

LAS POSAS BASIN POLICY ADVISORY COMMITTEE MEETING

NOTICE OF MEETING

NOTICE IS HEREBY GIVEN that the Las Posas Basin Policy Advisory Committee (PAC) will hold a HYBRID meeting at 3:00 P.M. on **Thursday, February 5, 2026,**

at the Calleguas Municipal Water District offices:

2100 Olsen Road, Thousand Oaks, CA 91360

and via Zoom at the following address:

<https://us06web.zoom.us/j/83642637400?pwd=8KSqxi2GG2ijPZvNplAcUNyuxDBa1Y.1>

Webinar ID: 836 4263 7400 | Passcode: 160873

AGENDA

A. Call to Order

B. Roll Call

C. Agenda Review

D. Public Comments

E. PAC Member Comments

F. Regular Agenda

1. Approve the Minutes of the January 15, 2026 Meeting

2. Draft Basin Optimization Yield Study

Watermaster provided the attached memo regarding the draft Basin Optimization Yield Study (BOYS) on December 17, 2025. The Judgment provides the PAC a 60-day review period, putting the deadline for the PAC's Recommendation Report at February 16, 2026.

At its January 15, 2026 meeting, the PAC discussed the BOYS. Individual committee members' comments are collected in the attached comment matrix; they will be made part of the Recommendation Report when it is submitted ahead of the February 16 deadline.

Also attached is a draft Recommendation Report cover memo. The PAC will discuss both these documents and consider approval of them as a Recommendation Report.

Due to the file size, the draft BOYS document is not included in this packet but, rather, is available at the LPV Watermaster website: https://fcgma.org/lpv_boys/.

3. Draft 2025 Annual Report

On January 15, 2026, Watermaster submitted to the PAC the attached memo regarding the draft LPV GSP Annual Report.

The PAC will discuss the draft 2026 Annual Report and what comments it would like to include in its Recommendation Report. Watermaster requests feedback by February 15, 2026.

Due to their size, the annual report and all supporting documents are not included in this packet but are instead available at the link in the attached memo.

4. Regional Desalter

On January 28, 2026, Watermaster submitted to the PAC the attached memo regarding the East Las Posas Management Area (ELPMA) regional desalter Basin Optimization Project.

The Basin Optimization Plan (BOP) lists a feasibility study for a regional desalter as a Basin Optimization Project to be carried out during this cycle. As described in the attached memo, Calleguas Municipal Water District is pursuing a study regarding groundwater desalination in the Upper Calleguas Creek Watershed. Watermaster proposes partnering with Calleguas as an “efficient, cost-effective, and strategic approach for completing the regional desalter feasibility study and advancing the basin optimization project required by the judgment.”

The ELPMA lies entirely within the Calleguas service area and the geographical area of focus for their desalter study. The Calleguas plan already covers much of the scope of work developed for the Watermaster regional desalter project and can easily be expanded to incorporate any additional scope specific to the Watermaster BOP project.

Watermaster requests PAC’s recommendation by February 6, 2026.

G. PAC Subcommittee Reports

PAC representatives on subcommittees will provide reports.

1. Operations Subcommittee
2. Executive Subcommittee
3. Fiscal Subcommittee
4. TAC Subcommittee

H. Written Communication

None.

I. Future Agenda Items

The PAC will consider items for future agendas.

J. Adjourn

Attachments

PAC 2026-01-15 Meeting Minutes

Watermaster memo regarding the Draft Basin Optimization Yield Study

PAC Member Comments, Draft LPV BOYS Master List

PAC draft Recommendation Report cover memo

Watermaster memo regarding the Draft 2025 GSP Annual Report

Watermaster memo regarding the ELMPA Regional Desalter Feasibility Study

LAS POSAS VALLEY BASIN POLICY ADVISORY COMMITTEE

Meeting Minutes for January 15, 2026

The Las Posas Valley Basin Policy Advisory Committee (PAC) held a regular hybrid meeting at 3:00 PM on Thursday, January 15, 2026, at Calleguas Municipal Water District, 2100 Olsen Road, Thousand Oaks, CA, and via Zoom.

A. Call to Order: Chair Ian Prichard called the meeting to order at 3:17 PM.

B. Roll Call

The following PAC members were present:

1. Calleguas Municipal Water District – Ian Prichard, Chair
2. West Las Posas Large Agricultural – Rob Grether, Vice-chair
3. Zone Mutual Water Company – John Menne
4. East Las Posas Large Agricultural – David Schwabauer
5. East Las Posas Small Agricultural – Patty Martinez
6. East Las Posas Mutual Water Company – Laurel Servin
7. West Las Posas Small Agricultural – Richard Cavaletto
8. West Las Posas Mutual Water Company – Steven Murata
9. LPV Watermaster (non-voting) – Farai Kaseke

The following PAC members were absent:

1. Ventura County Waterworks Districts 1 and 19 – Paul Chan
2. Commercial – Arturo Aseo

C. Agenda Review: No changes or corrections to the agenda were requested.

D. Public Comments: There were no public comments.

E. PAC Member Comments: There were no PAC member comments.

F. Regular Agenda

1. Approve the Minutes of the November 20, 2025, Regular PAC Meeting

Vice-chair Grether moved to approve the minutes as presented for the November 20, 2025, meeting; Richard Cavaletto seconded the motion. The motion passed with a vote of 8-Ayes; 0-Nays; 0-Abstentions; 2-Absent.

2. Draft Basin Optimization Yield Study

On December 17, 2025, LPV Watermaster issued a Committee Consultation request for the PAC to perform a review of their draft Basin Optimization Yield Study (BOYS). Pursuant to the Judgment, the PAC is afforded a 60-day review period, establishing a deadline of February 16, 2026, for submission of the PAC's Recommendation Report.

During this meeting, the PAC discussed the draft BOYS document and the development of a draft Recommendation Report.

Some PAC members reported difficulty accessing the BOYS document through the provided agenda link and were therefore unable to review the report prior to the meeting. Chair Prichard requested that Watermaster post this document, all future reports, and related materials on the Watermaster website for ease of access. Watermaster agreed to post these items as requested.

Tony Morgan, PAC Administrator, will circulate a template to all PAC members so they can post individual written comments and recommendations regarding the draft BOYS document. The due date for these responses is Monday, January 26, 2026.

The draft Recommendation Report will be finalized at the next PAC meeting scheduled for February 5, 2026.

Richard Cavaletto initiated a discussion on the importance of PAC members understanding the anticipated costs and potential financial risks associated with implementing the two proposed projects listed in the BOYS document and any future projects, as well as the financial implications of not proceeding with any projects to balance the Basin and meet SGMA requirements. It was noted that consideration should be given to the following:

- a. The current BOYS assumes that all allocations will be used each water year – should alternative scenarios be modeled?
- b. Potential impact of future rampdown and resulting reductions to annual allocations
- c. Increased Basin assessment costs per acre-foot (AF)
- d. Potential impact of the developing water market, which allows for the sale or lease of allocations

The PAC discussed whether the financial information should be included in the BOYS document. Chair Prichard clarified that the BOYS model does not support the inclusion of financial scenarios and additional modeling would be required to evaluate the economic implications of project implementation. Watermaster stated that the purpose of this study is to determine the optimized yield for the Basin and not to evaluate the economic impacts of pursuing one course of action over another.

The Judgment calls for a linear rampdown between now and 2040 to achieve the target sustainable yield. The current study assumes that pumpers will use their full allocations each year; however, recent reported data indicate that usage has been at or below 32,000 AF for each of the past two water years. Since Watermaster is required to perform a full BOYS every five years—with the next BOYS scheduled for 2030 (as the current BOP and BOYS are behind schedule), Vice-Chair Grether suggested that one approach could be to wait three years to

obtain five full years of data before recommending any rampdown. This decision is pending further input from the PAC.

Watermaster and committee members agreed that access to this financial information is critical for PAC members in communicating with constituents and supporting long-term business and financial planning.

John Menne suggested that the PAC develop a uniform approach for communicating key information to LPV water rights holders to ensure consistent messaging. The PAC discussed the possibility of holding a hybrid Town Hall-style meeting to disseminate information on Basin projects, their anticipated benefits, and the associated decision-making process.

These issues were noted for future consideration and action by the PAC.

G. PAC Subcommittee Reports

1. Operations Subcommittee: No meeting; nothing to report.
2. Executive Subcommittee: No meeting; nothing to report.
3. Fiscal Subcommittee: No meeting; nothing to report.
4. TAC Subcommittee: The primary focus of the TAC meeting was the review of the draft BOYS report. The next TAC meeting is scheduled for January 20, 2026, at 2:00 PM.

H. Written Communication: No new written communication was presented.

I. Future Agenda Items:

The next PAC meeting will focus on: 1) finalizing the PAC's Recommendation Report for the BOYS document, and 2) reviewing the LPV Watermaster Annual Report, which is expected to be distributed on January 15, 2026, with a 31-day required turnaround, making it due on February 16, 2026.

J. Adjournment

Chair Prichard adjourned the meeting at 5:02 PM until the next regular hybrid meeting scheduled for February 5, 2026, at 3:00 PM.

FOX CANYON GROUNDWATER MANAGEMENT AGENCY

LAS POSAS VALLEY WATERMASTER



MEMORANDUM

Date: December 17, 2025
To: Las Posas Valley Watermaster Policy Advisory Committee
From: Kudzai F. Kaseke, Assistant Groundwater Manager
Subject: Committee Consultation on the Draft Las Posas Valley Basin, Basin Optimization Yield Study.

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

Pursuant to Section 4.10.1.1 of the Las Posas Valley Water Rights Coalition, et al. v. Fox Canyon Groundwater Management Agency, Santa Barbara Sup. Ct. Case No. VENC100509700 (Judgment), Watermaster shall, with Committee Consultation, undertake a Basin Optimization Yield Study (BOYS) to be finalized in 2025. The Judgment requires that Watermaster share a draft BOYS with the Technical Advisory Committee (TAC) and Policy Advisory Committee (PAC) before Watermaster adopts the study.

On April 03, 2025, Watermaster submitted a consultation request to both TAC and PAC requesting comments on the preferred modeling alternative and impacts to schedule. Specifically, whether Watermaster should use the United Water Conservation District (UWCD) Periodic Evaluation model files to run scenarios for preparation of the BOYS rather than estimating the Basin Optimization Yield and Rampdown (i) using GSP periodic evaluation model simulations or (ii) using historical groundwater elevation measurements and extraction reports. Both TAC and PAC agreed that the Watermaster and Dudek's preferred alternative was the best approach to conduct the BOYS under the circumstances. On July 25, 2025, Watermaster staff and Dudek submitted a consultation request consistent with TAC's request in its Recommendation Report dated August 27, 2024, and Watermaster's Response Report dated September 19, 2024, regarding numerical groundwater flow modeling conducted for the BOYS. On August 29, 2025, Watermaster staff and Dudek submitted a second consultation request in response to the TAC's request for clarification regarding the Basin Optimization Yield Study Model Scenario Results in an email dated August 8, 2025.

Watermaster and Dudek have completed a draft version of the Las Posas Valley Basin Optimization Yield Study, and in compliance with the provisions of the Judgment, refer said draft for committee consultation. Watermaster requests TAC recommendations or comments on the draft. Access to the draft is available through the following link: [Draft LPV Basin Optimization Yield Study](#). The Judgment affords your committee 60 days to prepare and submit recommendation reports to Watermaster. Therefore, your committee's recommendation report is due February 16, 2026.

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

Specific Comments from the Las Posas Valley Basin Policy Advisory Committee (PAC)
Draft Las Posas Valley Basin Optimization Yield Study (BOYS) - December 2025

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment
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 detail as possible, including paragraph and line whenever practicle	<i>Text from document in italics for identification</i>	Comment with as much detail as possible/necessary.
JM-1	JMenne	General Policy	Implement Calleguas In Lieu asap	26	3.1.3 - Future Projects and Water Supply	<i>Discussed in entire Section 3.1.3</i>	Efficient, tested, low risk Project to increase Basin production. PAC should continue pressing to implement this Project, hopefully to start 2026Q3 when CMWD rates are lower.
JM-2	JMenne	General Policy	Postpone Rampdown	15	3.3 - Projects Scenario	<i>Discussed in entire Section 3.3.</i>	Given the Projects Scenario yielded adequate production (36,860 AF/Y) without undesirable effects, combined with the high amount of carryover developed during the last 2 water years, postponing rampdown until the next BOYS is drafted seems reasonable and would be beneficial to the Basin's users.
JM-3	JMenne	General Policy	Communication to Stakeholders	N/A	N/A	N/A	PAC should consider ways to effectively communicate the study's findings and recommendations to educate/update the stakeholders of the LPV Water Basin performance, challenges, and what is being done by FCGMA, PAC and TAC to improve the sustainability and cost effective access to their water resource.
RG-1	Rob Grether	General Policy	Improper Introduction of "Differential Rampdown" Contrary to Judgment §4.10.3	Multiple, but Quoted Text from: - Executive Summary - v - 19	Various, but Quoted Text from: - Executive Summary - 3.4.2	<i>"In the second scenario, referred to as the Differential Rampdown Scenario, the Rampdown differed by management area."</i> <i>"although not specified in the Judgment, this BOY Study considers a Differential Rampdown Scenario..."</i>	<p>The Draft Basin Optimization Yield Study introduces a "Differential Rampdown" concept that applies non-uniform reductions in groundwater production by Management Area. This approach isnot authorized by the Judgment and misinterprets Judgment §4.10.3.</p> <p>Under the Judgment, Rampdown is a single, basinwide mechanism that adjusts the Operating Yield and Annual Allocations uniformly pursuant to Section 4.10. Section 4.10.3 does not authorize differential or Management Area-specific reductions in Allocations. Instead, it provides a separate and limited authority for Watermaster, following Committee Consultation and specific findings, to impose localized restrictions on physical Extractions from certain wells or areas where Undesirable Results are occurring or are likely to occur.</p> <p>Critically, §4.10.3 preserves Allocation rights by allowing affected Water Right Holders to extract their Annual Allocation outside the Restriction Area or to transfer Allocation Basis pursuant to Section 4.12. Localized extraction restrictions therefore regulate where groundwater may be pumped, not how much water a Water Right Holder is entitled to use.</p> <p>By framing localized extraction controls as a "Differential Rampdown," the Draft BOYS improperly conflates two distinct Judgment mechanisms and has the effect of converting site-specific extraction management into a de facto reallocation of groundwater rights, which the Judgment does not permit.</p> <p>Proposed Revision: Remove or revise all references to "Differential Rampdown" to clearly distinguish basinwide Rampdown of Allocations under Section 4.10 from localized restrictions on Extractions under Section 4.10.3, and to clarify that the Judgment does not authorize non-uniform Rampdown or differential allocation reductions by Management Area.</p>
RG-2	Rob Grether	General Editorial	Conflation of Allocation Reductions with Extraction Controls	Multiple, but Quoted Text from: - Executive Summary - v	Various, but Quoted Text from: - Executive Summary	<i>"Under this scenario, groundwater production was reduced by 3,683 AFY in the WLPMA, 4,112 AFY in the ELPMA, and 205 AFY in the Epworth Gravels Management Area."</i>	<p>The Draft BOYS frequently conflates reductions in groundwater extraction with reductions in Allocations, creating confusion regarding the legal effect of Rampdown under the Judgment.</p> <p>Under the Judgment, Allocations represent the legal entitlement to use groundwater, while extraction controls regulate where and how groundwater may be physically pumped. Rampdown adjusts the Operating Yield and resulting Annual Allocations on a basinwide basis, whereas localized extraction restrictions under Judgment §4.10.3 regulate physical pumping locations without reducing Allocation rights.</p> <p>By describing Rampdown primarily in terms of "production" or "pumping" reductions by Management Area, the Draft BOYS obscures this distinction and risks implying that Rampdown is an operational control rather than an allocation adjustment. This framing is particularly confusing for Water Right Holders whose Allocations may be exercised through alternative extraction locations, transfers, or other Judgment-authorized mechanisms.</p> <p>Proposed Revision: Revise the Draft BOYS to clearly distinguish allocation adjustments from extraction controls, and to ensure that discussion of Rampdown consistently reflects its effect on Allocations rather than physical extraction locations.</p>

Specific Comments from the Las Posas Valley Basin Policy Advisory Committee (PAC)
Draft Las Posas Valley Basin Optimization Yield Study (BOYS) - December 2025

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment
RG-3	Rob Grether	Editorial	Incorrect Definition and Calculation of Basin Optimization Yield and Rampdown	Multiple, but Quoted Text from: - Executive Summary - v	Various, but Quoted Text from: - Executive Summary	<i>“The Rampdown is the difference between the Initial Operating Yield and this Sustainable Yield.”</i>	<p>The Draft BOYS misdefines and misapplies the Judgment’s terms for Basin Optimization Yield and Rampdown, resulting in incorrect Rampdown magnitudes and Rampdown Rates.</p> <p>Under the Judgment, Rampdown is calculated as the difference between the then-effective Operating Yield and the Basin Optimization Yield, not the difference between the Initial Operating Yield and the Sustainable Yield. Judgment §4.10.1.4 expressly provides that the annual Rampdown equals the deficit between the Operating Yield (e.g., 40,000 AFY) and the Basin Optimization Yield, divided into fifteen annual increments.</p> <p>The Draft BOYS states that the Basin Optimization Yield incorporating projects is 36,860 AFY; however, it does not consistently use this value for Rampdown calculations. Applying the Judgment’s formula, the resulting Rampdown would be 3,140 AFY, with a Rampdown Rate of approximately 224 AFY. Instead, the Draft BOYS calculates Rampdown by reference to Sustainable Yield and introduces alternative “Basin Optimization Yield” sub-types, which are not provided for in the Judgment.</p> <p>The Judgment does not authorize Basin Optimization Yield formulations that exclude feasible projects. Introducing multiple BOY constructs creates confusion and leads to Rampdown calculations that are inconsistent with the Judgment.</p> <p>Proposed Revision: Revise the Draft BOYS to define and calculate Basin Optimization Yield and Rampdown strictly in accordance with Judgment §§1.21, 1.88, and 4.10.1.4, and remove alternative BOY formulations that do <u>not incorporate reasonably anticipated projects</u>.</p>
RG-4	Rob Grether	General Policy	Failure to Treat Reasonably Anticipated Basin Optimization Projects as Incorporated into BOY	Multiple, but Quoted Text from: - Executive Summary - v	Various, but Quoted Text from: - Executive Summary	<i>“The projects rely on other water agencies for implementation... coordination agreements between the agencies have not yet been drafted.”</i>	<p>The Draft BOYS understates the Basin Optimization Yield by treating Basin Optimization Projects as speculative rather than as reasonably anticipated, contrary to the Judgment’s definition of Basin Optimization Yield.</p> <p>Judgment §1.21 defines Basin Optimization Yield as incorporating “reasonably anticipated enhanced yield” projected to be available by 2040 consistent with the Basin Optimization Plan. The Judgment does not require that Basin Optimization Projects be fully implemented, contractually finalized, or guaranteed at the time of the BOY Study to be incorporated into BOY. Instead, BOY is intended to reflect a forward-looking assessment based on reasonably anticipated conditions and adaptive management.</p> <p>By emphasizing uncertainty in project coordination and timing, the Draft BOYS implicitly discounts projects that have been selected through the Basin Optimization Plan and are actively being pursued. This framing shifts the BOY analysis away from optimization and toward speculative project failure, which is inconsistent with the Judgment’s intent.</p> <p>Proposed Revision: Revise the Draft BOYS to clearly state that Basin Optimization Yield incorporates reasonably anticipated Basin Optimization Projects consistent with Judgment §1.21, and to avoid framing selected projects as speculative for purposes of BOY or Rampdown determinations.</p>
RG-5	Rob Grether	General Editorial	Inclusion of “No Projects” Scenario Not Required by the Judgment	Multiple, but Quoted Text from: - Executive Summary - v	Various, but Quoted Text from: - Executive Summary	<i>“If the projects are not implemented, the BOY Study evaluated the Rampdown, and Rampdown rate for the Basin for two scenarios.”</i>	<p>The Judgment does not require the Basin Optimization Yield Study to analyze or develop a “no projects” scenario. The purpose of the BOYS is to determine the Basin Optimization Yield, Operating Yield, and any Rampdown consistent with the Judgment and the Basin Optimization Plan, based on reasonably anticipated conditions.</p> <p>While the analysis of a “no projects” scenario is appreciated as a technical exercise and provides interesting context, it is not relevant to the determination of the BOY or Rampdown under the Judgment. Inclusion of this analysis risks creating confusion by presenting speculative outcomes that are outside the scope of the BOYS and the Judgment’s required findings.</p> <p>Proposed Revision: Clarify that the “no projects” analysis is informational only and not a basis for determining the Basin Optimization Yield or Rampdown, or remove the analysis from the BOYS to avoid confusion regarding its relevance under the Judgment.</p>

Specific Comments from the Las Posas Valley Basin Policy Advisory Committee (PAC)
Draft Las Posas Valley Basin Optimization Yield Study (BOYS) - December 2025

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment
RG-6	Rob Grether	Policy	Actual Groundwater Extractions Do Not Support Initiation of Rampdown at This Time	Multiple, but Quoted Text from: - Executive Summary - v	Various, but Quoted Text from: - Executive Summary	<i>“The Rampdown Rate, which is the annual reduction in pumping required if the Rampdown is fully implemented by the fall of 2039...”</i>	<p>Actual groundwater extractions during the first two full Water Years following implementation of the Judgment are well below both the Initial Operating Yield of 40,000 AFY and the modeled Basin Optimization Yield of 36,860 AFY. These observed conditions do not support initiation of Rampdown at this time.</p> <p>According to the Water Year 2024 Annual Report, total Basin-wide extractions were approximately26,805 AF, and according to the Draft Water Year 2025 Annual Report were approximately31,122 AF. Even under conservative assumptions that all WMIDs with incomplete reporting used their full allocations, adjusted extractions remain well below modeled yields: approximately29,889 AF for WY 2024 and 32,738 AF for WY 2025.</p> <p>The Judgment expressly conditions Rampdown on necessity. Section 4.9.1.3 provides that Rampdown shall commence “if necessary” to ensure that the Operating Yield equals the Basin Optimization Yield and Sustainable Yield by 2040. The Judgment further provides for reassessment of Rampdown through the 2030 and 2035 Basin Optimization Yield Studies (§4.10.2), and includes an additional safeguard allowing interim increases to Rampdown only if required to prevent imminent Undesirable Results (§4.10.4).</p> <p>Given the substantial margin between observed extractions and both the Initial Operating Yield and Basin Optimization Yield, the Draft BOYS should acknowledge that current conditions do not demonstrate the necessity to initiate Rampdown at this time, consistent with the Judgment’s adaptive management framework.</p> <p>Proposed Revision: Revise the Draft BOYS to explicitly consider recent extraction data and clarify that Rampdown is not presently necessary and may be reassessed in future BOY Studies pursuant to Sections 4.10.2 and 4.10.4</p>
RG-7	Rob Grether	Editorial	Modeled Minimum Threshold Exceedances Are Not Equivalent to Undesirable Results	Multiple, but Quoted Text from: - Executive Summary - v	Various, but Quoted Text from: - Executive Summary	<i>“Groundwater Production at the Initial Operating Yield was determined to be unsustainable because modeled future groundwater elevations at several Key Wells... fell below the minimum threshold groundwater elevation...”</i>	<p>The Draft BOYS treats modeled exceedances of Minimum Thresholds (MTs) as determinative of the need for Rampdown, without adequately distinguishing betweenmodeled threshold exceedances and the occurrence of actual Undesirable Results as defined in the Judgment and SGMA.</p> <p>Minimum Thresholds are planning and monitoring tools used to evaluate trends and inform management decisions. They are not, by themselves, equivalent to Undesirable Results. The Judgment defines Undesirable Results as basin conditions that are significant and unreasonable, and it provides multiple management tools—adaptive management, Basin Optimization Projects, In Lieu Water, and localized extraction restrictions—to address emerging concerns before Rampdown becomes necessary.</p> <p>As demonstrated by actual extraction data for Water Years 2024 and 2025, Basin-wide pumping has been far below both the Initial Operating Yield and the modeled Basin Optimization Yield. In this context, reliance on conservative model projections alone, particularly where acknowledged model limitations exist, does not establish that Undesirable Results are occurring or are imminent.</p> <p>By equating modeled MT exceedances with the necessity for Rampdown, the Draft BOYS collapses an adaptive management framework into a precautionary enforcement mechanism that is not required by the Judgment.</p> <p>Proposed Revision: Revise the Draft BOYS to clearly distinguish modeled MT exceedances from actual Undesirable Results, and to clarify that Rampdown is triggered by demonstrated necessity based on observed conditions and Judgment-defined findings, not by model outputs alone</p>

Specific Comments from the Las Posas Valley Basin Policy Advisory Committee (PAC)
Draft Las Posas Valley Basin Optimization Yield Study (BOYS) - December 2025

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment
RG-8	Rob Grether	General Editorial	Overstatement of Linear Rampdown Requirement to Achieve 2040 Compliance	Multiple, but Quoted Text from: - Executive Summary - v	Various, but Quoted Text from: - Executive Summary	<i>“The Rampdown Rate... required if the Rampdown is fully implemented by the fall of 2039...”</i>	<p>The Draft BOYS overstates the requirement for immediate and linear Rampdown to achieve compliance by 2040.</p> <p>The Judgment does contemplate a linear calculation method for Rampdown if Rampdown is necessary. Specifically, Judgment §4.10.1.4 provides that the amount of any required Rampdown shall be calculated by dividing the deficit between the then-effective Operating Yield and the Basin Optimization Yield into fifteen annual increments following the 2025 BOY Study. However, this provision establishes acalculation framework, not a mandate that Rampdown must begin immediately or proceed linearly in all circumstances.</p> <p>The Judgment expressly conditions Rampdown on necessity (§4.9.1.3), provides for reassessment through subsequent BOY Studies in 2030 and 2035 (§4.10.2), and allows for interim adjustments only where required to prevent imminent Undesirable Results (§4.10.4). Read together, these provisions reflect an adaptive management approach in which linear Rampdown is applied only when warranted by actual conditions and Judgment-defined findings.</p> <p>By back-solving linearly from the 2040 endpoint and presenting early Rampdown as a default pathway, the Draft BOYS risks implying an obligation that exceeds what the Judgment requires and may not reflect current basin conditions.</p> <p>Proposed Revision: Revise the Draft BOYS to clarify that while the Judgment provides a linear method for calculating Rampdown if necessary, the initiation, timing, and magnitude of Rampdown remain conditional and subject to demonstrated necessity and periodic reassessment pursuant to the Judgment</p>
DS-1	DSchwabauer	General Editorial	clarification of purchase or lease of water	8	3.1.3	<i>The Arroyo Simi-Las Posas Water Acquisition project would involve the purchase or lease of recycled water from the City of Simi Valley to continue discharging the water from its shallow dewatering wells and/or the Simi Valley Water Quality Control Plant to the Arroyo Simi for downstream recharge to the Basin (FCGMA 2025a).</i>	<p>This sentence needs further clarification as to the purchase or lease of water. Price will be extremely important. As well how long a purchase contract will/can last and/or how long a lease continue for.</p>
DS-2	DSchwabauer	General Editorial	needed validation on Epworth Gravels	13	3.2.3.1	<i>In the Epworth Gravels Management Area, simulated groundwater elevations rose throughout the 47-year model time period (Figure 3.5).</i>	<p>The beginning sentence about the Epworth Gravels is very misleading. It is well documented from historic pumping records that the Epworth Gravels water level has in general declined over the past 50 years, I say this as a pumper who has witnessed water level decline in our own wells in the Epworth.</p>
DS-3	DSchwabauer	General Editorial	impacts unknown to date	13	3.2.3.1	<i>First, not all groundwater producers with wells in the Epworth Gravels Management Area received an allocation in the Judgement (Figure 3-4).</i>	<p>The full impact of this allocation change is unknown; at this time there has not yet been a ruling by the court.</p>
DS-4	DSchwabauer	General Editorial	validation of the In-lue project	13	3.2.3.1	<i>When wells were rested in the Epworth Gravels Management Area, the groundwater elevations recovered. Both the GSP and the First Periodic Evaluation anticipated that adaptive management would occur, through pumping reductions in Epworth Gravels Management Area wells, as necessary, to maintain groundwater elevations between the minimum threshold and measurable objective.</i>	<p>From my perspective, these ending sentences clearly encapsulate the water usage patterns of the Epworth Gravels Management Area.</p> <p>The key takeaway from this resting of pumping of the Epworth Gravels clearly illustrates the benefit of the In-lue water purchase program. In my opinion, this demonstrates the high value of In-lue water usage to the basin, which benefits everyone in both the East and West Las Posas.</p>
RC-1	RCavaletto	Editorial	Number senarios evaluated.	v	Executive Summary	<i>The scenarios evaluated included. . . scenarios.</i>	<p>number each of the scenarios to make it easier to follow.</p>
RC-2	RCavaletto	Misc	Rampdown rate	v	Executive Summary	<i>4th Paragraph.</i>	<p>What happens if the projects can't be implemented for some extended time, say "5 years". Is the rampdown rate (8,000 ac/ft /9 years) still a valid approach? How long do the projects need to be active before 2039 (14 years?) to insure the 40,000 AFY Operating Yield will be valid in 2040?</p>
RC-3	RCavaletto	Misc	Rampdown period	3	1.3	<i>Rampdown was calculated over a 13-year period</i>	<p>The Executive Summary says 14 years. Which is correct?</p>
RC-4	RCavaletto	General Policy	Economic Considerations	NA	NA		<p>This was disucssed in our last PAC mtg and I believe Ian or Rob maybe drafting a statement regarding the issue of economic impacts of the different scenarios. While this report may not be the appropriate place to do the analysis, it is essential that an economic anaylis be completed for the different scenarios so water users can anticipate the additional costs they may be facing in order to meet the objective of keeping the basin operating yield at 40,000 AFY.</p>

TO: Las Posas Valley Watermaster

FROM: Las Posas Valley Watermaster Policy Advisory Committee

RE: Recommendation Report – DRAFT LAS POSAS VALLEY BASIN OPTIMIZATION YIELD STUDY

DATE: February 5, 2026

Recommendation:

See memo below for recommended changes/additions to the **DRAFT LAS POSAS VALLEY BASIN OPTIMIZATION YIELD STUDY** (December 2025).

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				
John Menne, Zone MWC				
Arturo Aseo, Commercial				
Rob Grether, West LPV Large Ag				
David Schwabauer, East LPV Large Ag				
Patty Martinez, East LPV Small Ag				
Richard Cavaletto, West LPV Small Ag				
Laurel Servin, East LPV MWC				
Steven Murata, West LPV MWC				

PAC Recommendations Report Regarding the Las Posas Valley Basin DRAFT Basin Optimization Yield Study – December 2025

On December 17, 2025, the Fox Canyon Groundwater Management Agency (FCGMA), acting as Watermaster for the Las Posas Valley Basin (LPVB), sent a Committee Consultation request to the LPVB Policy Advisory Committee (PAC) regarding the Draft Las Posas Valley Basin Optimization Yield Study (BOYS) prepared by Dudek, Inc.

Following review of the Draft BOYS, the PAC developed the recommendations in this report to ensure that the BOYS is revised and applied strictly in accordance with the Judgment and the Basin Optimization Plan. As established by the Judgment, the BOYS is an adaptive process for setting the Basin Optimization Yield, Operating Yield, and any Rampdown Rate; it is not intended to presume allocation-based Rampdown unless it is necessary to meet the Judgment's requirements.

The PAC identified policy-level issues in the Draft BOYS, including the introduction of concepts not authorized by the Judgment, the treatment of reasonably anticipated Basin Optimization Projects, the conflation of basinwide allocation adjustments with localized extraction controls, and the framing of Rampdown as a presumed outcome rather than a conditional management tool. Consistent with the Judgment's adaptive management framework, the PAC emphasizes that Basin Optimization Projects and other authorized measures must be fully considered and that Rampdown should be initiated only where necessary to ensure that the Operating Yield equals the Basin Optimization Yield by 2040.

Individual PAC member comments are compiled in the Master List appended to this Recommendations Report (to be provided to Watermaster staff in Excel format for ease of response). Those comments are keyed to specific sections of the Draft BOYS and provide detailed, section-specific input. The PAC's principal policy recommendations are summarized below.

Recommendation 1: Apply the BOYS Strictly as Defined in the Judgment; Initiate Rampdown Only Where Necessary to Achieve the 2040 Endpoint

Section 1.22 of the Judgment defines the Basin Optimization Yield Study (BOYS) as a five-year process used to set the Basin Optimization Yield, the Operating Yield, and any Rampdown Rate. The BOYS is one part of the Judgment's overall approach to achieving sustainable groundwater management by 2040.

Section 4.9.1.3 of the Judgment provides that Rampdown of the Operating Yield is to begin *if necessary* to ensure that the Operating Yield in Water Year 2040 equals both the Sustainable Yield and the Basin Optimization Yield. Sections 4.10.1.4 and 4.10.2 describe how Rampdown is to be calculated and revisited if Rampdown is required, but they do not eliminate the initial determination of whether Rampdown is needed at the time of the BOYS.

While the Judgment requires that the Operating Yield and Basin Optimization Yield align by 2040, it does not require Rampdown to begin automatically simply because the Basin Optimization Yield is lower than the current Operating Yield. Rampdown is required only where other management tools authorized by the Judgment are not sufficient to meet the 2040 requirement.

Based on current basin conditions and the status of reasonably anticipated Basin Optimization Projects, the available record does not show that starting Rampdown at this time is necessary under Section 4.9.1.3 of the Judgment.

Recommendation

Watermaster should revise and implement the BOYS in a manner that recognizes the 2040 alignment requirement, but clearly states that Rampdown should begin only if needed after considering other Judgment-authorized management tools. The BOYS should not assume Rampdown unless the need for it is clearly demonstrated.

Recommendation 2: Prioritize In-Lieu Water and Other Non-Allocational Tools Management Tools

Section 5 of the Judgment expressly authorizes the use of in-lieu water deliveries to reduce groundwater pumping while preserving water right allocations. Past basin conditions demonstrate that groundwater levels have recovered when pumping was reduced through in-lieu deliveries rather than through allocation reductions.

In-lieu water and similar non-allocational tools are efficient, lower-risk, and consistent with both the Basin Optimization Plan and the Judgment's structure, which favors operational and project-based solutions before allocation-based reductions.

Recommendation

Watermaster should prioritize implementation and use of in-lieu water deliveries and other non-allocational management tools authorized by the Judgment and should incorporate their reasonably anticipated effects into the BOYS before initiating allocation-based Rampdown.

Recommendation 3: Do Not Apply Differential Rampdown; Distinguish Allocation Changes from Extraction Controls

Under the Judgment, Rampdown is a single, basinwide mechanism that adjusts the Operating Yield and resulting Annual Allocations uniformly. Section 4.10 of the Judgment governs this process.

Section 4.10.3 of the Judgment does not authorize different Rampdown rates or allocation reductions by management area. Instead, it allows Watermaster, under specific conditions and following Committee Consultation, to impose localized restrictions on physical groundwater extraction in areas where Undesirable Results are occurring or are likely to occur.

These localized extraction restrictions regulate where groundwater may be pumped, not how much water a Water Right Holder is entitled to use. Allocation rights are preserved through the ability to pump outside the restricted area or to transfer allocation basis. Referring to these tools as "Differential Rampdown" conflates two separate mechanisms and implies a reallocation of water rights that the Judgment does not authorize.

Recommendation

Watermaster should remove or revise references to "Differential Rampdown" and clearly distinguish basinwide allocation-based Rampdown from localized extraction controls authorized

under Section 4.10.3 of the Judgment.

Recommendation 4: Base Rampdown Decisions on Demonstrated Need and Observed Basin Conditions

Actual groundwater extractions during the first two full Water Years following implementation of the Judgment have been well below both the Initial Operating Yield and the modeled Basin Optimization Yield. In this context, modeled exceedances of Minimum Thresholds should be treated as planning indicators, not as proof that Undesirable Results are occurring or imminent.

The Judgment's adaptive management approach requires that Rampdown decisions be based on demonstrated need, informed by observed basin conditions and sufficiently complete and reliable data, and revisited through future Basin Optimization Yield Studies as conditions evolve.

Recommendation

Watermaster should base any decision to initiate Rampdown on demonstrated necessity supported by observed basin conditions, rather than on speculative scenarios or model outputs alone, and should reassess the need for Rampdown through future BOYS updates consistent with the Judgment.

Conclusion

The PAC urges Watermaster to revise and implement the BOYS consistent with these recommendations so that it functions as intended under the Judgment: as an adaptive, forward-looking tool that prioritizes Basin Optimization Projects and authorized management measures, and applies Rampdown only where and when necessary to achieve sustainable groundwater management by 2040.

FOX CANYON GROUNDWATER MANAGEMENT AGENCY

LAS POSAS VALLEY WATERMASTER



MEMORANDUM

Date: January 15, 2026
To: Las Posas Valley Watermaster Policy Advisory Committee
From: Kudzai F. Kaseke, Assistant Groundwater Manager
Subject: Draft Las Posas Valley Basin Groundwater Sustainability Plan Water Year 2025 Annual Report.

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

Pursuant to Section 4.9 of the *Las Posas Valley Water Rights Coalition, et al. v. Fox Canyon Groundwater Management Agency, Santa Barbara Sup. Ct. Case No. VENC100509700* (Judgment), Watermaster shall comply with the requirements of SGMA, including developing an Annual Report each year and undertaking the GSP Updates. (Wat. Code, §§ 10728, 10728.2). The Judgment requires that the Annual Reports and GSP Updates be developed in consultation with the Technical Advisory Committee (TAC) and Policy Advisory Committee (PAC) before submission to the Department of Water Resources and the Court.

Watermaster and Dudek have completed a draft version of the Las Posas Valley Basin Groundwater Sustainability Plan Water Year 2025 (October 1, 2024, through September 30, 2025) Annual Report, and in compliance with the provisions of the Judgment, refer said draft for committee consultation. Watermaster requests PAC recommendations or comments on the draft. Access to the draft is available through the following link for the next 60 days:

[WY2025 LPVB GSP Annual Report DRAFT.pdf](#)

The Judgment, amended Watermaster Rules, affords your committee 31 days to prepare and submit recommendation reports to Watermaster. Therefore, your committee's recommendation report is due February 15, 2026.

Please contact me at 805-654-2010 or LPV.Watermaster@venturacounty.gov with any questions or concerns.

FOX CANYON GROUNDWATER MANAGEMENT AGENCY

MEMORANDUM



Date: January 28, 2026
To: Policy Advisory Committee
From: Kudzai F. Kaseke, Assistant Groundwater Manager
Subject: Request for Committee Consultation on the Las Posas Valley Basin Optimization Project, Regional Desalter Feasibility Study.

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

The Judgment requires Watermaster consider potential Basin Optimization Projects to achieve groundwater sustainability by 2040. On June 2025, Watermaster adopted the Basin Optimization Plan (BOP) with five recommended Basin Optimization Projects and cost estimates. One of the BOP recommended projects is development of a feasibility study for a regional desalter project in East Las Posas Management Area (ELPMA).

The Regional Desalter Feasibility Study project is intended to evaluate the feasibility of constructing and operating a regional groundwater desalter in the ELPMA. The preliminary concept for the regional desalter is that the produced water would be utilized by recipients in lieu of extraction. The scope of work is outlined in section 2.2.9.2 in the BOP, and the first task is *“Engagement of water purveyors in the ELPMA including CMWD, VCWWD-1, mutual water companies, and other public entities including FCGMA that may be identified, to establish the level of interest in constructing and operating a regional desalter through a joint powers authority (JPA) or other appropriate means”*.

Calleguas Municipal Water District (CMWD) and a number of its retail partners (collectively, the “Upper Calleguas Creek Desalter Study Partners” or “Study Partners”) are seeking to identify the optimal approach to brackish groundwater desalting in the upper Calleguas Creek Watershed, with CMWD serving as the lead agency. Because the ELPMA lies fully within CMWD study area and the CMWD effort already includes groundwater quantity and quality analysis, a coordinated approach will be mutually beneficial for both Watermaster and CMWD.

Watermaster staff believe that partnering with CMWD is the most efficient, cost-effective, and a strategic approach for completing the regional desalter feasibility study and advancing the basin optimization project required by the judgment. Such approach will avoid duplication of technical work, reduce costs, ensure consistent groundwater modeling and strengthen regional coordination while at the same time allowing both agencies to achieve their goals.

The Watermaster is requesting the PAC’s recommendation on whether staff should proceed with the approach of partnering with CMWD to conduct the Regional Desalter Feasibility Study?

Please provide recommendations to Watermaster by February 06, 2026.

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