
CT-1	Chad Taylor	Editorial	--	15	2.2.3.3, first paragraph	*established interim milestones (Table 2-1).*	Table 2-2?	Revised
CT-1	Chad Taylor	Technical	--	17	2.2.5.3	*gained and updated numerical modeling conducted for this periodic evaluation (see Section 5, Updated Numerical Modeling)* ***suggest*** *that these thresholds are appropriate to prevent undesirable results in the LPVB*	This makes it sound like there is uncertainty regarding the effectiveness of the thresholds. Can this be strengthened, or is there significant uncertainty?	Sufficient uncertainty exists to warrant the use of the qualifier in this statement.
CT-1	Chad Taylor	Technical	--	19	2.2.5.3, last sentence of first paragraph on page	*The lack of measurements at these two wells creates data gaps in the characterization of groundwater conditions within the LPVB.*	SGMA characterizes data gaps as "a lack of information that significantly affects the understanding of basin setting or evaluation of the efficacy of the Plan implementation, and could limit the ability to assess whether a basin is being sustainably managed." Data gaps include not only limited geographic representation, but also monitoring sites that are unreliable. Once identified, as GSA must include a description in the GSP that addresses the data gaps (23CCR §354.38.) As noted above, a plan to address these data gaps should be developed and implemented as soon as possible.	Noted. The Watermaster will work with partner agencies to formalize an agreement to monitor critical wells and will continue to pursue funding mechanisms to install additional dedicated monitoring wells, if possible.
CT-1	Chad Taylor	Technical	--	19	2.3	--	While this section does acknowledge that undesirable results have occurred, it does not appear to address the DWR RCA request for discussion of potential effects of MTs and MOs on beneficial uses and users. Recommend including a discussion to this effect to address the DWR request.	As referenced in the text, the discussion of undesirable results and impacts to beneficial uses and users of groundwater is presented in section 2.2.4 and 2.2.5.2, because the change in storage undesirable results are tied to the groundwater elevation undesirable results.
CT-1	Chad Taylor	Technical	--	22	Table 2-4b	--	Why does this table show the average and not the total change in storage over the period? The sum of the annual changes in storage is a loss of 34,777 AF, which is 3.3 times the average annual inflow to the WLPMA. By comparison, the total change in storage for the ELPMA over the same period was a loss of 2,824 AF, which is only 10% of the average annual inflow to the management area. Recommend including and discussing the change in storage over the period as it represents significant sustained storage decline.	Sum has been added to the table and a sentence has been added to section 2.3.1.2
CT-1	Chad Taylor	Technical	--	24	2.3.2.1, Lower Aquifer System	*During the 2004 through 2010 period, the VRGWFM estimates that groundwater in storage in the LAS increased by approximately 1,810 AF (Table 2-5).*	Please explain this calculation. As presented it appears that the change in storage for the entire period of 2004 through 2010 was an increase of 1,810 AF, but the table makes it appear to be an estimate of annual storage change.	This was discussed in section 2.3.2 and in a footnote to section 2.3.1.2, but the text has been expanded in section 2.3.2 and the footnote has been added to the main text in section 2.3.1.2 for clarity.
CT-1	Chad Taylor	Editorial	--	24	Table 2-5, second row, 6th column	*-35,970*	should this be -32,970 as in the text above?	Revised
CT-1	Chad Taylor	Editorial	--	24	Table 2-5, East Las Posas information	--	Recommend explaining how the values in this table relate to those in Table 2-4c	Table 2-4C includes change storage for all model layers, including the Upper San Pedro Formation. Table 2-5 only reports storage change for the principal aquifers in the model. The text has been revised and expanded to explain the difference.
CT-1	Chad Taylor	Technical	--	26	Groundwater Quality	--	DWR's RCA for water quality included a request to further describe efforts to evaluate connections between groundwater production and quality, including evaluation of the "casual relationship" referenced in the GSP and document details of a process for determining if groundwater management and extraction are causing adverse impacts to groundwater quality. This discussion and documentation do not appear to have been included and neither is there a statement addressing DWR's request.	This effort is described in Section 2.5.1 and its subsections. The text has been expanded to better characterize the work done to address DWR's recommended corrective action.
CT-1	Chad Taylor	Technical	--	27	2.5.1.1	*Water quality in this area has been impacted by historical land uses and is generally tied to groundwater elevation (FCGMA 2019).*	This references the "casual relationship" DWR mentioned, but does not explain the reasons behind the statement or provide any plan for further assessment. Recommend being very careful about statements concerning connections between groundwater elevations and quality without evidence.	This is discussed further in the GSP, which is referenced in the sentence discussed, and specifically refers to the western part of the WLPMA where work was done prior to the GSP to develop the relationship between groundwater quality and groundwater level. The sentence does not apply to the entire LPVB.
CT-1	Chad Taylor	Technical	--	31	2.5.4	*changes in the groundwater quality do not appear to be correlated with decreases in groundwater elevation.*	Section 2.5.1.1. says there is a relationship. See comment on that section.	The text has been revised to distinguish the link between groundwater levels and water quality in the western and eastern portions of the WLPMA.

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CT-1	Chad Taylor	Technical	--	42	3.2.1	--	This project may need to be revised based on recent information presented to the TAC. See TAC Recommendation Report on the Basin Optimization Plan projects.	Noted. The project description was solicited as part of the FCGMA Board project prioritization process that commenced prior to formation of the TAC. The project description provided by the project proponent was used to incorporate the project into the model for the GSP evaluation. Revisions to the project description are planned for the Basin Optimization Plan.
CT-1	Chad Taylor	Technical	--	44	3.2.4	--	Recommend advancing this project as quickly as possible	Noted. Thank you for your comment.
CT-1	Chad Taylor	Technical	--	45	3.2.5	--	Recommend advancing this project as quickly as possible	Noted. Thank you for your comment.
CT-1	Chad Taylor	Technical	--	51	4.1.1.1, second paragraph	*These revisions are described in FCGMA (2024a).*	Please include information regarding the understanding of the LPVB and relevant information about the connection to Oxnard in this document.	The changes described are specific to the Oxnard Subbasin and are more appropriately described in the first periodic evaluation for the Oxnard Subbasin. The reference is provided for the interested reader.
CT-1	Chad Taylor	Technical	--	55	4.3.2.1, Comparison to Projected Groundwater Supplies	*approximately 10% lower than the average annual groundwater extractions over the 2021 and 2022 water years.*	42,400 - 36,100 = 6,300 AFY, and 6,300/42,400 = 15% (14.858).	Revised.
CT-1	Chad Taylor	Technical and Editorial	--	67	5.1.1, third paragraph	*These updates are summarized in FCGMA (2024a).*	Please include all new information relevant to the LPVB in this document	The changes described are specific to the Oxnard Subbasin and are more appropriately described in the first periodic evaluation for the Oxnard Subbasin. The reference is provided for the interested reader.
CT-1	Chad Taylor	Technical	--	68	5.1.1, first paragraph on page	*of the fault. As a result, the Coastal Plain Model simulates subsurface flows from the WLPMA to the ELPMA (Table 2-4c). These modeled flows are not integrated into the modeling conducted for the ELPMA.*	Why are the modeled flows between WLPMA and ELPMA not integrated into the modeling for the ELPMA? This raises a concern that the two LPVB management areas are not being modeled in a similar or complimentary way. The statement implies that the ELPMA model still uses a no flow boundary at the Somis Fault, which would be expected to produce very different flow and water budget results when compared to the Coastal Plain model that has a partial general head boundary along the fault. The potential for flow between ELPMA and WLPMA in the coastal plain model may also have an impact on seawater intrusion in Oxnard, and that potential is not discussed. Recommend reconsidering the disparity in the way the Somis Fault is modeled in the Coastal Plain and ELPMA models.	The Watermaster agrees that reconciliation of the models used could improve the understanding of the impact of management actions and projects in the LPVB and the interconnectedness of the basins. As stated in the next paragraph, "FCGMA anticipates coordinating with UWCD, in consultation with the LPVB TAC, to better coordinate the representation of this boundary between the ELPMA and WLPMA in both LPVB models."
CT-1	Chad Taylor	Technical and Editorial	--	68	5.1.1, third paragraph on page	*A broader discussion of updates to the Coastal Plain Model will be detailed in a technical memorandum prepared by UWCD.*	Where is this document? This seems like important information for the LPVB 5-Year GSP Evaluation	UWCD is currently working on the supplemental documentation to cover the changes made since the GSP. As of the time this comment response matrix was prepared, UWCD has not yet finalized this supplemental documentation.
CT-1	Chad Taylor	Technical and Editorial	--	68	5.1.2.1	*The ELPMA model extension, and validation, will be detailed in a technical memorandum prepared by FCGMA.*	When will this be available? Shouldn't this be available for committee review?	The tech memo was released with the final periodic evaluation.
CT-1	Chad Taylor	Editorial	--	69	5.1.2.1, first sentence on page	*simulation of future groundwater conditions.*	Sentence fragment	Not found in document.
CT-1	Chad Taylor	Technical	--	73	5.2.2	--	How do flows between WLPMA and ELPMA differ in the two models?	This is discussed in section 5.1.1
CT-1	Chad Taylor	Technical	--	78	5.2.2.1.3, No New Projects Scenario Assumptions	--	The percent change referenced for PVB is not consistent with the annual pumping values presented in the assumption summaries. I suspect this is a function of how the information is presented, but it should be checked and the text or percentages/volumes corrected. For instance, in NPP1 the summary says "a 20% reduction in both aquifer systems in the PVB and WLPMA" then references production volumes of "13,200 AFY in the PVB, and 10,800 AFY in the WLPMA." Comparing 13,200 AFY for NPP1 in the PVB to 13,900 AFY in Future Baseline shows a change of -5%, not 20%. All other scenarios have similar results when compared to baseline.	The 20% reduction references a 20% reduction in demand in the numerical model. However, in the Oxnard and Pleasant Valley basin, reduced demand may not result in a 20% reduction in groundwater production as surface water is used conjunctively to meet demand.

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CT-1	Chad Taylor	Technical	--	90	5.2.3.1, Sustainable Yield without Future Projects	*All three simulations performed under the NNP Scenario avoided chronic lowering of groundwater levels in the WLPMA and reduced seawater intrusion in the LAS of the Oxnard Subbasin during the 30-year sustaining period and resulted in net freshwater loss from the UAS of the Oxnard Subbasin to the Pacific Ocean. Therefore, the simulation with the highest overall production rate, that also minimized impacts from adjacent basins, was identified as the best estimate of the sustainable yield of the Oxnard Subbasin, PVB, and WLPMA, in the event that no new future projects are implemented in each basin. The simulation with the highest total groundwater production rate from this scenario was NNP3 – under this simulation, an average of approximately 11,400 AFY of groundwater was pumped from the WLPMA (Section 5.2.2.1.3 No New Projects Model Scenario). This estimate of the sustainable yield is approximately 1,100 AFY lower than the estimate presented in the GSP (FCGMA 2019). Applying the estimate of sustainable yield uncertainty calculated during the development of the GSP for the sustaining period suggests that the sustainable yield of the WLPMA may be as high as 12,600 AFY or as low as 10,200 AFY (FCGMA 2019).*	This appears to be an arbitrary means of estimating sustainable yield. The values listed are simply the results of one of several production reduction scenarios not an assessment of the maximum "amount of groundwater that can be withdrawn annually without causing undesirable results." (DWR BMP for Sustainable Management Criteria, November 2017). The SMC BMP also indicates that sustainable yield should be a single value, not a range as presented here. Please provide more information regarding the methods for estimating uncertainty in the sustainable yield estimate.	The sustainable yield of the WLPMA is based on the minimized production reduction scenario that resulted in no net seawater intrusion in the Oxnard Subbasin over the sustaining period. This is based on the method used in the GSP. But the method used to estimate sustainable yield in the GSP evaluation improves on the previous method, as requested by stakeholders, by conducting iterative model runs to reach a sustainable pumping rate for the Oxnard Subbasin, Pleasant Valley Basin, and WLPMA, collectively, as these basins are hydrogeologically interconnected. The Watermaster welcomes suggested improvements to the modeling and sustainable yield calculation for discussion and potential incorporation into the BOY and future GSP evaluations. The GSP evaluation includes both a single sustainable yield estimate, by management area, and an uncertainty range. The range of sustainable yield presented in the GSP evaluation represents the uncertainty bounds around the single sustainable yield value. A detailed description of the quantitative uncertainty analysis is provided in section 2.4.5 of the GSP. This evaluation does not change or update that uncertainty analysis.
CT-1	Chad Taylor	Technical	--	90	5.2.3.1, Sustainable Yield with Future Projects	--	See comment on sustainable yield without future projects regarding how to define sustainable yield.	Please see response to comment on sustainable yield without future projects above.
CT-1	Chad Taylor	Technical	--	90	5.2.3.1, Sustainable Yield with Future Projects, third paragraph	*the sustainable yield of the WLPMA may be as high as approximately 13,040 AFY or as low as 10,640 AFY.*	Please explain how this range was estimated.	The detailed description of the quantitative uncertainty analysis is provided in the GSP.
CT-1	Chad Taylor	Technical	--	90	5.2.3.1, Sustainable Yield with UWCD's EBB Water Treatment Project	--	See comment on sustainable yield without future projects regarding how to define sustainable yield.	Please see response to comment on sustainable yield without future projects above.
CT-1	Chad Taylor	Technical	--	91	5.2.3.1, Sustainable Yield with UWCD's EBB Water Treatment Project, second paragraph on page	*approximately 14,700 AFY or as low as 12,300 AFY.*	Please explain how this range was estimated.	The detailed description of the uncertainty calculation is provided in the GSP.
CT-1	Chad Taylor	Technical	--	91	5.2.3.2, Sustainable Yield without Future Projects	--	See comment on WLPMA sustainable yield without future projects regarding how to define sustainable yield.	Please see response to comment on sustainable yield without future projects above.
CT-1	Chad Taylor	Technical	--	91	5.2.3.2, Sustainable Yield without Future Projects, second paragraph	--	Please explain how this range was estimated.	The detailed description of the uncertainty calculation is provided in the GSP.
CT-1	Chad Taylor	Technical	--	91	5.2.3.2, Sustainable Yield with Future Projects	--	See comment on WLPMA sustainable yield without future projects regarding how to define sustainable yield.	Please see response to comment on sustainable yield without future projects above.
CT-1	Chad Taylor	Technical	--	97	6.2.2	--	See previous statements about consistency and the effects of data gaps on sustainable management.	Noted. Text has been revised, where appropriate, to clarify the discussion of data collection and filling of data gaps.
CT-1	Chad Taylor	Technical	--	97	6.2.2.1, last paragraph on page	*Importantly, since adoption of the GSP, several groundwater level monitoring wells have been removed from the monitoring network, including two key wells (Figure 6-3):* *▪02N20W04F02S, which was destroyed; and* *▪02N21W16J03S, which has not been measured since 2019.*	Is the monitoring network still adequate with the removal of these wells?	Text has been added to state that the monitoring network is still adequate, but could be improved by replacement monitoring wells.
CT-1	Chad Taylor	Editorial	--	106	8		Recommend including discussion of the TAC and PAC here as they are outreach, engagement, and coordination components	The PAC and TAC are discussed in the last full paragraph of section 8.1