LAS POSAS VALLEY WATERMASTER RESPONSE REPORT

Date: March 15, 2026

To: Las Posas Valley Watermaster Board of Directors

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

Re: Response Report to TAC Recommendation Report – Draft Las Posas Valley Basin Groundwater Sustainability Plan Water Year 2025 Annual Report

The Las Posas Valley Watermaster (Watermaster) requested consultation from the Las Posas Valley Technical Advisory Committee (TAC) on the Draft Las Posas Valley Basin Groundwater Sustainability Plan (GSP) Water Year 2025 Annual Report. The Watermaster requested consultation in a memo to TAC dated January 15, 2026.

The TAC discussed and developed its recommendation report at January 20 and February 3, 2026, meetings. TAC's February 10, 2026 recommendation report included three recommendations and an attachment with 40 comments by each of the TAC members on specific sections of the draft Annual Report. Each of these recommendations is listed below followed by Watermaster's response. Watermaster's responses to the specific recommendations are attached.

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 and 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.

Response to Recommendation 1:

The methodology used to estimate storage change, and the criteria used to select the wells used in that estimation, were detailed in an appendix to the Annual Report submitted to DWR in 2022 and cited in the Water Year 2025 Annual Report. In general, a series of Thiessen Polygons was generated to define areas surrounding the representative monitoring sites, or key wells. In the ELPMA, nine key wells are screened solely within

the Fox Canyon aquifer, which provide sufficient spatial discretization to generate storage change estimates. In the WLPMA, however, only three key wells are screened solely within the Fox Canyon aquifer. In order to estimate storage change within smaller polygons, an additional four wells screened solely in the Fox Canyon aquifer were incorporated into the storage change network. These wells were selected based on the strength of the correlation between groundwater elevations measured in the well and those measured at the closest key well.

At the time the storage change methodology was developed, Watermaster reviewed the potential to estimate annual changes in storage in the Shallow Alluvial, Grimes Canyon, and Epworth Gravels aquifers. There are few wells screened in these aquifers, and the relationship between storage change and water year type is insufficiently defined to make estimates of storage change in these aquifers reliable. As the monitoring network is further developed, these assumptions should be revisited.

As noted in the First Periodic Evaluation of the GSP, Watermaster is working to formalize agreements with other local agencies to ensure groundwater levels are measured routinely in both the fall and spring of each year. In water year 2025, however, not every well was measured within the spring measurement window. For instances where a well was not measured within that window, storage change was estimated by correlating the observed change at a nearby well to an estimated change at the monitoring well. The text and figures of the annual report have been updated to clarify this approach and address TAC comments. In particular, the text has been updated to note when an anomalous change in water level may influence the estimation of storage change and the figures have been changed to note which wells were used in the calculations.

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.

Response to Recommendation 2:
The bulleted recommendations and requests for clarification listed under Recommendation #2 are excerpted from the specific technical comments provided by TAC members in the tabulated comments at the end of the recommendation report. Watermaster has reviewed the text edits and requests for clarification identified by TAC members and made edits to clarify the text, tables, and figures of the Annual Report. Detailed responses to each of the TAC member comments are included in the attached table.

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 Recommendation:

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.

Response to Recommendation 3:
The text, tables, and figures of the Annual Report 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 WY 2025 Annual Report

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment	Watermaster Response
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.	ES discussion corrected to match table.
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.	ES discussion corrected.
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.	ES discussion corrected.
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.	Because groundwater elevations have not been consistently measured within the spring and fall measurement windows at several wells in the WLPMA, correlations were developed to project WLs from adjacent wells to wells used for the storage change calculation. This was done, instead of changing the polygons each year, to try to generate a stable set of estimated storage change areas for comparison to previous years. A paragraph has been added to the text to note this, and the water level correlation wells are noted on Figure 2-32. The spring 2024 groundwater elevation was not measured at well 06R01, which is why it isn't reported in Table 3-1 or shown on figures 2-18 or 2-19. A change in *estimated* water level between spring 2024 and spring 2025 is generated based on the water level correlations with nearby wells. This projected level is then used to estimate change in storage for the annual report.
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.	Same explanation as above. In this case the spring 2024 and 2025 groundwater elevations were not measured at well 08L03 which is why it isn't shown on figures 2-18 or 2-19. A change in estimated water level between spring 2024 and spring 2025 is generated based on the water level correlations with nearby wells. This projected level is then used to estimate change in storage for the annual report.
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 and 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.	A note has been added to the text.
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.	Sentence has been revised

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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.	Paragraph added to section 2.6.1.2
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.	Groundwater elevations have been re-contoured.
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.	Groundwater elevations have been re-contoured.
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.	Added "generally" to the executive summary. Did not see an appropriate addition in Table 2-3.
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.	Table 2-6 has been corrected.
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.	The figures have been updated.
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.	This is DWR 's terminology and is required under the regs.
BA-1	Bob Abrams	Technical	Improved explanation	*2-1*	*Section 2.1.1*	*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.*	It would useful to explain why another well cannot take its place, if that's the case.	There are limited wells with known screen intervals and long-term groundwater elevation records in the central WLPMA. This well was chosen based on a review of all the groundwater elevation records at the time the GSP was prepared. Selection of the representative monitoring points, or key wells, is discussed in the GSP. As funding becomes available, Watermaster will investigate opportunities to add dedicated monitoring wells to the LPV Basin.
BA-2	Bob Abrams	Editorial	Groundwater elevation figures	2-2	Section 2.1.2.2	*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).*	There are no contours in these figures, as stated in the figure titles. Change titles.	Contour maps are required by the GSP regulations. Watermaster is working to formalize agreements with partner agencies to improve collection of groundwater monitoring data for inclusion in future reports.

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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.	The map has been corrected to show that there was no change between spring 2024 and spring 2025.
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.	Several wells are shown on the map as part of the broader monitoring network, but either are either not monitored regularly by CMWD, UWCD, or VCWPD, or have not been monitored in several years because of issues with the well. For instance CMWD reports that Well 32H02 has been dry, or had too little water to install a transducer since 2020. It is still shown on the maps in the event that groundwater elevations recover and this well can be measured again. A note has been added to Table 3-1 for all key wells that were not measured explaining why a key well was not measured during the monitoring period.
BA-5	Bob Abrams	Technical	Groundwater elevation figures	2-3	Section 2.1.2.5	*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.*	There are no contours on Figures 2-20 and 2-21. Titles should be changed.	Contour maps are required by the GSP regulations. Watermaster is working to formalize agreements with partner agencies to improve collection of groundwater monitoring data for inclusion in future reports. Additional data collection will allow for contouring in the future.
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 WLMPA in fall. And no changes in ELMPA in spring.	Well 19P02, which is part of the broader monitoring network but is not a key well, was pumping in the spring. The change in groundwater levels could not be reported for wells 28A02 or 22G01 because those wells were not measured during the corresponding time period in WY 2024. These wells are also part of the monitoring network, but are not key wells. Watermaster is working to formalize agreements with partner agencies to improve collection of groundwater monitoring data for inclusion in future reports.
BA-7	Bob Abrams	Technical	Need for additional information	2-3	Section 2.1.3	*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.*	Shouldn't another gage be added? This would help with annual reporting and basin sustainability. Discuss.	The number of surface water gauges wasn't identified as a data gap in the GSP. The discussion in the annual report is primarily to report water year hydrologic conditions as a setting for the basin conditions. Surface water studies have indicated that flow into and out of the Arroyo is complex and maintaining long-term records is challenging in an environment where the channel changes frequently (REF HERE). Before adding more stream gauges, additional work would need to be

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BA-8	Bob Abrams	Editorial	Verify number	2-7	Section 2.4.2	*At the end of the 2025 water year, CMWD had accrued approximately 25,192 AF of storage credits in the WLPMA...*	So, no ASR storage in the WlPMA since 2015? Maybe add a few words to state this?	A note has been added to the text indicating that CMWD has not delivered imported water in-lieu of groundwater pumping to the ELPMA or WLPMA since 2016.
BA-9	Bob Abrams	Editorial	Acronym needs definition	2-11	Section 2.5	*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*	Please define AMI.	AMI is defined in the text - Section 2.2 Groundwater Extraction
BA-10	Bob Abrams	Editorial	Figure Notes error	Figure 2-28	Section 2.6	*1) Storage change for water years 2016 through 2022 is estimated using the VRGWFM*	The figure is for the ELPMA. Wasn't the Callegaus ELP model used for this?	Figure note has been revised to reference the correct model.
BA-11	Bob Abrams	Editorial	Figure Notes error	Figure 2-29	Section 2.6	*1) Storage change for water years 2016 through 2022 is estimated using the VRGWFM*	The figure is for the ELPMA. Wasn't the Callegaus ELP model used for this?	Figure note has been revised to reference the correct model.
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?)	The figure call out has been added. This figure is required by the SGMA regulations.
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.	Because groundwater elevations have not been consistently measured within the spring and fall measurement windows at several wells in the WLPMA, correlations were developed to project WLs from adjacent wells to wells used for the storage change calculation. This was done, instead of changing the polygons each year, to try to generate a stable set of estimated storage change areas for comparison to previous years. A paragraph has been added to the text to note this, and the water level correlation wells are noted on Figure 2-32.
BA-14	Bob Abrams	Technical	Relation to BOYS	3-4	Section 3.1.1	*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.*	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.	A footnote has been added to the text.
TM-1	Tony Morgan	General Technical	GW elevations	vi	Exec Summary	*Continued declines in groundwater elevations in the WLPMA are not consistent with the sustainability goal for the LPV.*	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?	The hydrographs in the BOY Study are modeled estimates of future conditions in both the WLPMA and ELPMA under different groundwater pumping scenarios. These scenarios indicated the anticipated decline in groundwater elevations that may occur at different pumping rates, and showed the groundwater production rates for which groundwater elevations are likely to remain above the minimum threshold. The BOY study used a less constrained evaluation of the future simulated groundwater elevation taking into consideration the uncertainties in the model. However, the BOY Study clearly states that the measured groundwater levels are the criteria for evaluating sustainability in the LPV Basin. Further, the BOY Study does not set a sustainability goal for the LPV

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TM-2	Tony Morgan	Technical	basin sustainability	vi	Exec Summary	*Reported groundwater production from the LPV was 32,660 AF in water year 2025,*	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).	Comment noted. As stated in the annual report, the reported groundwater production is based on that received by FCGMA by January 26, 2026. This production is likely to be revised in the WY 2026 annual report.
TM-3	Tony Morgan	Technical	GW production	2-4	2-2	*...and do not include estimates of extractions from non-reporting wells based on AMI data*	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?	The first paragraph of section 2-2 and Table 2-1 state that pumping reports have been received from approximately 86% of the operators in the Basin.
TM-4	Tony Morgan	General Editorial	editorial	2-4	2-2	*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).*	are these citations FCGMA 2024a or 2024b?	Citation has been changed to FCGMA 2024 universally and the references have been updated.
TM-5	Tony Morgan	General Editorial	editorial	2-10	2.4.2	*Table 2-5*	Rounding errors(?) in Table 2-5. See net injection totals for CY2018, 2019, 2020, WY2024, WY2025	The table has been corrected to eliminate the rounding errors.
TM-6	Tony Morgan	Technical	CMWD injections	2-11	2.5	*b Total water available in the LPV does not include CMWD ASR injections which are considered stored water in the ELPMA.*	Why are the CMWD injections not considered "available" in LPB? Aren't those waters are available to CMWD?	Those waters are stored by CMWD for emergency purposes. They are not generally "available" in the context of available water. We'll have a better understanding of CMWD's planned operations into the future once the CMWD ASR Study Group prepares its report.
TM-7	Tony Morgan	Technical	Table 2-8	2-14	2.6.1.2	*The series of linear regressions are limited to the FCA.*	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.	The three aquifers for which we rely on the model to produce an estimate of groundwater storage change have limited wells, and limited production. While we could estimate the storage change based on water year type, the water year type does not always match the observed water level change, in part because the observations are limited and changes in operation of just a handful of wells, independent of water year type, can influence the estimate of the storage change. A note has been added to the text stating that the change in storage in the Shallow Alluvial, Grimes Canyon, and Epworth Gravels aquifers typically accounts for 10 to 30% of the total modeled change in storage for water years 2016-2022.
TM-8	Tony Morgan	Technical	groundwater production v. recharge	3-4	3.1.1	*...and likely reflects groundwater production that exceeds groundwater recharge*	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?	Even localized hydrogeologic conditions can cause undesirable results. The GSP defined undesirable results in 2 ways - the first is with a total number of wells in the management areas that are below an MT. The second is a length of time a single well can be below the MT.

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Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment	Watermaster Response
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.	Because groundwater elevations have not been consistently measured within the spring and fall measurement windows at several wells in the WLPMA, correlations were developed to project WLs from adjacent wells to wells used for the storage change calculation. This was done, instead of changing the polygons each year, to try to generate a stable set of estimated storage change areas for comparison to previous years. A paragraph has been added to the text to note this, and the water level correlation wells are noted on Figure 2-32.
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.	The figure has been revised.
TM-11	Tony Morgan	Technical	Upcoming Activities	3-6	3.4	*Planned Activities for the Upcoming Water Year*	Should the Calleguas ASR Project Operations Plan be included? How about the monitoring / data gaps plan?	The Calleguas ASR Project Operations Plan is not a watermaster activity. CMWD is leading the development of that plan with Watermaster participation. While the Calleguas ASR Study Group has formed, it is not clear when the study will be ready.
TM-12	Tony Morgan	Technical	Representative Monitoring Wells	3-2	3.1.1	*Table 3-1*	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.	Well 16J03 is discussed in section 2.1.1