FOX CANYON GROUNDWATER MANAGEMENT AGENCY

A STATE OF CALIFORNIA WATER AGENCY

June 25, 2025

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

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

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

BACKGROUND:
The Judgment requires Watermaster prepare a Basin Optimization Yield Study. (Judgment, §§ 3.3, 4.10, 5.1.) The Basin Optimization Yield Study (BOYS) will establish the operating yield, and in turn the amount and rate of rampdown, in each water year (WY) through WY 2039 so that the operating yield and sustainable yield for the Las Posas Valley (LPV) Basin match by WY 2040 and thus result in the LPV Basin being managed sustainably in accordance with the Sustainable Groundwater Management Act (SGMA) (Judgment, § 4.10.2.). Critical to the development of the of BOYS is the is Basin Optimization Plan (BOP), whose purpose is to evaluate and select the "Basin Optimization Projects that are likely to be practical, reasonable, and cost-effective to implement prior to 2040 to maintain the Operating Yield at 40,000 AFY [acre-feet per year] or as close thereto as achievable" (Judgment § 5.3).

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

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

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

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

Sincerely,

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

Attachments:

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

Draft Las Posas Valley Basin Optimization Plan

JUNE 2025

Prepared for:

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

Prepared by:

DUDEK
605 Third Street
Encinitas, California 92024

View online at:
https://fcgma.org/wp-content/uploads/2025/06/Draft-2025-LPV-Basin-Optimization-Plan.pdf

Link to Las Posas Valley Basin Optimization Plan

Approved by the Board JUNE 25, 2025

Prepared for:

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

Prepared by:

DUDEK
605 Third Street
Encinitas, California 92024

View online:
https://fcgma.org/wp-content/uploads/2025/07/2025-LPV-Basin-Optimization-Plan_Approved-20250625.pdf

LAS POSAS VALLEY WATERMASTER RESPONSE REPORT

Date: May 03, 2025

To: Las Posas Valley Watermaster Board of Directors

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

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

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

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

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

Projects selected for inclusion in the BOYS, as recognized by the BOP in Section 1.1 and 2.1, and prioritized for development and implementation, should meet the criteria established by Section 5.3.2.2 of the Judgment, that they be "likely to be practical, reasonable, and cost-effective to implement prior to 2040 to maintain the Operating Yield at 40,000 AFY or as close thereto as achievable." With this in mind, the PAC approached review of the proposed projects and programs against three criteria: cost; time to water supply production; and operational flexibility. Projects that meet these criteria, especially ones that are able to be implemented in short order, could provide immediate positive impacts. Such "quick wins" could demonstrate our collective capacity to develop solutions and encourage the necessary confidence in the process to persist through to basin sustainability.

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

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

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

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

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

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

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

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

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

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

Response to Recommendation 3:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

TO: Las Posas Valley Watermaster

FROM: Las Posas Valley Watermaster Policy Advisory Committee

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

DATE: February 6, 2025

Dear Las Posas Valley Watermaster,

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

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

Policy Rationale for Recommendation:
See memo below for rationale.

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

Tally of Committee Member Votes:

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

Report of Bases for Majority and Minority Committee Member Positions:

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

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

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

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

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

Projects selected for inclusion in the BOYS, as recognized by the BOP in Section 1.1 and 2.1, and prioritized for development and implementation, should meet the criteria established by Section 5.3.2.2 of the Judgment, that they be "likely to be practical, reasonable, and cost-effective to implement prior to 2040 to maintain the Operating Yield at 40,000 AFY or as close thereto as achievable." With this in mind, the PAC approached review of the proposed projects and programs against three criteria: cost; time to water supply production; and operational flexibility. Projects that meet these criteria, especially ones that are able to be implemented in short order, could provide immediate positive impacts. Such "quick wins" could demonstrate our collective capacity to develop solutions and encourage the necessary confidence in the process to persist through to basin sustainability.

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

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

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

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

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

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

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

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

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

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

Recommendation 5: Data mine existing water level data sets.

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

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

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

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

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

Recommendation 6: Project benefit interdependencies should be clearly analyzed.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

LAS POSAS VALLEY BASIN RESPONSE REPORT

Date: May 05, 2025

To: Las Posas Valley Watermaster Board of Directors

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

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

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

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

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

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

1.1 Recommendations:

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

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

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

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

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

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

RECOMMENDATION 2: REVISE HOW PROJECTS DEPENDENT ON OTHER PROJECTS ARE PRESENTED AND/OR PRIORITIZED
There are multiple projects described in the dBOP as dependent on one or more other projects. While there is a scoring metric for a project's dependency on other projects, as approved by the TAC, there is not a corollary scoring metric to increase the priority of projects on which other projects depend. Additionally, the institutional relationship between projects are not discussed or included in the

prioritization approach. For example, the Moorpark Desalter (Project 4) as described appears to be a critical project because the full benefits of three other projects (1, 3, and 5) are described as dependent on lowering groundwater levels in the Shallow Aquifer around the Arroyo Simi-Las Posas. The importance of the Moorpark Desalter extraction wells is described in the presentation of those other projects as the means to accomplish this reduction of groundwater levels, which will provide space in the Shallow Aquifer for additional groundwater recharge. Consequently, readers assume Project 4 should be included in the Basin Optimization Yield Study (BOYS). However, TAC members note that the institutional relationships between Project 4 and projects that would increase percolation along the Arroyo are important and need to be considered. Projects 3 and 4 have a common sponsor in Water Works District 1 and, as currently and historically defined, would be completed together and would only benefit Ventura County Water Works District 1 rate payers. Projects 1 and 5, like Project 3, seek to maintain or increase percolation along the Arroyo, but are sponsored by FCGMA, would presumably be paid through a basin assessment, and should therefore benefit all pumpers in the ELPMA. However, the percolation from these projects would help sustain increased pumping from Project 4, which would only benefit the Water Words District 1 rate payers. For this reason, it seems unlikely that there would be support for a basin assessment to pay for Projects 1 or 5 if the benefits would be partially or completely captured by Water Words District 1 rate payers. For this reason, Projects 1 and 5, as currently framed, appear to be incompatible with Project 4 from an institutional perspective. The dBOP should be revised to clearly identify the differences in the dependencies and incompatibilities of Projects 1, 3, 4, and 5.

2.1 Recommendations:

Consider revising how the dependencies are described in Projects 1, 3, 4, and 5.

- Include text regarding the institutional relationships between projects and identify institutional incompatibility of projects.
- Consider revisiting how interdependent projects are prioritized so that project on which other projects depend are prioritized at least as highly as those that depend on them.
- Consider including other factors on which projects in the dBOP depend, such as brine disposal for Project 4.
- Consider adding a graphic that visually conveys project interdependencies.

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

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

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

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

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

RECOMMENDATION 3: REVIEW AND ADDRESS APPARENT INCONSISTENCIES IN WATER SUPPLY / YIELD BENEFITS

TAC members identified multiple instances of inconsistent quantification of water supply benefits for projects in the dBOP. These inconsistent quantifications included assigning benefits to projects dependent on other projects without specifically addressing those dependencies (as described in Recommendation 2), presentation of the maintenance of existing conditions as a future benefit, and apparent misunderstandings or ineffective presentation of project effects on the LPVB water budget. If benefit quantification is undertaken the scoring of affected projects should be revisited.

3.1 Recommendations:

- Reconsider how the benefits from projects that are dependent on other projects are presented and scored. If the project on which another project depends does not move forward, then the benefits of the dependent project will not be realized. This recommendation applies to Projects 1, 3, and 5.
- Revise how the benefits associated with Project 4 are described. The current description indicates that pumping 6,720 AFY will increase recharge by 2,200 AFY, which was called out by three of the four reviewing TAC members as confusing or incorrect.
- Revise the water supply / yield augmentation benefit of Project 6 from the volume of diverted water to the volume of avoided evapotranspiration losses associated with current transfer methods.

Response to Recommendation 3:

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

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

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

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

RECOMMENDATION 4: CONSIDER REVISING AND ADDING TO DISCUSSION OF BENEFITS TO AND IMPACTS ON WATER QUALITY FROM PROJECTS

TAC members are concerned that several of the proposed projects may continue or worsen water quality impacts from recharging poor quality water along the Arroyo-Simi Las Posas. The GSP indicates that historical inflow from Simi Valley and percolated treated wastewater have caused high salt concentrations in the ELPMA. It is unclear how Projects 4 and 5 will improve groundwater quality by inducing additional recharge from these same sources.

4.1 Recommendations:

- Include discussion of water quality impacts and potential for benefits in the BOP and/or BOYS.
- Further clarify how water quality is expected to improve by implementing Project 4

Response to Recommendation 4:

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

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

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

RECOMMENDATION 5: INCLUDE IN LIEU DELIVERIES TO NORTHERN EAST LAS POSAS MANAGEMENT AREA (PROJECT 7) IN MODELING APPROACH

The TAC recommends including Project 7 in the BOYS project model scenarios. In discussing the project ranking in the dBOP, TAC member Bryan Bondy indicated that this project could be considered as feasible as Project 2 referenced above and should be included in the project modeling for the BOYS. Specifically, Mr. Bondy indicated that the infrastructure to deliver in lieu water to the northern ELMPA exists within the local Waterworks district and there is likely water available for in lieu delivery in all but the most extreme drought years. Our recommendation is to revise how this project is described in the BOP and will be presented in the related Recommendation Report.

This recommendation was also provided in response to the Committee Consultation request for the Basin Optimization Yield Study Modeling Approach submitted to the Watermaster on January 21, 2025.

5.1 Recommendations:

The TAC recommends reevaluating the scoring for Project 7 to prioritize it similarly to Project 2. Specific details of locations of in lieu deliveries and available volumes should be coordinated with the Waterworks District.

Response to Recommendation 5:

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

RECOMMENDATION 6: RECONSIDER HOW PROJECTS WITHOUT SPECIFIC WATER SUPPLY BENEFITS ARE CONSIDERED

The TAC noted that there are projects without specific water supply, augmentation, or yield improvement benefits included in the dBOP. While we understand that these are projects included in the GSP and/or Judgment and were assessed in the dBOP as a result, we do not know that they fit in the dBOP as presented. Given that the dBOP is intended to set the stage for the projects evaluated in the BOYS, it makes sense that projects without basin yield benefits would not score well or be given high priority. However, members of the TAC commented that these data gap filling projects have other benefits that should not be ignored when considering whether or not to move them forward. These comments and recommendations are specifically directed to Projects 9 and 10, which include

construction of dedicated monitoring wells and equipping monitoring wells with transducers for better water level data collection. While these projects do not have the potential to add yield to the LPVB, they are a mechanism for tracking groundwater conditions, identifying trends, and avoiding undesirable results in the basin.

6.1 Recommendations:

Consider evaluating data gap filling Projects 9 and 10 separately from the other projects in the BOP and advancing them without including them in the BOYS.

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

RECOMMENDATION 7: REEVALUATE PROJECT SCHEDULE CONSIDERING TAC MEMBER COMMENTS
TAC members commented that the schedule presented in Appendix C is too short for some projects and perhaps too long for others. We also noted that the schedule does not clearly identify which projects are proposed for advancement or the relationship between projects.

7.1 Recommendations:

Consider comments and recommendations in the attached tabular summary.

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

RECOMMENDATION 8: REEVALUATE PROJECT COST ESTIMATES AND PRESENTATION CONSIDERING TAC MEMBER COMMENTS
TAC members provided multiple comments, questions, and recommendations regarding the presentation of project costs. These comments identified missing cost estimate information for multiple projects, inconsistent presentation of costs, potential underestimates of costs, and omission of important cost components including operations and maintenance, funding mechanisms, future rate increases, etc. Consistent and complete cost estimate information is important for evaluating projects when costs are included in the prioritization criteria.

8.1 Recommendations:

Consider comments and recommendations in the attached tabular summary, including:

- Include all cost components for each project in a consistent format in the text and tables.
- Include capital expenses, operating expenses, and other costs for each project.
- Include reasonable changes in rates for unit based components of long-term projects.
- Describe likely funding mechanisms for each project, including both capital and operating expenses.

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

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

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

RECOMMENDATION 9: ACKNOWLEDGE AND PRESENT PLANS FOR CONSIDERING POTENTIAL EFFECTS ON NEIGHBORING BASINS
Potential impacts on neighboring basins are not well described in the dBOP. While these potential impacts may not be known until additional analysis is completed, the possibility of impacts to neighboring basins should be acknowledged in the dBOP.

9.1 Recommendations:

Add a subsection addressing the potential to impact neighboring basins for each project and describe how those potential impacts will be evaluated prior to project implementation.

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

RECOMMENDATION 10: REVIEW EDITORIAL COMMENTS PROVIDED BY TAC IN TABULATED COMMENT MATRIX
The TAC members each prepared detailed tabulated comments numbered by commentor with references to specific section and page numbers and quoted text. Many of these comments are editorial in nature and identify apparent errors in the dBOP, including typographic and formatting errors and unclear text.

10.1 Recommendations:

Consider revising the text to address the comments identified as editorial and clarification in the attached tabular comment matrix.

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

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

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment	Comment Response
BB-1	Bryan Bondy	Technical	Overarching Comment	N/A	N/A	N/A	While the BOP appears to meet the letter of the Judgment it does not appear to meet the spirit of the Judgment to "optimize" the basin by seeking to augment the Basin Optimization Yield, and ultimately the Sustainable Yield, to be no less than 40,000 AFY" (Judgment §4.9.1.2) by including "Basin Optimization Projects that are likely to be practical, reasonable, and cost-effective to implement prior to 2040 to maintain the Operating Yield at 40,000 AFY or as close thereto as achievable" (Judgment §5.3.2.1). Given that the Basin Optimization Yield and the Sustainable Yield are controlled by avoiding undesirable results, optimizing the yield would be accomplished by prioritizing the projects that have the greatest likelihood of avoiding undesirable results with the least cost. This means focusing on the two areas of the Basin where modeling has shown that undesirable results are likely under baseline conditions (i.e., eastern WLPMA and northern ELPMA). Prioritization of projects in those areas is necessary to optimize the Basin yield, but is not discussed in the BOP nor is it a consideration in the project scoring methodology. Item 14 of the project scoring methodology could be reworked to instead award more points for projects that address areas where modeling shows that undesirable results are likely under baseline conditions. Alternatively, a 15th criterion could be added. In either case, enough points should be awarded to prioritize projects that address areas where modeling shows that undesirable results are likely under baseline conditions. As an alternative to modifying or adding criteria, the projects could be divided into and presented in two groups within the BOP: (1) projects that address areas where modeling shows that undesirable results are likely under baseline conditions and (2) projects that may increase water supply, but not in areas where modeling shows that undesirable results are likely under baseline conditions (i.e. projects that add water in areas that would not increase the sustainable yield absent another project to move water or pumping).	The criteria in the Project Ranking Sheet have gone through PAC and TAC consultation and it would be inappropriate to make additional revisions without opportunity for additional review and comment. That said, evaluation of a project's impact on the two water-deficient areas of the basin has been added to the evaluation in text and consideration for inclusion in the BOP for implementation. The document has been revised to select specific projects for inclusion in the BOP.
BB-2	Bryan Bondy	Technical	Clarification	2	1.2, second bullet	*"Improve water quality management of the LPV;"*	This bullet should be preceded by "and/or" because not every project improves water quality management of LPV.	Added.
BB-3	Bryan Bondy	Technical	Project No. 1 Water Supply / Yield Augmentation Benefit	Various	Table 1; 2.2.1, 2.2.2.1, 2.2.1.2, 2.2.1.4	*Table 1: Water Supply / Yield Augmentation Up to 2,680 AFY ; Section 2.2.1: "If all of the Arundo within the 324-acre area is removed, this project could result in up to an additional 2,680 AFY of recharge to the ELPMA (VCWSD 2015). This project is anticipated to increase groundwater recharge to the ELPMA and improve the health of riparian habitat along Arroyo Simi-Las Posas." Section 2.2.1.1: "Implementation of this project could increase recharge to the ELPMA by as much as 2,680 AFY (VCWSD 2015)." Section 2.2.1.2: "While this project is not dependent on other unbuilt projects, the full benefits of this project may require implementation of other projects." Section 2.2.1.4: "The increased recharge will directly impact the water levels and groundwater in storage to provide increased flexibility in basin management to maintain groundwater levels above minimum thresholds and at the measurable objectives."*	The First Periodic Evaluation of the LPVB GSP concluded that increased flows in Arroyo-Simi Las Posas above recent (2016-2023 average rates) does not significantly increase the volume of recharge to ELPMA. Therefore, at present, the water supply / yield augmentation benefit of Project No. 1 should be expected to be insignificant if implemented as a standalone project. Achieving the stated water supply / yield augmentation benefit would be fully dependent on implementation of another project(s), such as the Moorpark Desalter. Even then, this project would not address the two areas where modeling shows that undesirable results are likely under baseline conditions (i.e., eastern WLPMA and northern ELPMA) unless coupled with another project to offset pumping in those areas. The cited text, per AF cost, schedule, and project scoring should be revised accordingly.	Projects were rescored based on their stand-alone benefits.
BB-4	Bryan Bondy	Technical	Project No. 2 Water Supply / Yield Augmentation Benefit	Various	Table 1; 2.2.2.1	*Table 1: Water Supply / Yield Augmentation 1,760 AFY ; Section 2.2.2.1: "In 2019, it was estimated that 1,762 AFY of CMWD water would be available for purchase and delivery to Zone MWC and VCWWD-19.."*	The water supply / yield augmentation value for this project should be based on the amount of in-lieu deliveries necessary to stabilize groundwater levels in eastern WLPMA, which may be less than the 1,760 AFY of available water assumed during GSP development. The minimum amount of in-lieu necessary to avoid minimum threshold exceedances in the WLPMA pumping depression should be estimated via analysis of the relationship between groundwater levels and groundwater extraction rates. The cited text, per AF cost, and project scoring should be revised accordingly based on this initial in-lieu estimate. The in-lieu estimate should then be confirmed with modeling during BOYS development.	The comment extends beyond the scope of the BOP, the contents of which are set forth in section 5.3 of the Judgment. The results of the Basin Optimization Yield study can be used to refine future analyses in advance of the next BOP and Basin Optimization Yield study. Further, this project does not require capital expense and can be regularly reevaluated and amount of water purchased adjusted, as needed.

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

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

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

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment	Comment Response
BB-9	Bryan Bondy	Clarification	Project No. 5 Water Supply / Yield Augmentation Benefit	Various	Table 1; Section 2.2.5.1	*Table 1: "Water Supply / Yield Augmentation Up to 4,700 AFY"; Section 2.2.5.1 "this project could increase the sustainable yield of the ELPMA by as much as 2,000 AFY"*	Conflicting values of water supply / yield augmentation are provided in the cited portions of the document. These should be reconciled.	Table and text have been revised to state that project implementation would prevent up to 2,200 AFY loss of sustainable yield.
BB-10	Bryan Bondy	Technical	Project No. 5 Water Supply / Yield Augmentation Benefit	Various	Table 1; Section 2.2.5; and Section 2.2.5.1	*Section 2.2.5.1 "this project could increase the sustainable yield of the ELPMA by as much as 2,000 AFY"*	Project No. 5 will not increase the sustainable yield of ELPMA. Rather, Project No. 5 will maintain existing recharge sources that are already accounted for in the sustainable yield. This should be made clear in the document.	The text has been revised.
BB-11	Bryan Bondy	Technical	Project No. 5 Water Supply / Yield Augmentation Benefit	12	Section 2.2.5.2	*Additionally, the full benefits of this project may require implementation of other projects, like the Moorpark Desalter (Project No. 4), which lowers groundwater elevations in the Shallow Alluvial Aquifer, and the Arundo Removal Project (Project No. 1), which reduces evapotranspiration losses upstream of the LPV.*	As mentioned in Comment No. BB-3, the First Periodic Evaluation of the LPVB GSP concluded that increased flows in Arroyo-Simi Las Posas above recent (2016-2023 average rates) does not significantly increase the volume of recharge to ELPMA. Therefore, even if Project No. 5 is coupled another project that lowers groundwater elevations in the Shallow Alluvial Aquifer, there is no additional discharge volume from Simi Valley to recharge in ELPMA (i.e., all of the available discharge is already percolating into the basin).	The text has been revised.
BB-12	Bryan Bondy	Technical	Project No. 5 Other Benefits	13	Section 2.2.5.4	*"Additionally, this project would maintain native habitat and provide flood control benefit."*	The habitat along the Arroyo Las Posas is not native. The habitat was recruited by and is maintained by discharges of non-native water (i.e., wastewater plants and dewatering wells). Air photos show that the "native habitat" before discharges on non-native water was a dry, sandy wash. It is unclear how maintaining flows in the arroyo provides a flood control benefit.	The text has been revised to: "Additionally, this project would maintain habitat that has developed since SVWQCP discharges upstream of the ELPMA resulted in perennial flow in Arroyo-Simi Las Posas."
BB-13	Bryan Bondy	Technical	Project No. 5 Other Benefits	13	Section 2.2.5.4	*"Consequently, the water quality of the surface water flows will have to be investigated further and addressed through project implementation."*	It is unclear what is meant here. Please elaborate and consider tying in with the Salts TMDL.	The text has been revised.
BB-14	Bryan Bondy	Technical	Project No. 6 Water Supply / Yield Augmentation Benefit	Various	Table 1; Section 2.2.6.1	*Table 1: "Water Supply / Yield Augmentation Up to 3,000 AFY"; Section 2.2.6.1 "In 2017, the City indicated that approximately 3,000 AFY of recycled water would be available for delivery to Berylwood Heights MWC and Zone MWC."*	The water supply / yield augmentation benefit of Project No. 6 is incorrect because diverting 3,000 AFY of recycled water from Simi Valley for pipeline delivery would reduce the amount water that percolates into ELPMA along the arroyo. The actual water supply benefit of Project No. 6 is equal to the amount of avoided evapotranspiration losses along the arroyo. The sustainable yield increase would depend on where the water is delivered, with maximal benefit for delivery to one or both areas of the Basin where modeling shows that undesirable results are likely under baseline conditions (i.e., eastern WLPMA and northern ELPMA) and minimal benefit elsewhere. The cited text, per AF costs, and project scoring should be revised accordingly.	The text has been revised to include a discussion of the per acre foot costs, to the extent that they are currently understood. The project scoring and Table 1 have been revised to reflect a project yield based on avoided ET losses.
BB-15	Bryan Bondy	Technical	Project No. 6 Cost per AF	15	Section 2.2.6.4	*"This does not include the cost to purchase and/or lease water from the City."*	It is unclear why the purchase cost is omitted. An estimate could easily be obtained by asking Simi Valley for the current recycled water purchase agreement.	The text has been revised to discuss the cost in the context of Project No. 5.
BB-16	Bryan Bondy	Technical	Project No. 7	15-16	Section 2.7	Entire section	It is unclear why a feasibility study is needed. This project is the same as Project No. 2, just in a different part of Basin. Existing infrastructure is capable of delivering imported water from Calleguas in-lieu to offset VCWWD-1 groundwater pumping and/or agricultural pumpers who have an agricultural meter through VCWWD-1. In-lieu delivery of water has been performed previously in this area under FCGMA rules, so it is known to be feasible. This section should be converted from a feasibility study to a project. The water supply / yield augmentation value for this project should be based on the minimum amount of in-lieu deliveries necessary to stabilize groundwater levels in northern ELPMA, which should be estimated via analysis of the relationship between historical groundwater levels and groundwater extraction and injection rates in the area. This would allow for a per AF cost and updated project scoring . The in-lieu estimate should then be confirmed with modeling during BOYS development.	VCWWD-1 was unable to provide estimate at this time of additional CMWD water it could take in lieu of pumping. In lieu deliveries for the prior program from 1995 through 2007 of 1,380 AFY has been added to Project 2 for BOYS modeling. The Project 7 feasibility study would utilize groundwater modeling to evaluate the volume and location of supplemental supplies needed to fully mitigate groundwater declines in the northern ELPMA, investigate sources of supplemental water, identify additional infrastructure or infrastructure upgrades needed to deliver supplemental water.
BB-17	Bryan Bondy	Technical	Project No. 10 Costs	21	2.2.10.3	*"The cost is anticipated to be approximately $140,000 for eleven well locations"*	The project cost is likely underestimated. Installation of sounding tubes in just a few wells that require pump removal and reinstallation could easily cost more than $140,000.	Projects 9 and 10 are not strictly Basin Optimization Projects per the Judgment and have been removed from the BOP in response to TAC comments and will be addressed in a separate technical memorandum.

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

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment	Comment Response
BB-18	Bryan Bondy	Technical	Project Prioritization	22-23	2.3	N/A	Please revise based on earlier comments.	Revised.
BB-19	Bryan Bondy	Technical	Project Prioritization - Project No. 7	22-23	2.3	N/A	Per comment BB-16, this project should be moved from Section 2.3.2 and Table 3 to Section 2.3.1 and Table 2.	See response to BB-16.
BB-20	Bryan Bondy	Consistency with Judgment	Applicability of Data Gap Projects to BOP	2	1.2, third bullet	*"Address data gaps identified in the GSP and 2025 Periodic Evaluation of the LPV GSP."*	Should projects to address data gaps be included in the BOP? Projects to address data gaps are not projects that "are likely to be practical, reasonable, and cost-effective to implement prior to 2040 to maintain the Operating Yield at 40,000 AFY or as close thereto as achievable" (Judgment §5.3.2.2).	See response to BB-17.
BB-21	Bryan Bondy	Editorial	Clarification	1	1.1, footnote no. 1		Because footnote no. 1 is the Judgement definition of the term Operating Yield (Judgment Section 1.73), greater clarity could be achieved by placing the footnote immediately following "Operating Yield" instead of the end of the sentence. Doing so would clarify that the footnote applies to the term "Operating Yield" not the quantity 40,000 AFY.	Footnote has been moved.
BB-22	Bryan Bondy	Editorial	Judgment Reference	1	1.1, bullet list		Regarding the bullet list, it would be helpful to reference the source Judgment section following each bullet (e.g., add "(Judgment §5.3.2.1)" after the first bullet, etc.).	Source section reference has been added.
BB-23	Bryan Bondy	Editorial	Project No. 1 Costs	6	2.2.1.3	*"...capital cost estimate for Phase II of $9,100,00"*	A zero is missing.	Zero has been added.
BB-24	Bryan Bondy	Editorial	Incomplete Sentence	11	Section 2.2.4.4	*"Depending on the operational conditions and distribution of desalted water, this project."*	Incomplete sentence.	Sentence has been deleted.
BB-25	Bryan Bondy	Editorial	Pagination	N/A	N/A	N/A	Page numbers reset to 1 after page 2.	Page numbers have been updated.
BB-26	Bryan Bondy	Clarification	Project Schedules	N/A	Appendix C	N/A	Consider a fourth color to more clearly distinguish between feasibility studies and project implementation or construction.	Appendix C schedule has been revised to include only the projects for inclusion in the BOP as well as for clarity.
BB-27		Clarification	Project Schedules	N/A	Appendix C	N/A	Some projects show no operation and maintenance phase after construction. Is that an error?	Project 1 is the only construction project in the schedule with O&M. Projects 2 and 5 show ongoing active project implementation, the remaining construction projects in the schedule are for feasibility studies.
BB-28	Bryan Bondy	Clarification	Project Schedules	N/A	Appendix C	N/A	Project No. 4 schedule seems aggressive.	The schedule in Appendix C was for a feasibility study, not project implementation. Projects not recommended for implementation have been removed from Appendices C & D.
BB-29	Bryan Bondy	Clarification	Project Schedules	N/A	Appendix C	N/A	Project No. 7 has no "Agency Activities" phase and would only be operated for one year (2027). This seems incorrect.	The project schedule is for a feasibility study, not implementation.
BB-30	Bryan Bondy	Editorial	Spelling	N/A	Appendix C & D	*"Phase II: Well Construction"*	Spelling "Construction"	Corrected.
BB-31	Bryan Bondy	Editorial	Executive Summary	N/A	N/A	N/A	Consider adding an executive summary.	Because the project evaluations and selection require significant detail, the document does not lend itself to an executive summary. However, the introduction has been expanded to assist the reader.
BB-32	Bryan Bondy	Editorial	Project Dependencies Graphic	N/A	N/A	N/A	Consider adding a graphic that visually communicates project interdependencies.	A table has been added to show project interdependencies.

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

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment	Comment Response
BA-1	Bob Abrams	Editorial		3	2.1	*e.g., 2.1.2 'Timing and feasibility e.g., "4. Project complexity (maximum of 5 points)" ""*	Although the scoring is self-explanatory in most cases, in the interests of clarity, the scoring could be made clearer in this summary for all numbered components. Or make the point in each subsection 2.1.1, 2.1.2, etc., that scoring is explained in detail in Appendix A. Reader hasn't read Appendix A by this stage.	Revised to reference Appendix A in each subsection.
BA-2	Bob Abrams	Technical		5	2.2.1.2	*"While this project is not dependent on other unbuilt projects, the full benefits of this project may require implementation of other projects, like the Moorpark Desalter (Project No. 4), that lower groundwater elevations in the Shallow Alluvial Aquifer to increase available storage in the ELPMA and limit discharge of the increased arroyo flows downstream into the Pleasant Valley Basin."*	This is one of the three projects recommended for inclusion in the BOYS. If its full benefits may not be realized without implementing Project 4, then Project 4 should elevated to a higher priority and included in the BOYS. Otherwise, it will not be known how much water this project might provide, which could lead to issues maintaining the 2040 the Operating Yield.	The Plan has been revised to evaluate Arundo removal as a stand-alone project and proceeding with this project is not recommended until a required companion project is implemented. Note that Project 4 is for a feasibility study, it is not sufficiently scoped and evaluated to include in BOYS modeling.
BA-3	Bob Abrams	Editorial		6	2.2.1.3	*"capital cost estimate for Phase II of $9,100,00"*	Commas in wrong place or missing a zero	Zero has been added.
BA-4	Bob Abrams	Technical		9	2.2.3.2	*"Additionally, while this project is not dependent on other unbuilt projects, the full benefits of this project may require implementation of other projects, like the Moorpark Desalter (Project No. 4), that lower groundwater elevations in the Shallow Alluvial Aquifer to provide adequate available storage to realize the full benefits of recharge to the ELPMA."*	While not one of the projects recommended for inclusion in the BOYS, its full benefits may not be realized without implementing Project 4. Thus, Project 4 should elevated to a higher priority and included in the BOYS. Otherwise, it will not be known how much water this project might provide, which could lead to issues maintaining the 2040 the Operating Yield.	Text and scoring has been revised to evaluate this project as a stand-alone project without significant benefit to the Basin without a companion project such as the Moorpark Desalter to increase available groundwater storage volume in the southern ELPMA.
BA-5	Bob Abrams	Editorial		11	2.2.4.4	*"(2) improve groundwater quality in the southern portion of the ELPMA, and (3) create additional underground storage within the ELPMA"*	Missing a period at the end of the sentence.	Period has been added.
BA-6	Bob Abrams	Editorial		11	2.2.4.4	*"Depending on the operational conditions and distribution of desalted water, this project."*	Should there be some text that follows the last word of the sentence?	Sentence has been deleted.
BA-7	Bob Abrams	General Technical		11	2.2.4.4	*"Additional Project Considerations"*	As noted for Projects 1, 3, and 5, The Moorpark Desalter may be a critical project for the success of other project. Thus, it should be given a higher priority and included in the BOYS.	Insufficient information was provided by VCWWD-1 to fully evaluate the Moorpark Desalter or include it in BOYS modeling. Projects 1 and 3 were re-scored as stand-alone projects and are not recommended for implementation at this time. Project 5 is not dependent upon the Moorpark Desalter project.
BA-8	Bob Abrams	Editorial		12	2.2.5.1	*"The 2025 Periodic Evaluation of the GSP evaluated the benefits of maintaining SVWQCP discharges"*	2025?	Changed to "first."
BA-9	Bob Abrams	Technical		12	2.2.5.2	*"Additionally, the full benefits of this project may require implementation of other projects, like the Moorpark Desalter (Project No. 4), which lowers groundwater elevations in the Shallow Alluvial Aquifer, and the Arundo Removal Project (Project No. 1), which reduces evapotranspiration losses upstream of the LPV.*	This is one of the three projects recommended for inclusion in the BOYS. If its full benefits may not be realized without implementing Project 4, then Project 4 should elevated to a higher priority and included in the BOYS. Otherwise, it will not be known how much water this project might provide, which could lead to issues maintaining the 2040 the Operating Yield.	Text referencing Project 4 has been removed. This project would maintain existing flow and recharge.
BA-10	Bob Abrams	General Technical		17	2.2.7.4		No text associated with this sub-heading? This sub-heading not included in previous or future sections? Describe Benefits of In Lieu Deliveries to Northern East Las Posas? Or delete? Benefits are described in the "Additional Project Considerations" subheading in previous and future Sections. But Tables 2 and 4 then have heading "Benefits relative to SGM". No preference, but need to be clear and consistent.	Sub heading has been deleted.
BA-11	Bob Abrams	Technical		17	2.2.8.1	*"The study will not provide a new water supply or directly increase the yield of the LPV."*	If rights are purchased/surrendered then there will be reduced groundwater production, so more water will remain in the ground? Or am I missing something?	Correct, the proposed project, if implemented, would be a demand-reduction program. Text has been revised and the range of demand reduction has been assumed to be >500 <2,500 AFY for scoring.
BA-12	Bob Abrams	General Technical		18	2.2.8.4		No text associated with this sub-heading? Describe Benefits of eveloping a Least Cost Acquisition Program? Or delete?	Sub heading has been deleted.

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

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment	Comment Response
BA-13	Bob Abrams	Technical		19	2.2.9	*"In addition, the GSP notes that there are limited dedicated monitoring wells screened in the Grimes Canyon aquifer in the ELPMA"*	Not just ELPMA. WLPMA too? Data are particularly sparse in WLPMA - e.g., wells not screened in GCA (or not monitored)	Projects 9 and 10 are not strictly Basin Optimization Projects per the Judgment and have been removed from the BOP in response to TAC comments and will be addressed in a separate technical memorandum.
BA-14	Bob Abrams	Technical		20	2.2.9.3	*"Because this project will not increase water supplies within the LPV, FCGMA has assigned the total water costs to implement this project a value of ">$3,000 per AF"."*	The costs to LPVB could be much higher if there are insufficient data in certain areas and aquifers and permanent undesirable results occur without anyone's knowledge. Suggest this analysis is reconsidered.	See response to BA-13.
BA-15	Bob Abrams	Technical		22	Table 2	*Projects that are "Recommended for Inclusion in the BOY"*	Given BA-2, BA-4, BA-7, and BA-9, the Moorpark Desalter (Project 4) should be included in the BOYS.	See response to BA-7.
BA-16	Bob Abrams			23	Table 3	*Scores for Project 4*	Given BA-2, BA-4, BA-7, and BA-9, the Moorpark Desalter (Project 4) should be included in the BOYS.	See response to BA-7.
BA-17	Bob Abrams	Technical		23	Table 3	*Scores for Project 8*	See BA-7. Suggest either "Water Supply Benefit" (reduction in demand?) or "Benefits relative to SGM" (benefit to 3 or more indicators?) scores revisited. Depending on lifetime of acquisition I would like to see this project in the BOY	Project 8 has been rescored, however, the policies, costing mechanisms, and funding allocated, need to be developed in Project 8 to provide reasonable quantification of the program for BOYS modeling.
BA-18	Bob Abrams	Technical		23	Table 3	*Scores for Project 9*	Cost score 3? See above BA-10 - Monitoring wells are relatively cheap and the costs to LPVB could be much higher if there are insufficient data in certain areas and aquifers that leads to permanent undesirable results occur without anyone's knowledge. Suggest this score is reconsidered (undesirable result costs avoided?). "Benefits relative to SGM" score 5 for groundwater monitoring well data. Without data, SGM cannot be demonstrated? Suggest this score is reconsidered (benefit to 3 or more indicators?). I would like to see this project in the BOY	See response to BA-13.
BA-19	Bob Abrams	Technical		B-1	Project 8	*Reduced Demand <500 AFY*	Is this realistic? Could it be a lot more? What is it based on?	Project 8 has been rescored with an assumed range of >500 <2,500 AFY. The actual amount will depend on the funding allocated from Basin Assessment, the cost of allocation purchase, and the willingness of Water Right Holders to sell.
BA-20	Bob Abrams	Technical		B-2	Project 8	*Project Lifespan <5 years*	Surely if the water right has been purchased, that is in perpetuity? >20 years?	The program has an indefinite lifespan and scoring has been revised accordingly. Agreed that purchase of Allocation Basis would be in perpetuity, however, Annual Allocation and Carryover purchases would be for a given water year.
BA-21	Bob Abrams	Technical		B-2	Project 9	*Development Phase Conceptual - no feasibility or design, project not well defined*	The approximate location and depth for new wells already known? Well specification easily defined.	See response to BA-13.
BA-22	Bob Abrams	Technical		B-3	Project 8	*Impacts on Sustainability Indicators 10*	Could be 20 if demand reduced?	Program implementation may help address chronic lowering of groundwater levels and decreases in groundwater in storage. Scoring revised to 15 points for addressing two sustainability indicators.
BA-23	Bob Abrams	Technical		B-3	Project 9	*Water cost >$3000/AF*	I suggest the cost of damage avoided or avoiding water resource potentially lost offsets this, so the data are more valuable <$500/AF?	See response to BA-13.
BA-24	Bob Abrams	Technical		B-3	Project 9	*Impacts on Sustainability Indicators 10*	Could be 20 if it demonstrates SGM?	See response to BA-13.
BA-25	Bob Abrams	Technical		B-11	Project 8	*Project Lifespan <5 years*	Surely if the water right has been purchased, that is in perpetuity? >20 years?	See response to BA-20.
BA-26	Bob Abrams	Technical		B-11	Project 8	*Additional benefits, Indicators' - mitigate one*	Could be 20 if demand reduced?	See response to BA-22.
BA-27	Bob Abrams	Technical		B-12	Project 9	*Conceptual' - no feasibility or design, project not well defined*	The approximate location and depth for new wells already known? Well specification easily defined.	See response to BA-13.
BA-28	Bob Abrams	Technical		B-12	Project 9	*Water Cost,' >$3000/AF*	I suggest the cost of damage avoided or avoiding water potentially lost offsets this, so the data are more valuable <$500/AF?	See response to BA-13.

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

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment	Comment Response
BA-29	Bob Abrams	Technical			Appendix C		This assumes all projects will be done. This will need sufficient resourcing – does FCGMA have this ready? Is it a schedule that just shows it could be done, or is it a proposed schedule that FCGMA would follow?	The document has been revised to select projects for inclusion in the BOP for implementation. Appendices C & D have been revised to include only those projects selected for implementation. It should be noted that the BOP is a plan subject to Watermaster Board approval; budgeting and assessments to fund projects will need to go through Board process with committee consultation.
BA-30	Bob Abrams	Technical			Appendix C		Why does Phase I: Work Plan Development for Project 1 Arundo removal take 23 months?	The scope includes developing an RFP to engage a consultant; updated vegetation mapping and quantification including field surveys; identification and securing access agreements with landowners; development of a reed removal workplan and restoration plan; acquisition of environmental permits and compliance coordination. These activities are projected to require 24 months.
BA-31	Bob Abrams	Technical			Appendix C		Why is Project 7 In Lieu Deliveries to Northern ELPMA not looked at until 2027?	Project 7 start date moved earlier.
BA-32	Bob Abrams	Technical		D-2 and D-3	Project 9		Is the cost $550,000 for six quarters correct - $3.3M? So six new wells? Not explicit in Section 2.2.9. Seems expensive	See response to BA-13.
BA-33	Bob Abrams	Technical					I note for the record that only two of the nine proposed projects discuss the West Las Posas Management Area (WLPMA).	It is correct that only 2 of the 8 implementation projects (2 and 8)address the WLPMA. The two data-gap projects (9 and 10) also address the WLPMA.

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

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment	Comment Response
TM-1	TMorgan	General Editorial	plan scope	NA	NA	*NA*	The document reads like a list of projects rather than a plan. Document does not say WHAT is going to be done. What modeling will be done? Have scenarios been developed to model? How will out-of-basin impacts be addressed? Can a project flow chart be included to show the sequencing of steps envisioned for the plan? Which projects will be modeled? If the goal is get Operational Yield to 40,000 AFY, what quantity of water is needed to be developed via new sources, demand reduction, new projects, or ??	The BOP provides the analysis and details by which the Watermaster Board can make determinations, with committee consultation, on which projects to fund. The majority of the proposed projects have insufficient information to develop full implementation details and require full feasibility studies which is beyond the scope of the BOP.
TM-2	TMorgan	General Editorial	plan scope	NA	NA	*NA*	How do the prioritized projects address the GW problems in each basin? Same for the "Feasibilty Study" group of projects. The link between solving basin issues and these projects is not clearly laid out. Maybe a matrix showing which projects address each problem would focus this discussion.	Evaluation of a project's impact on the two water-deficient areas of the basin has been added to the evaluation in text and consideration for inclusion in the BOP for implementation. The document has been revised to select specific projects for inclusion in the BOP.
TM-3	TMorgan	General Technical	plan scope	NA	NA	*NA*	Expected to see a discussion of how this plan would go about identifying possible funding mechanisms for all of the projects. Reader is left wondering how these projects would be paid for. Who would be responsible for the study and implementation costs.	Text has been revised to discuss source of funding. Most projects would need to be funded by Basin Assessment. Of course, WM staff are continuously monitoring for potential grant funding that may come available.
TM-4	TMorgan	Technical	project benefits	NA	NA	*NA*	Are the projects dependent on the Moorpark Desalter to create more storage space in the shallow aquifer actually competing for the same storage space? Until the desalter project is modeled and the amount of storage space is reasonably estimated, we don't know if multiple projects with the same benefit (i.e., creation of surface water flows that can be captured by the storage space) are actually viable.	Interdependent projects have been revaluated on their own merits as standalone projects. A table has been added to show the interdependencies and the differences in estimated benefits of standalone versus multiple-project implementation.
TM-5	TMorgan	Editorial	language clarification	2	2.1.2	*...uncertainty of the project...*	Clarify what uncertainty is being referenced. Is it project feasibility, benefit(s) to basin, or ? Feels like words are missing from sentence.	The second portion of the sentence clarifies the uncertainty "...and evaluates the likelihood of a project's ability to be implemented and operation prior to 2040." Further, reference to the Project Ranking Sheet in Appendix A has been added to the end of the section.
TM-6	TMorgan	Editorial	language clarification	3	2.1.3	*9. Funding match for project construction...*	A more precise wording would be "Is the project proponent willing to provide a funding match". This change makes the language more consistent with Appendix A Ranking Sheets.	Revised.
TM-7	TMorgan	Editorial	language clarification	3	2.1.3	*10. Funding match for O&M*	A more precise wording would be "Is there a source other than FCGMA for ongoing operations and maintenance cost". Why not match the ranking sheet language? .	Revised.
TM-8	TMorgan	Technical	language clarification	5	2.2.1.2	*...the full benefits of this project may require implementation of other projects, like the Moorpark Desalter (Project No. 4), that lower groundwater elevations in the Shallow Alluvial Aquifer to increase available storage in the ELPMA and limit discharge of the increased arroyo flows downstream...*	The interdependencies between projects are not emphaszed adequately in the document. The benefits of this project are not fully realized unless the Moorpark Desalter project is implemented, but the desalter project is not among the prioritized projects and is not proposed for inclusion in the BOYS (Table 3). Does this mean that Arundo removal should be contingent on the desalter project? How would the modeling be performed to show the benefits of the Arundo removal without also including the desalter project?	The Plan has been revised to evaluate Arundo removal as a stand-alone project and proceeding with this project is not recommended until a required companion project is implemented.
TM-9	TMorgan	Technical	project costs	5	2.2.1.3	*...an O&M cost of $250 per acre-foot (AF) of water. ...the total cost to implement this project is estimated to be approximately $390 per AF.*	Based on the values presented in this section and Appendix D, Phase I Planning cost is $400,000, Phase II Arundo removal (CAPEX) is $9,100,000 with Phase III (?) (OPEX) at $670,000/qtr ($2,680,000/yr). Total project cost is $400K+$9,100K+(25yrs at $2,680K/yr)=$76,500K or ~$1,142/AF ($76,500K/(25yrs*2,680AF/yr)) as a long-term 25 yr average).	Annual O&M costs in Appendix D were incorrectly listed as quarterly cost. Total capital cost is $9,100K + $400K which is $380K per year over 25 years. Annual O&M costs are $670K. Total cost is $380K + $670K / 2,680 = $392/AF.
TM-10	TMorgan	Technical	project costs	5	2.2.1.3	*...an O&M cost of $250 per acre-foot (AF) of water.*	This value presumably comes from 2,680AFY*$250/AF=$670,000/yr. Appendix D indicates that the O&M costs are $670,000/qtr (which is $2,680,000/yr) or $1,000/AF.	Annual O&M costs are estimated at $670,000, this was incorrectly listed as quarterly costs. Appendix D has been corrected.

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

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment	Comment Response
TM-11	TMorgan	Technical	language clarification	6	2.2.1.4	*...increased flexibility in basin management to maintain groundwater levels above minimum thresholds and at the measurable objectives.*	This sentence implies that GW levels are currently above the MTs and are actually at the MOs without the project. Is this project needed to achieve MTs and MOs in ELPMA?	Text has been revised to explain that annual extractions have averaged 2,600 AFY more than the sustainable yield of the ELPMA. Additionally, text was revised to state that the project would not be expected to benefit the northern portion of the ELPMA.
TM-12	TMorgan	Technical	project description	20	2.2.10	*...installation of transducers in representative monitoring points, or key wells,...*	How does this project fit into the optimization goal of achieving and maintaining the Operational Yield at 40,000 AFY? The project obviously has benefits to refining our understanding of the basin hydrogeology, but this plan is focussed on the 40,000 AFY Operational Yield. What is the connection between more WL data and achieving and maintaining the desired yield?	Projects 9 and 10 are not strictly Basin Optimization Projects per the Judgment and have been removed from the BOP in response to TAC comments and will be addressed in a separate technical memorandum.
TM-13	TMorgan	Technical	project costs	21	2.2.10.3	*...cost is anticipated to be approximately $140,000 for eleven well locations...*	The $140K cost is just the CAPEX. Transducer networks require ongoing maintenance, field verification, instrumental drift evaluations, periodic equipment replacement, and analyses of the newly acquired data. These OPEX expenses should be a part of the cost evaluation.	See response to TM-12.
TM-14	TMorgan	Technical	project costs	7	2.2.2.3	*...by funding the difference between the cost of CMWD and the cost of pumping.*	Is part of the incentivization program to allow Zone MWC and VCWWD-19 to carry over their unused GW allocation? OR is that allocation forfeited ? This section does not discuss how the project would be funded except in general terms (i.e., incentivization). Expected this section to indicate that an "incentivization plan" would be developed by end of 2025 (for example).	The project text has been revised for two phases. The first phase will be development of program policy and incentive amount by the WM Board. Text has been revised to state project would be funded by Basin Assessment.
TM-15	TMorgan	Technical	project costs	7	2.2.2.3	*...CMWD's 2024 Tier 1 water rate is $1,730 per AF.*	It would be appropriate to include a brief acknowledgement that the Tier 1 rates are expected to increase in the future. Consequently, the per AF costs for this project will increase by a yet to be determined amount in the future.	Text revised.
TM-16	TMorgan	Editorial	recognition of stakeholder input	8	2.2.2.4	*...coordination between FCGMA, CMWD, VCWWD-19, and Zone MWC.*	add "and basin stakeholders" to this list.	Project associated policies and funding through basin assessments will be developed through WM Board process including water right holders engagement, principally through PAC consultation.
TM-17	TMorgan	Technical	Undesirable Results	8	2.2.2.4	*Implementation of this project is not anticipated to cause Undesirable Results...*	The project is not expected to cause Undesirable Results, but is it expected to mitigate a Significant and Unreasonable Impact(s)?	Text revised.
TM-18	TMorgan	Technical	downstream impacts	8	2.2.3.1	*...this project could provide up to 2,000 AFY of diversions to their percolation ponds...*	Has the impact of the loss of 2,000 AFY of water to the Pleasant Valley basin been evaluated? How will this be handled during the modeling effort since use of the OPV model is not a part of this study plan?	Potential impacts of the project would need to be evaluated in feasibility and CEQA/NEPA studies. This project will not be included in BOYS modeling.
TM-19	TMorgan	General Editorial	project timing	8	2.2.3.2	*...construction of the diversion facilities could be completed in a single phase by June 30, 2027.*	This is a very aggressive project schedule considering permitting and CEQA/NEPA has not yet been started. Appendix D shows construction extending through Q3 2027.	The timeline was provided by VCWWD-1, the project proponent. We agree it is optimistic. However, this project is not recommended for consideration of implementation in the revised BOP unless and until a companion project to lower groundwater levels in the area is implemented.
TM-20	TMorgan	Technical	language clarification	9	2.2.3.2	*...the full benefits of this project may require implementation of other projects, like the Moorpark Desalter (Project No. 4), that lower groundwater elevations in the Shallow Alluvial Aquifer to provide adequate available storage to realize the full benefits of recharge to the ELPMA.*	The interdependencies between projects are not emphaszed adequately in the document. The benefits of this project are not fully realized unless the Moorpark Desalter project is implemented, but the desalter project is not among the prioritized projects and is not proposed for inclusion in the BOYS (Table 3). Does this mean that stormwater capture should be contingent on the desalter project? How would the modeling be performed to show the benefits of the stormwater capture without also including the desalter project?	Text and scoring has been revised to evaluate this project as a stand-alone project without significant benefit to the Basin without a companion project such as the Moorpark Desalter to increase available groundwater storage volume in the southern ELPMA. his project will not be included in BOYS modeling.
TM-21	TMorgan	Technical	project costs	9	2.2.3.3	*No outside sources of funding to construct this project have been identified.*	Is the implication that VCWWD-1 will bear the full costs of this $4,000,000 (CAPEX) project? The funding element is not discussed. Will pumpers in the basin be expected to cover the CAPEX and OPEX costs since no outside funding sources have been identified?	Text has been revised to note that no funding sources to construct this project have been identified by VCWWD-1 other than potential federal or state grants or loans.

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

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment	Comment Response
TM-22	TMorgan	Technical	collaboration required	9	2.2.3.4	*...this project will require coordination between FCGMA and VCWWD-1.*	Coordination/collaboration needed from CDFW, RWQCB, and ACOE. Suggest adding these agencies to the sentence.	CDFW, RWQCB, and ACOE, are permitting agencies and are identified under "Environmental and Permitting."
TM-23	TMorgan	Technical	possible interbasin impacts	9	2.2.3.4	*Implementation of this project is not anticipated to cause Undesirable Results...*	What is the impact to Pleasant Valley basin? Might this loss of water be perceived as a triggering event for Undesirable Result(s)? How will this be evaluated in the BOYS?	Potential impacts of the project would need to be evaluated in feasibility and CEQA/NEPA studies. This project will not be included in BOYS modeling.
TM-24	TMorgan	Technical	language clarification	9	2.2.3.4	*...this project would aid in maintaining groundwater elevations above the minimum thresholds throughout the ELPMA.*	This sentence implies that GW levels are currently above the MTs without the project. Is this project needed to achieve MTs in ELPMA?	Text revised to indicate that project would not be expected to benefit the northern portion of the ELPMA.
TM-25	TMorgan	Technical	project water balance	10	2.2.4	*...groundwater flow modeling study suggests that pumping 6,270 AFY for the desalter project would result in an additional 2,200 AFY of recharge to the ELPMA.*	2,200AFY of enhanced surface water recharge is partiallly offset by the exported brine ~1,568AFY (assumed 25% of 6,270AFY) = 632AFY. The net benefit appears to be much less that 2,200 AFY of additional recharge.	Text has been revised to reflect potential negative impact to ELPMA water supplies as the difference between VCWWD-1's "likely request" for an additional 5,000 AFY of allocation and the additional 2,200 AFY of potential recharge, or -2,800 AFY. Project scoring has been revised.
TM-26	TMorgan	Technical	project benefits	10	2.2.4.1	*... it is estimated that this project would increase the sustainable yield of the ELPMA by 2,200 AFY.*	This is not clear to the reader. Pumping 6,270 AFY equates to an increase in the sustainable yield by 2,200 AFY?	See response to TM-25.
TM-27	TMorgan	Technical	project assumption	10	2.2.4.2	*"This project is not dependent on other unbuilt projects or projects that are currently under construction."*	The SMP does not extend to desalter location. This project is dependent on an SMP extension to the desalter location (or some other brine disposal option).	Text has been revised.
TM-28	TMorgan	Technical	project assumption	10	2.2.4.2	*VCWWD-1 has not completed a feasibility study for this project.*	This language is not consistent with 2.2.4 and 2.2.4.1 that references preliminary GW modeling and preliminary analyses...have been completed...	Text has been clarified to state that "other than preliminary groundwater modeling conducted in 2016, VCWWD-1 has not completed a full feasibility study for this project."
TM-29	TMorgan	Technical	project costs	11	2.2.4.3	*No outside sources of funding to construct this project have been identified.*	Is the project proponent suggesting it bear the full costs of this $40,000,000 (CAPEX) project? The funding element is not discussed. Will pumpers in the basin be expected to cover the CAPEX and OPEX costs since no outside funding sources have been identified?	VCWWD-1 has not fully identified the costs including O&M nor have they identified a source for the funding.
TM-30	TMorgan	General Editorial	incomplete sentence	11	2.2.4.4	*...distribution of desalted water, this project.*	incompete sentence...missing words after "...this project."	Revised.
TM-31	TMorgan	Technical	project benefits	12	2.2.5.1	*...implementation of this project could increase the sustainable yield of the ELPMA by as much as 2,000 AFY.*	How does securing this water flow into the future increase the sustainable yield? This flow is happening now, so this input was used to calculate the current sustainable yield. Isn't the idea behind this project to secure this water source into the future?	Text revised to clarify that this project would maintain existing flows.
TM-32	TMorgan	Technical	project premise	13	2.2.5.4	*...perennial surface water flow in Arroyo Simi-Las Posas is also thought to be the primary source of high TDS concentrations observed in the groundwater in the southern ELPMA (FCGMA 2019). Consequently, the water quality of the surface water flows will have to be investigated further and addressed through project implementation.*	This statement says that we don't know if the water quality of the surface water flows would actually support the project contentions that high TDS GW originated from the surface water AND it is "unknown" if the future water quality would be sufficiently better that the GW quality would improve enough to justify the project costs. Feels like the basic premise of the project is suspect if the water quality must be studied further and possibly addressed by adaptive management.	Text has been clarified.
TM-33	TMorgan	Technical	project benefits	13	2.2.5.4	*...and provide flood control benefit.*	This is the first mention of flood control benefits. How does this benefit fit into the optimization goal of achieving and maintaining the Operational Yield at 40,000 AFY?	Reference to flood control benefit was removed.
TM-34	TMorgan	Technical	project impacts	14	2.2.6.1	*...the City indicated that approximately 3,000 AFY of recycled water would be available...*	What is the impact to the Simi Valley basin of exporting 3,000 AFY of recycled water? How will this plan evaluate this potential impact? This is an in-lieu project...substituting imported recycled water for GW extractions.	Potential impacts of the project would need to be evaluated through the proposed feasibility study. Text has been revised.
TM-35	TMorgan	Technical	project impacts	14	2.2.6.2	*Project benefits.*	Suggest saying "Project benefits and impacts"	Revised.

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

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment	Comment Response
TM-36	TMorgan	Technical	project costs	15	2.2.6.3	*...does not include any costs required to construct, operate, and maintain local desalters to treat the recycled water...*	Suggest adding text to acknowledge that these costs do not include the costs of brine disposal from the desalters which could include a brine pumping station and conveyance pipeline. Is the brine envisioned to be disposed of in the SMP? If the SMP is the disposal mechanism, then the costs do not include the connection fees (and construction costs to make the connection) or the ongoing unit disposal costs. The costs for this project are much greater than $700/AF.	Project 6 is for a proposed feasibility study, which would identify all potential costs. Text indicates that operational costs of desalters was not included in the per AF estimate. The estimate was revised per the 2017 study to approximately $1,200 per AF.
TM-37	TMorgan	General Technical	agency collaboration	15	2.2.6.4	*...will require coordination between FCGMA, the City, and Las Posas Valley Users*	Suggest adding RWQCB to the list.	Revised.
TM-38	TMorgan	Technical	project impacts	15	2.2.6.4	*...water level recovery benefits would be quantified through numerical modeling conducted in the Phase I Feasibility Study.*	Section 2.2.6.2 does not include GW modeling in the Phase I Feasibility activities. What GW model would be used to assess the impact to Simi Valley basin of this water export to the LPV basin?	Potential benefits and impacts to the ELPMA would be evaluated with the existing groundwater model. Groundwater modeling would not be used to evaluate potential impacts to the Simi Valley basin in the feasibility study.
TM-39	TMorgan	Technical	project description	15	2.2.7	*...evaluate the feasibility of providing supplemental water supplies...*	It would be helpful to the reader to know the potential source(s) of supplemental water that are proposed to be evaluated. This information could also be included in Section 2.2.7.1.	Text revised to state that the feasibility study will investigate sources of supplemental water.
TM-40	TMorgan	Editorial	grammar / editorial	16	2.2.7.1	*...willing to use...*	willingness to use	Revised
TM-41	TMorgan	Technical	project concept	16	2.2.7.1	*...will not provide a new source of water supply to the LPV...*	Reader is left wondering what this project does... if it doesn't supply new water to the area, is it a demand reduction project? Section 2.2.7 indicated "Supplemental water supplies to this area will reduce groundwater demand in this part of the ELPMA."	Statement was intended to inform reader that the proposed project is a feasibility study, not the project itself. Text has been revised for clarity.
TM-42	TMorgan	Editorial	document organization	17	2.2.7.4		No text is provided under this heading. If there are no benefits, suggest making that statement.	Text completed in this section.
TM-43	TMorgan	Technical	project description	17	2.2.7.5	*...identify entities that are able to receive and deliver supplemental water...*	Suggest including the potential supplies of the supplemental water in this sentence. ...identify entities that are able supply or receive and deliver supplemental water...	Revised.
TM-44	TMorgan	Editorial	document organization	18	2.2.8.4		No text is provided under this heading. If there are no benefits, suggest making that statement.	Text has been completed in this section.
TM-45	TMorgan	Technical	entity collaboration	18	2.2.8.5	*...will require coordination between FCGMA and the PAC and TAC...*	Add "basin stakeholders" to this sentence.	Basin stakeholder participation is via the PAC and TAC.
TM-46	TMorgan	Technical	project costs	22	2.3.1	*...sufficiently defined to implement without additional feasibility studies to define project scopes, costs, and benefits.*	Many of the projects do not have defined costs for both CAPEX and OPEX. OPEX, for several projects, is poorly assessed or not assessed at all. The interdependencies of some projects with others (to achieve the stated anticipated benefits) means that the actual costs for some projects are not stand alone values and should be viewed in conjunction with the interdependent project costs.	Projects were rescored based on their standalone benefits without the dependent project(s). Based on this evaluation, projects were selected for inclusion in the BOP for implementation. Projects that are feasibility studies will provide better estimates of capital and O&M costs for implementation.
TM-47	TMorgan	Technical	project costs	24	4	*...the total estimated project cost...*	The total estimated project costs have yet to be determined, in particular the OPEX costs. It would be more accurate to identify the project costs as partial, interim cost estimates.	Text has been revised. We note that costs were caveated in the final sentence of this paragraph.
TM-48	TMorgan	Editorial	document organization	B-2	Appendix B	*NA*	The Timing/Feasibility matrix has many cells where the words are cutoff (the text is not scaled to the cell size).	Revised to display all text.
TM-49	TMorgan	Editorial	document organization	B-3	Appendix B	*NA*	As mentioned previously, the Water Cost values (under Cost & Funding) are likely underestimated. The uncertainty of these costs is not discussed in the ranking scheme section. The uncertainty (and TBD costs) could impact the ranking of some of the projects. How can this uncertainty be addressed in the plan?	Text has been revised to address cost uncertainty.
TM-50	TMorgan	Editorial	document organization	D-1	Appendix D	*Phase II: Well Construstion*	typo under Project 9 - Construction. This continues across each matrix in this Appendix.	See response to TM-12.
TM-51	TMorgan	Editorial	document organization	D-1	Appendix D	*NA*	the Notes have odd fonts - readable, but odd	Noted. Font is consistent throughout appendix.

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

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment	Comment Response
TM-52	TMorgan	Editorial	document organization	D-2 through D-6	Appendix D	*NA*	the Notes text is truncated	Revised to display all text.
TM-53	TMorgan	Technical	document organization	D-6	Appendix D	*NA*	It would be more helpful to the reader if the Total Project Costs column supplemented with CAPEX, OPEX, and WM administrative cost columns. For many projects, the OPEX is not known and having a "TBD" shown in the table makes it clear to the stakeholders that these project costs should be considered minimums. The WM administrative costs could be estimated as a generic 20% of the CAPEX (e.g., with an upper limit of ~$200K) plus 20% of the OPEX costs. It is understood that these are placeholder costs, but is a more complete representation of the types (and general orders of magnitude) of the overall project costs.	The Budget in Appendix D has been revised to provide clearer presentation of capital and O&M costs. Footnotes have been added regarding uncertainty. Placeholder WM admin costs have been added; projected costs will be estimated during the first phase of each implementation project or during the study for feasibility study projects.

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

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment	Comment Response
CT-1	Chad Taylor	General Technical	Add cost per unit water to each text Cost and Funding subsection	NA	NA	*NA*	Consider presenting costs per acre-foot of water supply for each project in the text for comparison to the project ranking sheets in Appendix B.	Estimated cost per AF from Appendix B added to Cost and Funding section for each project.
CT-2	Chad Taylor	General Editorial	Adjust cell sizes in Appendix B tables so all text is visible	B-2 & B-7	Appendix B	*NA*	The text in some Appendix B tables is not visible in the pdf that was provided because the cell sizes in the table are too small to show all of the text. Please adjust so all text is visible and legible.	Revised to display all text.
CT-3	Chad Taylor	Editorial	Project 1 Phase II cost value appears to be missing a 0	6	2.2.1.3, second paragraph	*Adjusting The Nature Conservancy's cost estimates by the increase in Consumer Price Index (CPI) between 2020 and 2024 leads to a capital cost estimate for Phase II of $9,100,00 and an O&M cost of $250 per acre-foot (AF) of water.*	The referenced cost of $9,100,00 is either missing a zero or the commas are misplaced. Based on the stated unit price of water supply it appears that a zero is missing.	Zero has been added.
CT-4	Chad Taylor	Editorial	Check date ranges in Project 2	7 & 8	2.2.2.2 & 2.2.2.4	*NA*	In the first paragraph of section 2.2.2.2 the historical program is referenced to have been active between 1995 and 2008, then in the third paragraph the range is 1998 to 2005 and the first paragraph of 2.2.2.4 references 1995 to 2008 again.	Corrected to reference 1995 to 2008 program years in all paragraphs.
CT-5	Chad Taylor	Editorial	Explain costs for Project 2	7	2.2.2.3	*The cost to implement this project is driven by CMWD's water rates. CMWD's 2024 Tier 1 water rate is $1,730 per AF. This cost includes O&M to maintain CMWD's conveyance infrastructure. The project is envisioned to incentivize VCWWD-19 and Zone MWC by funding the difference between the cost of CMWD and the cost of pumping.*	Please provide an estimate of what the incentive cost offset might be.	The cost offset is not presently known and would need to be determined as part of project development.
CT-6	Chad Taylor	Technical / Editorial	Explain rationale for water supply estimte for Project 4	10	2.2.4.1	*VCWWD-1 has conducted preliminary numerical groundwater flow modeling to evaluate project feasibility. Their groundwater flow modeling study suggests that pumping 6,270 AFY for the desalter project would result in an additional 2,200 AFY of recharge to the ELPMA. Based on this, it is estimated that this project would increase the sustainable yield of the ELPMA by 2,200 AFY. Additional modeling is required to evaluate the effects of the proposed desalter under scenarios that are consistent with those evaluated in the GSP and Basin Optimization Yield study.*	Please explain how pumping 6,720 AFY of water to effect 2,200 AFY of recharge results in a sustainable yeild increase of 2,200 AFY. Does this mean that total recharge would equal 8,920 AFY because the 2,200 AFY is truly additional recharge? Readers are likely to see an extraction of 6,720 AFY less recharge of 2,200 AFY and assume that sums to a loss of 4,520 AFY.	Text has been revised to reflect potential negative impact to ELPMA water supplies as the difference between VCWWD-1's "likely request" for an additional 5,000 AFY of allocation and the additional 2,200 AFY of potential recharge, or -2,800 AFY. Project scoring has been revised.
CT-7	Chad Taylor	Editorial	Missing text	11	2.2.4.4, end of second paragraph	*Depending on the operational conditions and distribution of desalted water, this project.*	This sentence appears to be missing text	Sentence has been deleted.
CT-8	Chad Taylor	Technical	Water quality impacts from Project 5	13	2.2.5.4	*While implementation of this project is anticipated to support groundwater level and storage management within the ELPMA, perennial surface water flow in Arroyo Simi-Las Posas is also thought to be the primary source of high TDS concentrations observed in the groundwater in the southern ELPMA (FCGMA 2019). Consequently, the water quality of the surface water flows will have to be investigated further and addressed through project implementation.*	The potential for water quality impacts to groundwater resulting from this project are concerning, especially as Project 4 is intended to address a similar existing issue stemming from the same water source as the one identified for Project 5.	Comment noted.
CT-9	Chad Taylor	Technical	Recycled water desalter costs for individual recipients	14 - 15	2.2.6.2 & 2.2.6.3	*Additionally, recipients of the recycled water may be required to construct, operate, and maintain desalter facilities to reduce constituent concentrations to levels suitable for irrigation and to ensure that long-term use of this water does not result in a significant and unreasonable degradation of water quality in the LPV.*	Does the cost estimate in section 2.2.6.3 include the costs to individual recycled water recipients for construction, operation, and maintenance of desalter facilities to use recycled water? If not, what are those estimated costs and who would bear them?	The cost estimate in section 2.2.6.3 is based on a 2017 study. Project costs would need to be fully evaluated in the Phase I feasibility study. No matching funds have been identified and both capital and O&M costs would need to be funded through Basin Assessment. Text has been revised accordingly.
CT-10	Chad Taylor	Editorial	Section title and and content disagreement	20-Jan	2.2.10.1	*NA*	The title of this section is "Water Supply" but the text referes to timing and appears to be misplaced as nearly identical text is in the next section.	Text has been revised.
CT-11	Chad Taylor	Editorial	Time agreement	20 & 21	2.2.10.1 & 2.2.10.2	*NA*	In section 2.2.10.1 a 1 year period is referenced for transducer installation and in 2.2.10.2 it is a 2 year period. Assume section 2.2.10.1 text is all misplaced, but if not please make this consistent or explain why it is not	Projects 9 and 10 are not strictly Basin Optimization Projects per the Judgment and have been removed from the BOP in response to TAC comments and will be addressed in a separate technical memorandum.

LAS POSAS VALLEY TECHNICAL ADVISORY COMMITTEE

February 11, 2025

RECOMMENDATION REPORT

To: Las Posas Valley Watermaster

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

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

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

TAC RECOMMENDATIONS

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

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

1.1 Recommendations:

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

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

1.2 Technical Rationale for Recommendation:

Sustainability in the LPVB is not solely a function of the basin-wide water budget. Increasing potential inflow to the basin-wide water budget in areas where current and historical conditions do not require augmentation does not directly address conditions in areas where undesirable results are occurring or are predicted to occur. This potential misalignment of effort is compounded when the problems exist in areas of the LPVB that are either poorly connected to or disconnected from the areas of augmentation. In those cases the problem areas will either have limited or no benefit from the augmentation projects.

1.3 Summary of Facts in Support of Recommendation:

- Only one of the highly ranked projects has the potential to directly affect the areas of undesirable results in the eastern West Las Posas Management Area (WLPMA).
- The sole project designed to address conditions in the northern East Las Posas Management Area (ELPMA) is poorly ranked.
- Many of the projects propose to augment water available for recharge in areas of the LPVB with high groundwater levels, limiting the volume of additional recharge that could occur.
- Optimization should include iterative evaluation of projects at different scales to assess the optimal suite and scale of projects that would maximize basin yield.

2. RECOMMENDATION 2: REVISE HOW PROJECTS DEPENDENT ON OTHER PROJECTS ARE PRESENTED AND/OR PRIORITIZED

There are multiple projects described in the dBOP as dependent on one or more other projects. While there is a scoring metric for a project's dependency on other projects, as approved by the TAC, there is not a corollary scoring metric to increase the priority of projects on which other projects depend. Additionally, the institutional relationship

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

2.1 Recommendations:

- Consider revising how the dependencies are described in Projects 1, 3, 4, and 5.
- Include text regarding the institutional relationships between projects and identify institutional incompatibility of projects.
- Consider revisiting how interdependent projects are prioritized so that project on which other projects depend are prioritized at least as highly as those that depend on them.
- Consider including other factors on which projects in the dBOP depend, such as brine disposal for Project 4.
- Consider adding a graphic that visually conveys project interdependencies.

2.2 Technical Rationale for Recommendation:

The interdependencies between projects are not described adequately in the document. The most significant example of this is in the text is Project 4, the Moorpark Desalter. The text states that the Benefits of Projects 1, 3 and 5 are not fully realized unless the Moorpark Desalter project is implemented, but the desalter project is not among the prioritized projects and is not proposed for inclusion in the BOYS (Table 3). This leaves the reader confused as to why modeling of Project 4 is not included when Project 1 appears dependent

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

on it. Revising the descriptions and details of these projects in the dBOP to clarify these dependencies and institutional incompatibilities will reduce confusion.

2.3 Summary of Facts in Support of Recommendation:

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

2.4 Additional Comments

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

3. RECOMMENDATION 3: REVIEW AND ADDRESS APPARENT INCONSISTENCIES IN WATER SUPPLY / YIELD BENEFITS

TAC members identified multiple instances of inconsistent quantification of water supply benefits for projects in the dBOP. These inconsistent quantifications included assigning benefits to projects dependent on other projects without specifically addressing those dependencies (as described in Recommendation 2), presentation of the maintenance of existing conditions as a future benefit, and apparent misunderstandings or ineffective presentation of project effects on the LPVB water budget. If benefit quantification is undertaken the scoring of affected projects should be revisited.

3.1 Recommendations:

- Reconsider how the benefits from projects that are dependent on other projects are presented and scored. If the project on which another project depends does not move forward, then the benefits of the dependent project will not be realized. This recommendation applies to Projects 1, 3, and 5.
- Revise how the benefits associated with Project 4 are described. The current description indicates that pumping 6,720 AFY will increase recharge by 2,200 AFY, which was called out by three of the four reviewing TAC members as confusing or incorrect.
- Revise the water supply / yield augmentation benefit of Project 6 from the volume of diverted water to the volume of avoided evapotranspiration losses associated with current transfer methods.

- Revise how the benefits of projects that continue existing conditions and/or practices are quantified. This applies to Projects 1 and 5.

3.2 Technical Rationale for Recommendation:

- As discussed in Recommendation 2, the benefit from a project that is dependent on another project cannot be realized without implementing both projects. Projects 1, 3, and 5 are presented and scored assuming that Project 4 will be implemented. However, Project 4 is not proposed for consideration in the dBOP. Either the presentation, scoring, and prioritization should be modified so that Project 4 is moved forward to the BOYS or the benefits and scoring of Projects 1, 3, and 5 should be revised to lower values appropriate for current conditions.
- The water supply / yield augmentation benefit of Project 4 is incorrect. Assuming the values of pumping and additional recharge presented in the text are correct, the actual water supply / yield augmentation benefit of Project 4 is the difference between project pumping and increased recharge, which is -4,070 AFY (note: the negative sign indicates that, as a standalone project, it would simply increase ELPMA groundwater pumping by 4,070 AFY without an offsetting increase in recharge). However, the 2,200 AFY of increased recharge is based on old information about Simi inflows to the ELPMA, which have declined significantly in recent years. Because Simi inflows have decreased, the amount of increased recharge induced by the project is likely less than 2,200 AFY under present and anticipated future conditions. Thus, the unmitigated groundwater pumping increase would likely be more than 4,070 AFY. While it may be possible to increase pumping by some amount in this part of the Basin without triggering additional undesirable results that should be quantified with modeling as described in Recommendation 2.
- For Project 6, diverting 3,000 AFY of recycled water from Simi Valley for pipeline delivery would reduce the amount water that percolates into ELPMA along the arroyo. The actual water supply benefit of Project 6 is equal to the amount of avoided evapotranspiration losses along the arroyo. The sustainable yield increase would depend on where the water is delivered, with maximal benefit for delivery to one or both areas of the Basin where modeling shows that undesirable results are likely under baseline conditions (i.e., eastern WLPMA and northern ELPMA) and minimal benefit elsewhere.
- Project 5 will not increase the sustainable yield of ELPMA because it proposes to maintain existing recharge sources that are already accounted for in the sustainable yield.

3.3 Summary of Facts in Support of Recommendation:

- The benefit from a project that is dependent on another project cannot be realized without implementing both projects.
- Increasing pumping as proposed for Project 4 to induce recharge does not represent an increase in water supply when the volume of expected recharge is less than the volume of pumping.
- The water supply benefit of Project 6 is equal to the amount of avoided evapotranspiration losses along the arroyo.

- Project 5 will not increase the sustainable yield of ELPMA because it proposes to maintain existing recharge sources that are already accounted for in the sustainable yield.

4. RECOMMENDATION 4: CONSIDER REVISING AND ADDING TO DISCUSSION OF BENEFITS TO AND IMPACTS ON WATER QUALITY FROM PROJECTS

TAC members are concerned that several of the proposed projects may continue or worsen water quality impacts from recharging poor quality water along the Arroyo-Simi Las Posas. The GSP indicates that historical inflow from Simi Valley and percolated treated wastewater have caused high salt concentrations in the ELPMA. It is unclear how Projects 4 and 5 will improve groundwater quality by inducing additional recharge from these same sources.

4.1 Recommendations:

- Include discussion of water quality impacts and potential for benefits in the BOP and/or BOYS.
- Further clarify how water quality is expected to improve by implementing Project 4

4.2 Technical Rationale for Recommendation:

Projects 4 and 5 include pumping in an area of elevated salinity to provide additional storage space for recharging from the same source of poor quality water that caused the elevated salinity.

4.3 Summary of Facts in Support of Recommendation:

- The dBOP description of Project 5 indicate that potential impacts to water quality are unknown.
- Water quality in the area of Projects 4 and 5 has historically been impacted by inflows from Simi Valley and percolated treated wastewater at the Moorpark Water Reclamation Facility.

5. RECOMMENDATION 5: INCLUDE IN LIEU DELIVERIES TO NORTHERN EAST LAS POSAS MANAGEMENT AREA (PROJECT 7) IN MODELING APPROACH

The TAC recommends including Project 7 in the BOYS project model scenarios. In discussing the project ranking in the dBOP, TAC member Bryan Bondy indicated that this project could be considered as feasible as Project 2 referenced above and should be included in the with project modeling for the BOYS. Specifically, Mr. Bondy indicated that the infrastructure to deliver in lieu water to the northern ELMPA exists within the local Waterworks district and there is likely water available for in lieu delivery in all but the most extreme drought years. Our recommendation is to revise how this project is described in the BOP and will be presented in the related Recommendation Report.

This recommendation was also provided in response to the Committee Consultation request for the Basin Optimization Yield Study Modeling Approach submitted to the Watermaster on January 21, 2025.

5.1 Recommendations:

The TAC recommends reevaluating the scoring for Project 7 to prioritize it similarly to Project 2. Specific details of locations of in lieu deliveries and available volumes should be coordinated with the Waterworks District.

5.2 Technical Rationale for Recommendation:

This is an area of the LPVB that has exhibited historical groundwater elevation declines that locally exceed 250 feet and groundwater elevation trends differ from other areas of the ELPMA. This implies that the area is not well connected to recharge from the Arroyo Simi-Las Posas, so regional projects to increase recharge are unlikely to benefit the northern ELPMA.

The infrastructure and alternative water supply required to provide in lieu water to the northern ELPMA exist and are likely available. The maximum volume of water that could be delivered for in lieu use could be roughly identified for modeling purposes by coordinating with the local Waterworks District. Modeling could then proceed using an iterative optimization approach.

5.3 Summary of Facts in Support of Recommendation:

- The northern ELPMA has historically exhibited significant groundwater elevation declines
- Groundwater elevations in the ELPMA indicate that the area is not well connected to regional recharge from the Arroyo Simi-Las Posas
- A local approach to addressing water level declines in this area is necessary to achieve sustainability
- An in lieu project could be modeled with rough estimates of in lieu water availability and application locations using an iterative approach to optimize benefits

6. RECOMMENDATION 6: RECONSIDER HOW PROJECTS WITHOUT SPECIFIC WATER SUPPLY BENEFITS ARE CONSIDERED

The TAC noted that there are projects without specific water supply, augmentation, or yield improvement benefits included in the dBOP. While we understand that these are projects included in the GSP and/or Judgment and were assessed in the dBOP as a result, we do not know that they fit in the dBOP as presented. Given that the dBOP is intended to set the stage for the projects evaluated in the BOYS, it makes sense that projects without basin yield benefits would not score well or be given high priority. However, members of the TAC commented that these data gap filling projects have other benefits that should not be ignored when considering whether or not to move them forward. These comments and recommendations are specifically directed to Projects 9 and 10, which include construction of dedicated monitoring wells and equipping monitoring wells with transducers for better water level data collection. While these projects do not have the potential to add yield to the LPVB, they are a mechanism for tracking groundwater conditions, identifying trends, and avoiding undesirable results in the basin.

6.1 Recommendations:

Consider evaluating data gap filling Projects 9 and 10 separately from the other projects in the BOP and advancing them without including them in the BOYS.

6.2 Technical Rationale for Recommendations

Increased monitoring cannot directly increase the operational or sustainable yield of a groundwater basin. However, it is a critical component of sustainable management of groundwater resources. Without routine, reliable, and accurate monitoring of groundwater elevations and quality it is impossible to assess, maintain, or achieve groundwater sustainability.

6.3 Summary of Facts in Support of Recommendations

- Projects 9 and 10 do not have the potential to increase the operational yield of the LPVB.
- Historical monitoring of groundwater elevations in the LPVB has been less consistent and widespread than would be expected for a high use and dynamic groundwater system.
- Adding dedicated groundwater monitoring wells and better data collection tools will benefit the LPVB in the long-term.

7. RECOMMENDATION 7: REEVALUATE PROJECT SCHEDULE CONSIDERING TAC MEMBER COMMENTS

TAC members commented that the schedule presented in Appendix C is too short for some projects and perhaps too long for others. We also noted that the schedule does not clearly identify which projects are proposed for advancement or the relationship between projects.

7.1 Recommendations:

Consider comments and recommendations in the attached tabular summary.

7.2 Technical Rationale for Recommendations

See individual comments and recommendations regarding schedule in the attached tabular summary.

7.3 Summary of Facts in Support of Recommendations

See individual comments and recommendations regarding schedule in the attached tabular summary.

8. RECOMMENDATION 8: REEVALUATE PROJECT COST ESTIMATES AND PRESENTATION CONSIDERING TAC MEMBER COMMENTS

TAC members provided multiple comments, questions, and recommendations regarding the presentation of project costs. These comments identified missing cost estimate information for multiple projects, inconsistent presentation of costs, potential underestimates of costs, and omission of important cost components including operations and maintenance, funding

mechanisms, future rate increases, etc. Consistent and complete cost estimate information is important for evaluating projects when costs are included in the prioritization criteria.

8.1 Recommendations:

Consider comments and recommendations in the attached tabular summary, including:

- Include all cost components for each project in a consistent format in the text and tables.
- Include capital expenses, operating expenses, and other costs for each project.
- Include reasonable changes in rates for unit based components of long-term projects.
- Describe likely funding mechanisms for each project, including both capital and operating expenses.

8.2 Technical Rationale for Recommendations

See individual comments and recommendations regarding costs in the attached tabular summary.

8.3 Summary of Facts in Support of Recommendations

See individual comments and recommendations regarding costs in the attached tabular summary.

9. RECOMMENDATION 9: ACKNOWLEDGE AND PRESENT PLANS FOR CONSIDERING POTENTIAL EFFECTS ON NEIGHBORING BASINS

Potential impacts on neighboring basins are not well described in the dBOP. While these potential impacts may not be known until additional analysis is completed, the possibility of impacts to neighboring basins should be acknowledged in the dBOP.

9.1 Recommendations:

Add a subsection addressing the potential to impact neighboring basins for each project and describe how those potential impacts will be evaluated prior to project implementation.

9.2 Technical Rationale for Recommendations

SGMA requires consideration of and coordination with neighboring basins when assessing groundwater conditions, establishing sustainable management criteria, and planning for projects and management actions.

9.3 Summary of Facts in Support of Recommendations

Multiple projects included in the dBOP include changes to local and/or regional surface and groundwater flows. The potential for these changes to effect neighboring groundwater basins should be acknowledged and assessed.

10. RECOMMENDATION 10: REVIEW EDITORIAL COMMENTS PROVIDED BY TAC IN TABULATED COMMENT MATRIX

The TAC members each prepared detailed tabulated comments numbered by commentor with references to specific section and page numbers and quoted text. Many of these comments are editorial in nature and identify apparent errors in the dBOP, including typographic and formatting errors and unclear text.

10.1 Recommendations:

Consider revising the text to address the comments identified as editorial and clarification in the attached tabular comment matrix.

10.2 Technical Rationale for Recommendation:

See individual editorial comments for rationale.

10.3 Summary of Facts in Support of Recommendation:

A summary of facts for this recommendation is not applicable.

TALLY OF COMMITTEE MEMBER VOTES

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

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

REPORT OF BASES FOR MAJORITY AND MINORITY COMMITTEE MEMBER POSITIONS

The TAC vote to present the recommendations above to the Watermaster was unanimous, as indicated above. The bases for the unanimous positions are described for each recommendation above. No minority positions were expressed by voting or non-voting TAC members.

Attachment 1

TAC Member Individual Comments; Draft Initial Basin Optimization Plan

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

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment
BB-1	Bryan Bondy	Technical	Overarching Comment	N/A	N/A	N/A	While the BOP appears to meet the letter of the Judgment it does not appear to meet the spirit of the Judgment to "optimize" the basin by seeking to augment the Basin Optimization Yield, and ultimately the Sustainable Yield, to be no less than 40,000 AFY" (Judgment §4.9.1.2) by including "Basin Optimization Projects that are likely to be practical, reasonable, and cost-effective to implement prior to 2040 to maintain the Operating Yield at 40,000 AFY or as close thereto as achievable" (Judgment §5.3.2.1). Given that the Basin Optimization Yield and the Sustainable Yield are controlled by avoiding undesirable results, optimizing the yield would be accomplished by prioritizing the projects that have the greatest likelihood of avoiding undesirable results with the least cost. This means focusing on the two areas of the Basin where modeling has shown that undesirable results are likely under baseline conditions (i.e., eastern WLPMA and northern ELPMA). Prioritization of projects in those areas is necessary to optimize the Basin yield, but is not discussed in the BOP nor is it a consideration in the project scoring methodology. Item 14 of the project scoring methodology could be reworked to instead award more points for projects that address areas where modeling shows that undesirable results are likely under baseline conditions. Alternatively, a 15th criterion could be added. In either case, enough points should be awarded to prioritize projects that address areas where modeling shows that undesirable results are likely under baseline conditions. As an alternative to modifying or adding criteria, the projects could be divided into and presented in two groups within the BOP: (1) projects that address areas where modeling shows that undesirable results are likely under baseline conditions and (2) projects that may increase water supply, but not in areas where modeling shows that undesirable results are likely under baseline conditions (i.e. projects that add water in areas that would not increase the sustainable yield absent another project to move water or pumping).
BB-2	Bryan Bondy	Technical	Clarification	2	1.2, second bullet	*"Improve water quality management of the LPV;"*	This bullet should be preceded by "and/or" because not every project improves water quality management of LPV.
BB-3	Bryan Bondy	Technical	Project No. 1 Water Supply / Yield Augmentation Benefit	Various	Table 1; 2.2.1, 2.2.2.1, 2.2.1.2, 2.2.1.4	*Table 1: Water Supply / Yield Augmentation Up to 2,680 AFY ; Section 2.2.1: "If all of the Arundo within the 324-acre area is removed, this project could result in up to an additional 2,680 AFY of recharge to the ELPMA (VCWSD 2015). This project is anticipated to increase groundwater recharge to the ELPMA and improve the health of riparian habitat along Arroyo Simi-Las Posas." Section 2.2.1.1: "Implementation of this project could increase recharge to the ELPMA by as much as 2,680 AFY (VCWSD 2015)." Section 2.2.1.2: "While this project is not dependent on other unbuilt projects, the full benefits of this project may require implementation of other projects." Section 2.2.1.4: "The increased recharge will directly impact the water levels and groundwater in storage to provide increased flexibility in basin management to maintain groundwater levels above minimum thresholds and at the measurable objectives."*	The First Periodic Evaluation of the LPVB GSP concluded that increased flows in Arroyo-Simi Las Posas above recent (2016-2023 average rates) does not significantly increase the volume of recharge to ELPMA. Therefore, at present, the water supply / yield augmentation benefit of Project No. 1 should be expected to be insignificant if implemented as a standalone project. Achieving the stated water supply / yield augmentation benefit would be fully dependent on implementation of another project(s), such as the Moorpark Desalter. Even then, this project would not address the two areas where modeling shows that undesirable results are likely under baseline conditions (i.e., eastern WLPMA and northern ELPMA) unless coupled with another project to offset pumping in those areas. The cited text, per AF cost, schedule, and project scoring should be revised accordingly.
BB-4	Bryan Bondy	Technical	Project No. 2 Water Supply / Yield Augmentation Benefit	Various	Table 1; 2.2.2.1	*Table 1: Water Supply / Yield Augmentation 1,760 AFY ; Section 2.2.2.1: "In 2019, it was estimated that 1,762 AFY of CMWD water would be available for purchase and delivery to Zone MWC and VCWWD-19.."*	The water supply / yield augmentation value for this project should be based on the amount of in-lieu deliveries necessary to stabilize groundwater levels in eastern WLPMA, which may be less than the 1,760 AFY of available water assumed during GSP development. The minimum amount of in-lieu necessary to avoid minimum threshold exceedances in the WLPMA pumping depression should be estimated via analysis of the relationship between groundwater levels and groundwater extraction rates. The cited text, per AF cost, and project scoring should be revised accordingly based on this initial in-lieu estimate. The in-lieu estimate should then be confirmed with modeling during BOYS development.

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

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

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

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

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

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

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

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

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

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

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

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

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

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment
TM-13	TMorgan	Technical	project costs	21	2.2.10.3	*...cost is anticipated to be approximately $140,000 for eleven well locations...*	The $140K cost is just the CAPEX. Transducer networks require ongoing maintenance, field verification, instrumental drift evaluations, periodic equipment replacement, and analyses of the newly acquired data. These OPEX expenses should be a part of the cost evaluation.
TM-14	TMorgan	Technical	project costs	7	2.2.2.3	*...by funding the difference between the cost of CMWD and the cost of pumping.*	Is part of the incentivization program to allow Zone MWC and VCWWD-19 to carry over their unused GW allocation? OR is that allocation forfeited ? This section does not discuss how the project would be funded except in general terms (i.e., incentivization). Expected this section to indicate that an "incentivization plan" would be developed by end of 2025 (for example).
TM-15	TMorgan	Technical	project costs	7	2.2.2.3	*...CMWD's 2024 Tier 1 water rate is $1,730 per AF.*	It would be appropriate to include a brief acknowledgement that the Tier 1 rates are expected to increase in the future. Consequently, the per AF costs for this project will increase by a yet to be determined amount in the future.
TM-16	TMorgan	Editorial	recognition of stakeholder input	8	2.2.2.4	*...coordination between FCGMA, CMWD, VCWWD-19, and Zone MWC.*	add "and basin stakeholders" to this list.
TM-17	TMorgan	Technical	Undesirable Results	8	2.2.2.4	*Implementation of this project is not anticipated to cause Undesirable Results...*	The project is not expected to cause Undesirable Results, but is it expected to mitigate a Significant and Unreasonable Impact(s)?
TM-18	TMorgan	Technical	downstream impacts	8	2.2.3.1	*...this project could provide up to 2,000 AFY of diversions to their percolation ponds...*	Has the impact of the loss of 2,000 AFY of water to the Pleasant Valley basin been evaluated? How will this be handled during the modeling effort since use of the OPV model is not a part of this study plan?
TM-19	TMorgan	General Editorial	project timing	8	2.2.3.2	*...construction of the diversion facilities could be completed in a single phase by June 30, 2027.*	This is a very aggressive project schedule considering permitting and CEQA/NEPA has not yet been started. Appendix D shows construction extending through Q3 2027.
TM-20	TMorgan	Technical	language clarification	9	2.2.3.2	*...the full benefits of this project may require implementation of other projects, like the Moorpark Desalter (Project No. 4), that lower groundwater elevations in the Shallow Alluvial Aquifer to provide adequate available storage to realize the full benefits of recharge to the ELPMA.*	The interdependencies between projects are not emphaszed adequately in the document. The benefits of this project are not fully realized unless the Moorpark Desalter project is implemented, but the desalter project is not among the prioritized projects and is not proposed for inclusion in the BOYS (Table 3). Does this mean that stormwater capture should be contingent on the desalter project? How would the modeling be performed to show the benefits of the stormwater capture without also including the desalter project?
TM-21	TMorgan	Technical	project costs	9	2.2.3.3	*No outside sources of funding to construct this project have been identified.*	Is the implication that VCWWD-1 will bear the full costs of this $4,000,000 (CAPEX) project? The funding element is not discussed. Will pumpers in the basin be expected to cover the CAPEX and OPEX costs since no outside funding sources have been identified?
TM-22	TMorgan	Technical	collaboration required	9	2.2.3.4	*...this project will require coordination between FCGMA and VCWWD-1.*	Coordination/collaboration needed from CDFW, RWQCB, and ACOE. Suggest adding these agencies to the sentence.
TM-23	TMorgan	Technical	possible interbasin impacts	9	2.2.3.4	*Implementation of this project is not anticipated to cause Undesirable Results...*	What is the impact to Pleasant Valley basin? Might this loss of water be perceived as a triggering event for Undesirable Result(s)? How will this be evaluated in the BOYS?
TM-24	TMorgan	Technical	language clarification	9	2.2.3.4	*...this project would aid in maintaining groundwater elevations above the minimum thresholds throughout the ELPMA.*	This sentence implies that GW levels are currently above the MTs without the project. Is this project needed to achieve MTs in ELPMA?
TM-25	TMorgan	Technical	project water balance	10	2.2.4	*...groundwater flow modeling study suggests that pumping 6,270 AFY for the desalter project would result in an additional 2,200 AFY of recharge to the ELPMA.*	2,200AFY of enhanced surface water recharge is partiallly offset by the exported brine ~1,568AFY (assumed 25% of 6,270AFY) = 632AFY. The net benefit appears to be much less that 2,200 AFY of additional recharge.
TM-26	TMorgan	Technical	project benefits	10	2.2.4.1	*... it is estimated that this project would increase the sustainable yield of the ELPMA by 2,200 AFY.*	This is not clear to the reader. Pumping 6,270 AFY equates to an increase in the sustainable yield by 2,200 AFY?
TM-27	TMorgan	Technical	project assumption	10	2.2.4.2	*"This project is not dependent on other unbuilt projects or projects that are currently under construction."*	The SMP does not extend to desalter location. This project is dependent on an SMP extension to the desalter location (or some other brine disposal option).
TM-28	TMorgan	Technical	project assumption	10	2.2.4.2	*VCWWD-1 has not completed a feasibility study for this project.*	This language is not consistent with 2.2.4 and 2.2.4.1 that references preliminary GW modeling and preliminary analyses...have been completed...

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

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment
TM-29	TMorgan	Technical	project costs	11	2.2.4.3	*No outside sources of funding to construct this project have been identified.*	Is the project proponent suggesting it bear the full costs of this $40,000,000 (CAPEX) project? The funding element is not discussed. Will pumpers in the basin be expected to cover the CAPEX and OPEX costs since no outside funding sources have been identified?
TM-30	TMorgan	General Editorial	incomplete sentence	11	2.2.4.4	*...distribution of desalted water, this project.*	incompete sentence...missing words after "...this project."
TM-31	TMorgan	Technical	project benefits	12	2.2.5.1	*...implementation of this project could increase the sustainable yield of the ELPMA by as much as 2,000 AFY.*	How does securing this water flow into the future increase the sustainable yield? This flow is happening now, so this input was used to calculate the current sustainable yield. Isn't the idea behind this project to secure this water source into the future?
TM-32	TMorgan	Technical	project premise	13	2.2.5.4	*...perennial surface water flow in Arroyo Simi-Las Posas is also thought to be the primary source of high TDS concentrations observed in the groundwater in the southern ELPMA (FCGMA 2019). Consequently, the water quality of the surface water flows will have to be investigated further and addressed through project implementation.*	This statement says that we don't know if the water quality of the surface water flows would actually support the project contentions that high TDS GW originated from the surface water AND it is "unknown" if the future water quality would be sufficiently better that the GW quality would improve enough to justify the project costs. Feels like the basic premise of the project is suspect if the water quality must be studied further and possibly addressed by adaptive management.
TM-33	TMorgan	Technical	project benefits	13	2.2.5.4	*...and provide flood control benefit.*	This is the first mention of flood control benefits. How does this benefit fit into the optimization goal of achieving and maintaining the Operational Yield at 40,000 AFY?
TM-34	TMorgan	Technical	project impacts	14	2.2.6.1	*...the City indicated that approximately 3,000 AFY of recycled water would be available...*	What is the impact to the Simi Valley basin of exporting 3,000 AFY of recycled water? How will this plan evaluate this potential impact? This is an in-lieu project...substituting imported recycled water for GW extractions.
TM-35	TMorgan	Technical	project impacts	14	2.2.6.2	*Project benefits.*	Suggest saying "Project benefits and impacts"
TM-36	TMorgan	Technical	project costs	15	2.2.6.3	*...does not include any costs required to construct, operate, and maintain local desalters to treat the recycled water...*	Suggest adding text to acknowledge that these costs do not include the costs of brine disposal from the desalters which could include a brine pumping station and conveyance pipeline. Is the brine envisioned to be disposed of in the SMP? If the SMP is the disposal mechanism, then the costs do not include the connection fees (and construction costs to make the connection) or the ongoing unit disposal costs. The costs for this project are much greater than $700/AF.
TM-37	TMorgan	General Technical	agency collaboration	15	2.2.6.4	*...will require coordination between FCGMA, the City, and Las Posas Valley Users*	Suggest adding RWQCB to the list.
TM-38	TMorgan	Technical	project impacts	15	2.2.6.4	*...water level recovery benefits would be quantified through numerical modeling conducted in the Phase I Feasibility Study.*	Section 2.2.6.2 does not include GW modeling in the Phase I Feasibility activities. What GW model would be used to assess the impact to Simi Valley basin of this water export to the LPV basin?
TM-39	TMorgan	Technical	project description	15	2.2.7	*...evaluate the feasibility of providing supplemental water supplies...*	It would be helpful to the reader to know the potential source(s) of supplemental water that are proposed to be evaluated. This information could also be included in Section 2.2.7.1.
TM-40	TMorgan	Editorial	grammar / editorial	16	2.2.7.1	*...willing to use...*	willingness to use
TM-41	TMorgan	Technical	project concept	16	2.2.7.1	*...will not provide a new source of water supply to the LPV...*	Reader is left wondering what this project does... if it doesn't supply new water to the area, is it a demand reduction project? Section 2.2.7 indicated "Supplemental water supplies to this area will reduce groundwater demand in this part of the ELPMA."
TM-42	TMorgan	Editorial	document organization	17	2.2.7.4		No text is provided under this heading. If there are no benefits, suggest making that statement.
TM-43	TMorgan	Technical	project description	17	2.2.7.5	*...identify entities that are able to receive and deliver supplemental water...*	Suggest including the potential supplies of the supplemental water in this sentence. ...identify entities that are able supply or receive and deliver supplemental water...
TM-44	TMorgan	Editorial	document organization	18	2.2.8.4		No text is provided under this heading. If there are no benefits, suggest making that statement.
TM-45	TMorgan	Technical	entity collaboration	18	2.2.8.5	*...will require coordination between FCGMA and the PAC and TAC...*	Add "basin stakeholders" to this sentence.
TM-46	TMorgan	Technical	project costs	22	2.3.1	*...sufficiently defined to implement without additional feasibility studies to define project scopes, costs, and benefits.*	Many of the projects do not have defined costs for both CAPEX and OPEX. OPEX, for several projects, is poorly assessed or not assessed at all. The interdependencies of some projects with others (to achieve the stated anticipated benefits) means that the actual costs for some projects are not stand alone values and should be viewed in conjunction with the interdependent project costs.

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

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

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

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

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

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

aquilogic, Inc.
environment ● water ● strategy

245 Fischer Avenue, Suite D-2
Costa Mesa, CA 92626
Tel. +1.714.770.8040
Web: www.aquilogic.com

MEMORANDUM

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

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

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

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

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

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

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

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

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

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

Watermaster also requested specific commentary on:

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

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

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

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

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