

LAS POSAS VALLEY TECHNICAL ADVISORY COMMITTEE

February 10, 2026

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 Las Posas Valley Basin Groundwater Sustainability Plan Water Year 2025 Annual Report

The Las Posas Valley Watermaster Technical Advisory Committee (TAC) provides this Recommendation Report regarding the Draft Las Posas Valley Basin Groundwater Sustainability Plan Water Year 2025 Annual Report (WY 2025 Annual Report) in response to a Las Posas Valley Basin Watermaster (Watermaster) committee consultation request dated January 15, 2026. Annual reporting of groundwater conditions and progress toward sustainability are required by the Sustainable Groundwater Management Act (SGMA) and Santa Barbara Superior Court judgment in Las Posas Valley Water Rights Coalition, et al., v. Fox Canyon Groundwater Management Agency (Judgment).

The TAC discussed the WY 2025 Annual Report in a regular TAC meeting on January 20, 2026. TAC comments on the WY 2025 Annual Report were provided to the TAC Administrator by each TAC member in tabular formats and are attached to this Recommendation Report. These specific comments have been incorporated into the recommendations presented below and will be provided to the Watermaster in the original Microsoft Excel format to aid in tracking comment and recommendation responses.

The TAC reviewed this Recommendation Report and voted to approve it in a regular meeting on February 3, 2026.

TAC RECOMMENDATIONS

1. RECOMMENDATION 1: PROVIDE ADDITIONAL DETAIL REGARDING HOW CHANGE IN STORAGE ESTIMATES ARE CALCULATED

The criteria for selecting the wells used and methods applied in estimating changes in groundwater storage are unclear and should be better documented. TAC review identified apparent inconsistencies in the information presented for wells in change in storage calculations, raising questions regarding the data and methods applied to these estimates. Specifically:

- Figure 2-32 uses 07R02 to estimate change in storage for one cell, but Figure 2-19 does not show WL data for that well. How was the change in storage determined?
 - Well 06R01 was used in another cell, but Figure 2-19 shows the WL data as NA. It is unclear what data was used to estimate change in storage.
 - Notably, there are other wells in this area with water level data, including 05D01, 32H03, 27H03, 25H01, 30D01, 07K02, 08H02. These do not appear to have been used to estimate the change in storage.
- The change in groundwater level value used for well 06R01 on Figure 2-32 is inconsistent with Figures 2-18 and 2-19, which do not report a change in groundwater level for this well.
 - The 06R01 change in groundwater level value of -128.3 appears to exert a strong influence in the overall storage change result for the West Las Posas Management Area (WLPMA).
 - This value should be verified and an explanation of the source of this value should be provided and caveated, as appropriate.
- The change in groundwater level value used for well 08L03 on Figure 2-32 is inconsistent with Figures 2-18 & 2-19, which do not report a change in groundwater level for this well.
 - The value of -16.7 used is inconsistent with other wells in western WLPMA (i.e., 08G04 and 17F05), which had positive changes in groundwater levels.
 - The 08L03 change in groundwater level value of -16.7 should be reassessed as it appears to exert a strong influence in the overall storage change result for WLPMA.
 - At a minimum, an explanation of the source of this value should be provided and caveated, as appropriate.
- The change in groundwater level value used for well 10D02 of -38.2 shown on Figure 2-19 and used in the storage change calculations (Figure 2-32), does not appear to be valid as it appears to have been calculated using an anomalous value from water year 2024 (see figure for this well in Appendix A).
 - This value should be reassessed as it appears to exert a strong influence in the overall storage change result for ELPMA.
 - At a minimum, the use of this value should be flagged.
- The series of linear regressions used for estimating storage changes presented in Table 2-8 are limited to the Fox Canyon Aquifer. Consider methods that could estimate storage changes in the other Las Posas Valley Basin (LPVB) aquifers.

1.1 Recommendations:

- Provide the criteria used to select which wells are included in the estimation of storage change.
- Clearly document the methodology used in estimating storage change and how individual wells affect the estimates.
- Consider flagging wells with anomalous change in water level values and/or those that individually influence change in storage estimates for large portions of the LPVB.

- Evaluate the potential to estimate annual changes in storage in the Shallow Alluvial, Grimes Canyon, and Epworth Gravels aquifers.

1.2 Technical Rationale for Recommendation:

There are instances of disagreement between figures that include water levels and those that present changes in groundwater storage. These inconsistencies are not explained in the draft WY 2025 Annual Report and the methodology for estimating changes in groundwater storage are also not well documented. Transparent presentation of these methodologies, the criteria used in selecting what data are used, and consistent presentation of those data should be included in the annual report.

1.3 Summary of Facts in Support of Recommendation:

- Water level records for several wells used to estimate changes in groundwater storage are inconsistent between figures
- The methodology for selecting which data are used for estimating changes in groundwater storage and the methodologies applied in generating those estimates are unclear.

2. RECOMMENDATION 2: REVIEW AND CONSIDER SIGNIFICANT EDITS TO TEXT IDENTIFIED BY TAC

There are significant text edits and requests for clarification identified through the TAC review that should be considered by the Watermaster in preparation for finalizing the WY 2025 Annual Report. Specific recommendations are referenced below.

2.1 Recommendations:

- The Executive Summary indicates that resolutions, the Basin Optimization Plan, allocation system, and Basin Optimization Yield Study (BOY Study) have helped to fill data gaps. Please provide additional information regarding how these items have filled data gaps.
- Please contextualize conditions in the LPVB in relation to the BOY Study the Watermaster is working to complete along a similar timeline to the WY 2025 Annual Report. Specific discussion of the production in water year 2025 in comparison to the yield evaluations in the BOY Study would be beneficial for stakeholders.
- Section 2.1.1 references problems associated with collected water level data from well 02N21W16J03, including not being able to measure water levels in the well in water year 2025. Please explain why another well cannot take the place of well 02N21W16J03.
- Please provide a quantification of the number of non-reporting wells alluded to in section 2-2 and include assessment of how much of the overall groundwater extraction from the LPVB these non-reporting wells represent.
- The titles for Figures 2-7, 2-8, 2-20, and 2-21 indicate that the figures include groundwater elevation contours, but contours are not included on these figures. Please change the titles of these figures to reflect only the information that is included in each figure.

- Please include explanations for wells without water level measurement values on figures, like well 30M02 on Figure 2-10 and multiple WLPMA wells on Figures 2-16 and 2-17.
- Please explain why groundwater elevations reported for wells 07K02 and 08H02 were not used in contouring East Las Posas Management Area (ELPMA) groundwater levels and why wells 17F05, 08G04, and 35P02 were not used in the WLPMA.
- The comparison of water storage credits accrued by Calleguas Municipal Water District (CMWD) at the end of 2015 and the end of 2025 in section 2.4.2 highlights the fact that no water has been stored in WLPMA by CMWD since the end of 2015. Please add information regarding this change in water storage practices.
- The total water available reported in section 2.4 is actually the volume of water use. Please add an explanation that the volume of water available exceeded these amounts because imported water purchases were not capped.
- Figure 2-32 is not referenced in the text, please add a reference to this figure in section 2.6.
- On Figures 2-16 and 2-17 well 12H01 located in the WLPMA has anomalous groundwater elevations compared to surrounding wells. Please either omit or note this anomalous value and pursue additional investigation into how representative the water levels from this well are and what aquifer they should be assigned to.
- On Figure 3-2 the wells without laboratory data are shown as '0/0'. It would be clearer to label these wells with 'NA/NA' or something similar to clearly show that groundwater sample analysis was not performed on samples from these wells, and not that the laboratory results were zero.
- Discussion of annual and cumulative storage changes in the ELPMA should include footnotes and explanations alerting readers that the values are inclusive of CMWD Aquifer Storage and Recovery (ASR) storage operations; thus, the values presented are not representative of storage changes attributable to ELPMA groundwater pumping. These notes should also include explanation of why CMWD ASR water is considered stored water and what that means.
- Please provide additional discussion of the variation in water levels in comparison to Minimum Thresholds which are shown on Figure 2-19 and summarized in section 3.1.1. Are the statements that groundwater production exceeds recharge intended to describe a local condition?
- Please consider including ongoing work on the CMWD ASR project and the upcoming monitoring network evaluation in the discussion of planned activities for the upcoming water year in section 3.4.

2.2 Technical Rationale for Recommendation:

Technical rationale for each recommendation above is included in the context of the recommendation.

2.3 Summary of Facts in Support of Recommendation:

A summary of facts for this recommendation is not applicable.

3. RECOMMENDATION 3: 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 and/or recommended edits in the draft WY 2025 Annual Report.

3.1 Recommendations:

Consider revising the text to address the comments in Comment ID numbers BB-1, 2, 3, 11, 12, and 13; BA-9, 10, and 11; and TM-4 and 5.

3.2 Technical Rationale for Recommendation:

See individual editorial comments for rationale.

3.3 Summary of Facts in Support of Recommendation:

A summary of facts for this recommendation is not applicable.

4. TALLY OF COMMITTEE MEMBER VOTES

The TAC voted to approve the content of this Recommendation Report and authorize the TAC Administrator to submit it to the Watermaster in a meeting held February 3, 2026. The vote was unanimous, as shown below.

TAC Member	Vote			
	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

Specific Comments from the Las Posas Valley Basin Technical Advisory Committee, Draft WY 2025 Annual Report

Specific Comments from the Las Posas Valley Basin Technical Advisory Committee Draft WY 2025 Annual Report

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment
BB-1	Bryan Bondy	Editorial	Groundwater Production	vi & 2-6	ES & Table 2-3	N/A	Executive Summary text and Table 2-3 values of LPV production are slightly different.
BB-2	Bryan Bondy	Editorial	Groundwater Production	vi & 2-6	ES & Table 2-3	N/A	Executive Summary text says WY 25 groundwater production was ~6,000 AF higher than WY 24, but the difference between the production for these years in Table 2-3 is only 4,626 AF.
BB-3	Bryan Bondy	Editorial	Groundwater Production	vi & 2-14	ES & Table 2-8	N/A	Executive Summary text says ELPMA cumulative groundwater storage change is ~2,000 AF since 2016 while Table 2-8 says it was only 314 AF.
BB-4	Bryan Bondy	Technical	Change in Storage	N/A	Figure 2-32	N/A	The change in groundwater level value used for well 06R01 is inconsistent with Figures 2-18 & 2-19, which do not report a change in groundwater level for this well. The 06R01 change in groundwater level value of -128.3 appears to exert a strong influence in the overall storage change result for WLPMA. This value should be verified and an explanation of the source of this value should be provided and caveated, as appropriate.
BB-5	Bryan Bondy	Technical	Change in Storage	N/A	Figure 2-32	N/A	The change in groundwater level value used for well 08L03 is inconsistent with Figures 2-18 & 2-19, which do not report a change in groundwater level for this well. The value of -16.7 used is inconsistent with other wells in western WLPMA (i.e., 08G04 and 17F05), which had positive changes in groundwater levels. The 08L03 change in groundwater level value of -16.7 should be reassessed as it appears to exert a strong influence in the overall storage change result for WLPMA. At a minimum, an explanation of the source of this value should be provided and caveated, as appropriate.
BB-6	Bryan Bondy	Technical	Change in Storage	N/A	Figures 2-19 & 2-32	N/A	The change in groundwater level value used for well 10D02 of -38.2 shown on Figure 2-19 and used in the storage change calculations (Figure 2-32), does not appear to be valid as it appears to have been calculated using an anomalous value for WY 2024 (please see figure for this well in Appendix A). This value should be reassessed as it appears to exert a strong influence in the overall storage change result for ELPMA. At a minimum, the use of this value should be caveated.
BB-7	Bryan Bondy	Technical	Data Gaps	vii	ES	"These steps have helped to close data gaps identified in the GSP..."	It is unclear how the actions listed prior to the quoted text (i.e., resolutions, BOP, allocation system, and BOYS) have filled data gaps identified in the GSP.
BB-8	Bryan Bondy	Technical	ELPMA Storage	Various	Global Comment	N/A	Discussion of ELPMA annual and cumulative storage changes should be caveated to remind the reader that the values are inclusive of Calleguas ASR storage operations; thus, the values presented are not representative of storage changes attributable to ELPMA groundwater pumping.
BB-9	Bryan Bondy	Technical	Groundwater Levels	Figures 2-16 & 2-17	N/A	N/A	Well 12H01 located in the WLPMA has anomalous groundwater level elevations compared to surrounding wells, which should be noted/caveated. Further investigation is warranted to determine if groundwater levels measured in this well are representative of the Fox Canyon Aquifer.
BB-10	Bryan Bondy	Technical	Groundwater Levels	Figures 2-16 & 2-17	N/A	N/A	It is unclear why groundwater levels reported for wells 07K02 and 08H02 were not used in contouring of ELPMA groundwater levels. Same comment for wells 17F05, 08G04, and 35P02 in WLPMA.
BB-11	Bryan Bondy	Technical	Groundwater Production	vi	ES & Table 2-3	"Groundwater elevations declined from the previous water year..."	Consider adding "generally" before "declined" to recognize the fact that groundwater levels did not fall in all monitored wells.
BB-12	Bryan Bondy	Technical	Groundwater Production	N/A	Tables 2-3 & 2-6	N/A	Groundwater extraction values in Tables 2-3 and 2-6 do not agree (32,655 AF vs sum of values = 30,990 AF), a 1,665 AF difference.
BB-13	Bryan Bondy	Technical	Groundwater Production	N/A	Figures 2-28 & 2-29	N/A	The groundwater pumping bar for WY 2025 is inconsistent with the pumping value reported in Table 2-2.
BB-14	Bryan Bondy	Technical	Total Water Available	2-12	2.4	N/A	The reported total water available is actually the water that was used, which is an OK proxy, but the text should note that the actual amount of water that was available exceeded these amounts because imported water purchases were not capped.
BA-1	Bob Abrams	Technical	Improved explanation	2-1	Section 2.1.1	<i>The First Periodic Evaluation of the GSP recommended removing this well from the groundwater monitoring network, and groundwater elevations were not measured in this well in water year 2025. However, FCGMA is working toward a solution by which groundwater elevations could be measured using a sonic water level meter, albeit at a lower resolution than those measured by a direct groundwater level sounder.</i>	It would be useful to explain why another well cannot take its place, if that's the case.

Specific Comments from the Las Posas Valley Basin Technical Advisory Committee Draft WY 2025 Annual Report

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment
BA-2	Bob Abrams	Editorial	Groundwater elevation figures	2-2	Section 2.1.2.2	<i>Groundwater flow direction information is limited by the relatively small number of monitoring wells screened solely within the Epworth Gravels aquifer. In both the fall of 2024 and spring of 2025, groundwater elevations were highest in well 30M05, and lowest in well 29F06 (Figures 2-7 and 2-8).</i>	There are no contours in these figures, as stated in the figure titles. Change titles.
BA-3	Bob Abrams	Technical	Groundwater elevation figures	2-2	Section 2.1.2.2	Water year 2025 groundwater elevations in the Epworth Gravels aquifer were similar to, or slightly higher than water year 2024 groundwater elevations (Figures 2-9 and 2-10). Overall, groundwater elevations in the Epworth Gravels aquifer are higher than they were in 2015 (Figure 2-10).	Discuss the reason why is there no value for well 30M02 on Figure 2-10. It is understood that wells are not always accessible when staff arrive, but an explanation is warranted.
BA-4	Bob Abrams	Technical	Need for additional information	2-3	Section 2.1.2.4	Within the ELPMA, groundwater elevations are generally highest along Arroyo Las Posas, in the southern part of the management area, as well as along the northeastern boundary of the management area (Figures 2-16 and 2-17).	Why no measurements in several WLPMA wells in fall? It is understood that wells are not always accessible when staff arrive, but an explanation is warranted.
BA-5	Bob Abrams	Technical	Groundwater elevation figures	2-3	Section 2.1.2.5	<i>Groundwater elevation measurements in the Grimes Canyon aquifer are sparse and there are no key wells in the Grimes Canyon aquifer (Figures 2-20 and 2-21). Therefore, there are no wells with established minimum thresholds or measurable objectives against which current conditions can be evaluated.</i>	There are no contours on Figures 2-20 and 2-21. Titles should be changed.
BA-6	Bob Abrams	Technical	Need for addition information	2-3	Section 2.1.2.5		As above, there should be discussion of why there were no measurements at 19P02 in spring. And no changes in WLPMA in fall. And no changes in ELPMA in spring.
BA-7	Bob Abrams	Technical	Need for additional information	2-3	Section 2.1.3	<i>Gauge 841A, maintained by the Ventura County Watershed Protection District (VCWPD) in the Arroyo Simi, is the only current surface water monitoring point in the LPV Basin (Figure 2-25; Streamflow at Gauge 841A). The average daily flow in water year 2025 was approximately 42% of the average daily flow over the past 20 water years.</i>	Shouldn't another gage be added? This would help with annual reporting and basin sustainability. Discuss.
BA-8	Bob Abrams	Editorial	Verify number	2-7	Section 2.4.2	<i>At the end of the 2025 water year, CMWD had accrued approximately 25,192 AF of storage credits in the WLPMA...</i>	So, no ASR storage in the WIPMA since 2015? Maybe add a few words to state this?
BA-9	Bob Abrams	Editorial	Acronym needs definition	2-11	Section 2.5	<i>Similar to Tables 2-1 and 2-2, the groundwater extractions for water years 2021 and 2022 presented in Table 2-6 represent a combination of reported AMI-estimated extractions for the period from October 1, 2020, through September 30, 2022</i>	Please define AMI.
BA-10	Bob Abrams	Editorial	Figure Notes error	Figure 2-28	Section 2.6	<i>1) Storage change for water years 2016 through 2022 is estimated using the VRGWFM</i>	The figure is for the ELPMA. Wasn't the Callegaus ELP model used for this?
BA-11	Bob Abrams	Editorial	Figure Notes error	Figure 2-29	Section 2.6	<i>1) Storage change for water years 2016 through 2022 is estimated using the VRGWFM</i>	The figure is for the ELPMA. Wasn't the Callegaus ELP model used for this?
BA-12	Bob Abrams	Editorial	Figure call-out	Figure 2-32	???		There does not appear to be a figure call-out for Figure 2-32 and no discussion either (e.g., why only show change of storage for Spring 2024-2025?)
BA-13	Bob Abrams	Technical	Data for Figure 2-32	Figure 2-32	???		Where do the data come from for wells 08L03 and 06R01 on Figure 2-32? They are not shown on Figure 2-19.
BA-14	Bob Abrams	Technical	Relation to BOYS	3-4	Section 3.1.1	<i>The Watermaster is currently exploring an in-lieu surface water delivery project to reduce groundwater production in this area and allow groundwater elevations to recover to levels that are higher than the minimum thresholds.</i>	Is this in-lieu delivery project the same as the one in the BOYS? If so, would be useful to say so to avoid confusion.
TM-1	Tony Morgan	General Technical	GW elevations	vi	Exec Summary	<i>Continued declines in groundwater elevations in the WLPMA are not consistent with the sustainability goal for the LPV.</i>	The DRAFT BOYS shows several hydrographs with declining water levels for the various scenarios. Some start above the MT and end below the MT. This statement suggests that the wells with declining trends in the BOYS are not consistent with the sustainability goal of the basin?

Specific Comments from the Las Posas Valley Basin Technical Advisory Committee Draft WY 2025 Annual Report

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TM-2	Tony Morgan	Technical	basin sustainability	vi	Exec Summary	<i>Reported groundwater production from the LPV was 32,660 AF in water year 2025,</i>	Interesting that GW production in a critically dry year was less than the Operational Yield of 40,000 AFY and is within the range of the sustainable yield of 30,630+/- 3,500? AFY of the baseline scenario in BOYS (Table 3-2).
TM-3	Tony Morgan	Technical	GW production	2-4	2-2	<i>...and do not include estimates of extractions from non-reporting wells based on AMI data</i>	Probably useful to quantify the number of non-reporting wells in the text and provide their estimated groundwater production. Are the non-reporting wells thought to account for <1% of the overall groundwater extractions or is it more significant?
TM-4	Tony Morgan	General Editorial	editorial	2-4	2-2	<i>The estimated sustainable yield of the WLPMA ranges from approximately 10,200 to 12,600 AFY (FCGMA 2024). The estimated sustainable yield of the ELPMA ranges from approximately 16,900 to 21,500 AFY (FCGMA 2024).</i>	are these citations FCGMA 2024a or 2024b?
TM-5	Tony Morgan	General Editorial	editorial	2-10	2.4.2	<i>Table 2-5</i>	Rounding errors(?) in Table 2-5. See net injection totals for CY2018, 2019, 2020, WY2024, WY2025
TM-6	Tony Morgan	Technical	CMWD injections	2-11	2.5	<i>b Total water available in the LPV does not include CMWD ASR injections which are considered stored water in the ELPMA.</i>	Why are the CMWD injections not considered "available" in LPB? Aren't those waters are available to CMWD?
TM-7	Tony Morgan	Technical	Table 2-8	2-14	2.6.1.2	<i>The series of linear regressions are limited to the FCA.</i>	Is it possible to provide an estimate of the storage change for the other aquifers by comparing similar water year types in the 2016-2022 and providing an inferred general range ? For example, Dry Years 2016 and 2018 showed -237 and -296 AF in the GC aquifer, so maybe a range of -240 to -300 AF would work for this table. Keep it simple, round the values to nearest 10 AF. Couldn't we further flesh out Table 2-8 with these ranges? They would need to have footnotes to explain how they were derived, but would provide a more complete picture albeit with some educated guestimates. See separate sheet for example values.
TM-8	Tony Morgan	Technical	groundwater production v. recharge	3-4	3.1.1	<i>...and likely reflects groundwater production that exceeds groundwater recharge</i>	Per Fig. 2-19 other nearest monitored wells are at or above the their respective MTs. Does this suggest that the "...groundwater production...exceeds groundwater recharge..." is only a localized hydrogeologic condition and not indicative of the overall conditions of the basin?
TM-9	Tony Morgan	Technical	change in groundwater storage	5-37	Figure 2-32		Figure 2-32 uses 07R02 to estimate change in storage for one cell, but Figure 2-19 does not show WL data for that well. How was the change in storage determined? Well 06R01 was used in another cell, but Figure 2-19 shows the WL data as NA. Where did the data to estimate change in storage come from? Why were other wells with WL data (e.g., 05D01, 32H03, 27H03, 25H01, 30D01, 07K02, 08H02) apparently not used to compute the change in storage? Suggest including the criteria used to select wells used to estimate change in storage.
TM-10	Tony Morgan	Technical	Nitrate		Figure 3-2		Figure 3-2 - the wells lacking lab data are shown as 0/0. Suggest relabeling them as NA/NA to reflect that the groundwater was not analyzed from this well, not that the lab result was zero.
TM-11	Tony Morgan	Technical	Upcoming Activities	3-6	3.4	<i>Planned Activities for the Upcoming Water Year</i>	Should the Calleguas ASR Project Operations Plan be included? How about the monitoring / data gaps plan?
TM-12	Tony Morgan	Technical	Representative Monitoring Wells	3-2	3.1.1	<i>Table 3-1</i>	No WLS reported for 16J03. This warrants an explanation in the text as to why WLS were not collected and what is being done to minimize the potential for this happening again.