Fox Canyon Groundwater Management Agency

AGENDA PACKAGE

Board Regular Meeting
of
April 22, 2026

FOX CANYON GROUNDWATER MANAGEMENT AGENCY

A STATE OF CALIFORNIA WATER AGENCY

NOTICE OF MEETING

NOTICE IS HEREBY GIVEN that the Fox Canyon Groundwater Management Agency (FCGMA) Board of Directors will hold a **Board Hybrid Meeting** at **12:30 P.M.** on **Wednesday, April 22, 2026**, in the **Board of Supervisors Hearing Room and via Zoom**, at the Ventura County Government Center, Hall of Administration, at **800 South Victoria Avenue**, **Ventura**, **California**.

To attend the public portion of the meeting via Zoom, click here:
https://us02web.zoom.us/j/89139780163?pwd=jQR3idpgKDszd4g3GFm5tmfaWYy1xV.1
Passcode: 550681

FCGMA BOARD REGULAR MEETING AGENDA

April 22, 2026
12:30 P.M.

Welcome to the meeting of the Fox Canyon Groundwater Management Agency Board of Directors, also sitting as watermaster for the Las Posas Valley Basin and the groundwater sustainability agency for the Las Posas Valley Basin, the Pleasant Valley Basin, and the Oxnard Subbasin. In compliance with the Americans with Disabilities Act, all possible accommodations will be made for individuals with disabilities so they may attend and participate in meetings. If special assistance is needed, please call Agency staff at (805) 654-2014 at least 24 hours prior to the meeting so proper arrangements may be assured. If requested, and as possible, Agendas will be provided in alternative formats.

Agenda items are numbered for identification purposes only and may not necessarily be considered in this order. Agenda items are grouped under Las Posas Valley Watermaster (LPV Watermaster) or under Fox Canyon Groundwater Management Agency (FCGMA), if the item directly applies only to that entity. The Board reserves the right to limit each speaker to five (5) minutes per subject or topic if necessary. The public portion of every public meeting of the Board of Directors is recorded. Please see the "STANDING NOTICES" section at the end of this Agenda for more information, including hybrid attendance and public participation.

OPENING

1. **Call to Order** – The Board Chair will call the meeting to order.

2. **Pledge of Allegiance** – A Board member will lead the Pledge of Allegiance.

3. **Roll Call** – Attending Board members, alternates, and staff will be recorded by the Board Clerk.

4. **Agenda Review** – Consider and approve by majority vote, any minor revisions to Board Agenda items and/or attachments and any item(s) added or removed from this Agenda.

5. **Public Comments** – Members of the Public may speak about Agency-related matters not on today's Agenda. California State law does not allow any response or action from the Board concerning non-Agenda topics at this time; however, topics can be placed on future Agendas or referred to staff. Please come to the podium and state your name and affiliation for the record before commenting on any particular subject.

6. **Executive Officer's Comments** – Brief announcements and administrative report on Agency workforce activities.

7. **Board Member Comments** – An opportunity for Board Members to make comments or to communicate with other directors, staff, and/or the public regarding non-Agenda topics.

CONSENT AGENDA

Routine items are placed under the Consent portion of this Agenda and need only be reviewed and approved by one single motion via roll call vote. Consent items generally require no discussion; however, they may be debated or voted on by moving them to the "Regular Agenda" portion at the Board's discretion.

8. **Approval of Minutes** – *(New Item)* **RECOMMENDATION:** Approve minutes of the March 25, 2026, Board Regular meeting.

CONSENT AGENDA – FCGMA Items

9. **FCGMA Financial Status Report for March 2026** – *(New Item)*
RECOMMENDATION: Receive and file the monthly financial report.

CONSENT AGENDA – LPV Watermaster Items

10. **LPV Watermaster Financial Status Report for March 2026** – *(New Item)*
RECOMMENDATION: Receive and file the monthly financial report.

REGULAR AGENDA

Regular Agenda items are heard at the Board's discretion and may be heard at any time during the meeting.

REGULAR AGENDA – FCGMA Items

11. **Adoption of FCGMA Fiscal Reserve Policy** – *(New Item)* **RECOMMENDATION:** Adopt Fiscal Reserve Policy.

12. **Adoption of Proposed Resolution No. 2026-02, A Resolution Increasing the Tiered Groundwater Surcharge Rates** – *(Returning Item)* **RECOMMENDATIONS: (1)** Receive an Agency staff presentation regarding increasing tiered groundwater extraction surcharge rates; and **(2)** Adopt Resolution No. 2026-02, approving increased tiered groundwater extraction surcharge rates consistent with Calleguas Municipal Water District's rate increase, effective January 1, 2026.

13. **Presentation of the 2026 John K. Flynn Groundwater Stewardship Award** – (*New Item*) **RECOMMENDATION:** The Board will announce the recipient of the John K. Flynn Groundwater Stewardship Award for 2026.

REGULAR AGENDA – LPV Watermaster Items

14. **Presentation on Watermaster Allocations Accounting for Water Year 2024-25 and Overuse Assessments for Water Year 2023-24** – *(Returning Item)* **RECOMMENDATION:** Receive and file a presentation on Carryover and Overuse in the Las Posas Valley Basin.

15. **Presentation and Discussion on Adjustments to Basin Assessments for Water Right Holders Subject to United Water Conservation District Assessments** – *(New Item)* **RECOMMENDATIONS: (1)** Receive and file a presentation from Agency staff on Las Posas Valley Adjudication Judgment provisions authorizing adjustments to Basin Assessments for Water Right Holders subject to United Water Conservation District Assessments; and **(2)** Discuss and provide direction and policy to Agency Staff on how Basin Optimization Project Assessment adjustments should be implemented, retroactively and in the future.

16. **Presentation on Preparation of a Regional Desalter Feasibility Study and Collaboration with Calleguas Municipal Water District** – *(New Item)* **RECOMMENDATION:** Receive and file an Agency staff presentation on preparation of a Regional Desalter Feasibility Study and Collaboration with Calleguas Municipal Water District.

17. **Receive and File a Presentation on the Las Posas Valley Draft Basin Optimization Yield Study** – *(Returning Item)* **RECOMMENDATIONS: (1)** Receive and file a presentation from Agency staff on the draft Las Posas Valley Basin Optimization Yield Study, and **(2)** Provide direction to staff.

18. **Continued Hearing on Green Hills Ranch Well Drilling Permit Application** – *(Returning Item)* **RECOMMENDATIONS: (1)** Conduct continued hearing on Green Hills Ranch Well Drilling Permit Application; and **(2)** Approve the Green Hills Ranch Well Drilling Permit Application subject to specified conditions.

CLOSED SESSION AGENDA

Discussions of Closed Session Agenda items are closed to the public. The Chair will announce when the Board is going into closed session. Closed session items may be heard at any time during the meeting.

19. **CONFERENCE WITH LEGAL COUNSEL – EXISTING LITIGATION (Gov. Code, §54956.9) PURSUANT TO GOVERNMENT CODE SECTION 54956.9, SUBDIVISION (d), PARAGRAPH (1): NAME OF CASE**: City of Oxnard v. Fox Canyon Groundwater Management Agency, Los Angeles County Superior Court Case No. 20STCP00929

20. **CONFERENCE WITH LEGAL COUNSEL – EXISTING LITIGATION (Gov. Code, §54956.9) PURSUANT TO GOVERNMENT CODE SECTION 54956.9, SUBDIVISION (d), PARAGRAPH (1): NAME OF CASE:** Las Posas Valley Water Rights Coalition v. Fox Canyon Groundwater Management Agency, Santa Barbara County Superior Court Case No. VENCI0059700

21. **CONFERENCE WITH LEGAL COUNSEL – EXISTING LITIGATION (Gov. Code, §54956.9) PURSUANT TO GOVERNMENT CODE SECTION 54956.9, SUBDIVISION (d), PARAGRAPH (1): NAME OF CASE:** OPV Coalition et al v. Fox Canyon Groundwater Management Agency, Santa Barbara County Superior Court Case No. VENCI00555357

22. **Adjourn Board Meeting.**

STANDING NOTICES

The FCGMA Board strives to conduct accessible, orderly, and fair meetings where everyone can be heard on the issues. The Board Chair will conduct the meeting and establish appropriate rules and time limitations for each item. The Board can only act on items designated as action Items. Action items on the Agenda are staff proposals and may be modified by the Board as a result of public comment or Board member input.

Public Comment: Public comment is the opportunity for members of the public to participate in meetings by addressing the Fox Canyon Board of Directors in connection with one or more Agenda or non-Agenda items.
The following options allow for public participation:

1. Join the Zoom Meeting as an Attendee:
   https://us02web.zoom.us/j/89139780163?pwd=jQR3idpgKDszd4g3GFm5tmfaWYy1xV.1
   Passcode:550681
   Webinar ID: 891 3978 0163
   With this option you will be able to raise your hand, and the Clerk of the Board will give you speaking abilities to make a public comment. If you experience technical difficulties during attendance that impact your ability to hear or see meeting proceedings, please contact the host via chat, or raise your hand for Q&A inside the Zoom Client. If you are unable to contact the host via the Zoom Client's chat or Q&A features, please call (805) 654-2014 and report the issue, then consider submitting written comment according to option 4, below.

2. During meetings held in the Board of Supervisors Boardroom, we have access to livestreaming capabilities. Observe the Board of Directors meeting streaming live by navigating to the "Current and Upcoming Meetings" section of our website and clicking on the video icon button next to the meeting listing at: https://fcgma.org/board-agendas-broadcasts-minutes/. *This option is currently only available for meetings held in the BOS Boardroom.*

3. Call in to listen to the meeting:
   +1 669 900 6833 US (San Jose)
   +1 408 638 0968 US (San Jose)
   +1 669 444 9171 US
   +1 253 215 8782 US (Tacoma)
   +1 346 248 7799 US (Houston)
   +1 719 359 4580 US
   +1 253 205 0468 US
   +1 507 473 4847 US
   +1 564 217 2000 US
   +1 646 876 9923 US (New York)
   +1 646 931 3860 US
   +1 689 278 1000 US
   +1 301 715 8592 US (Washington DC)
   +1 305 224 1968 US
   +1 309 205 3325 US
   +1 312 626 6799 US (Chicago)
   +1 360 209 5623 US
   +1 386 347 5053 US
   Webinar ID: 891 3978 0163
   Passcode: 550681
   Options 2 and 3 will not allow you to make direct speaking comments. If you wish to make a written comment, please follow the steps below. Every effort will be made to read your comment into the record, but some comments may not be read due to time limitations. Comments received after an Agenda item will be made part of the record if received prior to the end of the meeting.

4. If you wish to make a written comment on a specific Agenda item, please submit your comment via email by 5:00 p.m. on the Monday prior to the Board regular meeting. Please submit your comment to the Clerk of the Board at FCGMA@venturacounty.gov. Please indicate in the subject line of your email the Agenda item number (e.g., Item 9). Your comment will be read by the Board of Directors and placed into the record.

5. If you are listening or watching the live stream of the Board meeting and would like to make either a general public comment (see Item 5) for items not on the day's Agenda or to comment on a specific Agenda item as it is being heard, please submit your comment via email to the Clerk of the Board at FCGMA@venturacounty.gov. Please indicate in the email subject line the Agenda item number (e.g., Item 9).

Administrative Record: Material presented as part of testimony will be made part of the Agency's record, and 10 copies should be left with the Board Clerk. This includes memos, presentations, maps, etc. If possible, in advance of the meeting, email PDFs to FCGMA@venturacounty.gov and indicate the related Agenda item number in your email's subject line.
***

ADA Accommodations: Persons who require accommodation for any audio, visual, or other disability in order to review an Agenda or to participate in the Board of Directors meeting per the Americans with Disabilities Act (ADA), may request such accommodation in writing addressed to the Clerk of the FCGMA Board, 800 So. Victoria Avenue, Location #1610, Ventura, CA 93009-1610, via email to FCGMA@venturacounty.gov, or via telephone by calling (805) 654-2014. Any such request should be made at least 48 hours prior to the meeting so staff can make the necessary arrangements.
***

Availability of Complete Agenda Package: A copy of the complete Agenda package is available for examination at the FCGMA office during regular working hours (8:00 a.m. to 5:00 p.m. Monday through Friday) beginning 72 hours before the regular Board meeting. Agenda packet contents are also posted on the FCGMA website as soon as possible and left there for archival retrieval in case reference is needed on previously considered matters. Questions about specific Agenda items should be directed to the Agency's Executive Officer by emailing FCGMA@venturacounty.gov.
***

Continuance of Items: The Board will endeavor to consider all matters listed on this Agenda. However, time may not allow the Board to hear all matters listed. Matters not heard at this meeting may be carried over to the next Board meeting or to a future Board meeting. Participating individuals or parties will be notified of the rescheduling of their item prior to the meeting. Please contact the Agency Clerk to find out about rescheduled items.
***

The Ralph M. Brown Act: It is the intent of the law that the actions of this Board be taken openly and that their deliberations be conducted openly. Read about the Ralph M. Brown Act via this link: https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?chapter=9.&division=2.&lawCode=GOV&part=1.&title=5.
***

Agency Information and Updates: Our website address is https://fcgma.org/. Information available includes meeting materials and schedules, Agency Ordinances, Resolutions, reports, forms, and more. FCGMA Board Regular meetings occur on the fourth Wednesday of the month, unless otherwise noted. If you would like to be added to our agenda notification email list, or to speak to a staff member, please contact the FCGMA Clerk of the Board via telephone at (805) 654-2014 or via email at FCGMA@venturacounty.gov.

FOX CANYON GROUNDWATER MANAGEMENT AGENCY

A STATE OF CALIFORNIA WATER AGENCY

April 22, 2026

SUBJECT: **Executive Officer's Report Dashboard** – *(Returning Item)*

RECOMMENDATION: Receive and file this informational report.

FCGMA Reporting

- To date, 17 "change of well owner" registrations and 13 "change of operator" registrations have been completed this calendar year.
- 2026-1 Semi-Annual Extraction Statements (SAES) were released for viewing online on 3/27/2026 and opened for online submittals on 4/1/2026. Printed copies were mailed on 3/30/2026. 2026-1 SAES are due 5/15/2026.
  - As of 4/15/2026, approximately 20% of reporting has been submitted; FCGMA has processed approximately $31,000 in 2026-1 SAES payments for 27 CombCodes.
  - Of the reporting received, 60% was submitted online while the remaining 40% was submitted via a combination of mailed handwritten paper submissions, emailed scanned submittals, or walk-in submissions.
- The number of online submittals received is steadily increasing with each reporting period, due to staff working closely with operators to clear up incomplete reporting preventing online submissions.

Flowmeters

- On 2/26/2026, 152 wells were issued Notices to Calibrate a Flowmeter. Notices were sent to both well operators and their respective owners. A total of 304 notices were mailed and emailed to email addresses on record.
  - As of 4/15/2026, 57 (37.5%) of the wells issued a calibration notice have responded; 36 processed and 21in queue for processing.
  - Of the 304 notices mailed, 79 were returned to the Agency undelivered due to outdated user provided mailing addresses or refusal to sign for Registered Mail.

RFP Solicitations

- Two Open RFPs: FCGMA is currently requesting proposals from qualified firms to provide technical consulting services for two unique projects in the Las Posas Valley Basin. Read more about the Agency's open RPFs at https://fcgma.org/agency-rfps/.

Watermaster Basin Assessments

- The second installment of the Water Year 2025 (10/1/2025-9/30/2026) initial Basin Assessment (2025-2 BAs) was due 2/2/2026 and will be considered delinquent if not received by 3/1/2026. Delinquent BAs shall bear interest as provided by the LPV Judgment.
  - On 3/11/2026, 33 WMIDs were issued a first delinquency notice; on 3/20/2026, 31 WMIDs received a final delinquency notice with further enforcement. Staff will work with counsel on next enforcement action.
- A Basin Assessment Delinquency List, current as of 4/15/2026, is available online at https://fcgma.org/annual-allocations_lpv/ and by selecting the corresponding Water Year from the dropdown.
- 2025-3 BAs were released on 4/1/2026 and are due 5/1/2026 at the rate of $16.82 per acre-foot (AF) Allocation ($15/AF for Basin Assessment + $1.82/AF Allocation for Basin Optimization Projects Assessment.) 2025-3 BAs will be considered delinquent if not received by 6/1/2026.

LPV Extraction & Use Reporting

- Groundwater and Extraction Use Reporting has been administered since 2023 by an outside consultant. Watermaster is pleased to

announce that Groundwater Extraction & Use Reporting is now administered in-house and is available at FCGMAOnline.org. Watermaster hopes this effort will streamline the reporting process, enable data consolidation, increase efficiency and reduce costs by eliminating the need for consultant contract costs to administer reporting.

  - Data from Water Years 2023 and 2024 will be uploaded to the online reporting database for viewing in a future enhancement release.

- 2025-1 Groundwater and Extraction Use Reporting, for extractions occurring between 10/1/2025 through 3/31/2026, was released for use 4/15/2026 and will be due 5/18/2026.
- A user manual is posted on the LPV Watermaster website. For more information, please visit https://fcgma.org/lpv-reporting/.

Board & Committee Meetings

- The Fiscal Committee met on 3/24/2026 to discuss and review progress on the draft Fiscal Reserve Policy and on draft budgets for both FCGMA and LPV Watermaster.
  - The Fiscal Committee meets next on 4/28/2026 and intends to meet with high regularity until budget adoption.
  - The Fiscal Reserve Policy has been brought to your Board for consideration as part of this meeting's Agenda.
- The upcoming Operations Committee meeting has been rescheduled to Monday, 5/11/2026.
- Please see Exhibit 6A (attached) for an updated list of upcoming FCGMA Board and Committee meetings.

CONCLUSION:
This report has been reviewed by Agency Counsel. If you have any questions, please call me at (805) 650-4083.

Sincerely,

John Demers
Executive Officer

Attachment:
Item 6A – Scheduled Meetings for Calendar Year 2026

Fox Canyon Groundwater Management Agency (FCGMA)
Scheduled Meetings for Calendar Year 2026

Board Regular Meetings
Fourth Wednesday, Monthly

Date	Start Time	Room
Wednesday, January 28	12:30 PM	BOS
Wednesday, February 25	12:30 PM	BOS
Wednesday, March 25	12:30 PM	BOS
Wednesday, April 22	12:30 PM	BOS
Wednesday, May 27	12:30 PM	BOS
Wednesday, June 24	12:30 PM	BOS
Wednesday, July 22	**1:30 PM**	**MPR**
Wednesday, August 26	12:30 PM	BOS
Wednesday, September 23	12:30 PM	BOS
Wednesday, October 28	12:30 PM	BOS
Wednesday, December 9	12:30 PM	BOS

Board Special Meetings
Second Friday, Monthly, As Needed

Friday, May 8	12:30 PM	LPAR
Friday, June 12	12:30 PM	MPR
Friday, July 10	12:30 PM	MPR
Friday, August 14	12:30 PM	MPR
Friday, September 11	12:30 PM	MPR
Friday, October 9	12:30 PM	MPR
Friday, November 13	12:30 PM	MPR
Friday, December 11	12:30 PM	MPR

Executive Committee Meetings
Quarterly, As Needed

Tuesday, August 11	10:30 AM	ACR
Tuesday, November 10	10:30 AM	ACR

Fiscal Committee Meetings
As Needed

Tuesday, February 17	10:00 AM	MPR
Tuesday, March 24	1:30 PM	MPR
Tuesday, April 28	1:30 PM	LPAR
Tuesday, May 26	1:30 PM	ACR
Tuesday, June 23	1:30 PM	MPR
Tuesday, July 28	1:30 PM	MPR
Tuesday, August 18	1:30 PM	LPAR

Operations Committee Meetings
Quarterly, As Needed

Monday, May 11	9:00 AM	ACR
Monday, August 3	1:30 PM	ACR
Monday, November 2	1:30 PM	ACR

ABOUT SCHEDULED MEETINGS:

- All meetings will be held at the Ventura County Government Center, Administration Building, at 800 South Victoria Avenue, Ventura, California, unless otherwise noted.
- **Special meetings and committee meetings are subject to necessity and may be rescheduled or may not be noticed to occur.**
- When a meeting is officially noticed per the Ralph M. Brown Act, it is confirmed to occur.
- To stay up to date, contact FCGMA@venturacounty.gov with your preferred email address to subscribe to the Agency notification list.

KEY	
"As Needed"	Subject to Necessity
Row is Gray	Already Occurred
~~Strikethrough~~	Meeting Not Held
ACR	Atlantic Conference Room
BOS	Board of Supervisors Hearing Room
LPAR	Lower Plaza Assembly Room
MPR	Multi-Purpose Room

Updated 4/7/2026

FOX CANYON GROUNDWATER MANAGEMENT AGENCY

A STATE OF CALIFORNIA WATER AGENCY

DRAFT MINUTES

Action minutes of the Wednesday, March 25, 2026, hybrid regular meeting of the Fox Canyon Groundwater Management Agency Board of Directors, also sitting as watermaster for the Las Posas Valley Basin and the groundwater sustainability agency for the Las Posas Valley Basin, the Pleasant Valley Basin, and the Oxnard Subbasin. The meeting occurred via Zoom and in-person in the Board of Supervisors' Hearing Room at the Ventura County Government Center, Hall of Administration, at 800 South Victoria Avenue, Ventura, California.

1. Call to Order 12:31 P.M.

Chair Eugene F. West called the meeting to order.

2. Pledge of Allegiance

Director Maulhardt led the Pledge of Allegiance.

3. Directors Present

Chair Eugene F. West
Director Kelly Long
Director Lynn Maulhardt
Director Richard Cavaletto
Director Tony Trembley

Quorum status reached.
Alternate Directors Reddy Pakala and Bert Perello attended as members of the public.

Agency Staff Present

John Demers, Executive Officer
Jason Canger, Agency Counsel
Farai Kaseke, Assistant Groundwater Manager
Robert Hampson, Groundwater Specialist
Elka Weber, Clerk of the Board

4. Agenda Review 12:32 P.M.

No changes to the Agenda were made.

5. Public Comments 12:32 P.M.

No public comments were made.

6. Executive Officer's Comments 12:32 P.M.

Agency Executive Officer John Demers referred to the administrative report as written. In addition, he noted that the Agency welcomed 80 attendees (in-person and remotely via Zoom) at the March 10 stakeholder informational workshop[1] on FCGMA groundwater extraction reporting. Mr. Demers complemented the staff for their great work on the workshop. Director Long appreciated the Agency's recent outreach efforts.

7. Board Member Comments 12:33 P.M.

Director Maulhardt explained some logistics information to the incoming member of the Board.

CONSENT AGENDA 12:34 P.M.

8. Approval of Minutes of the January 28, 2026, Board Regular meeting.
9. Approval of Minutes of the February 25, 2026, Board Regular meeting.

CONSENT AGENDA – FCGMA Items

10. FCGMA Financial Status Report for February 2026.
11. Fiscal Year 2025-26 Mid-Year Budget Review.
12. Approve and Authorize the Executive Officer to Execute a Professional Services Contract with Rogers, Anderson, Malody & Scott for Professional Auditing Services, in the Not-to-Exceed Amount of $41,575.00, Effective Through June 30, 2026.
13. Approval of Groundwater Sustainability Plan Annual Reports for the Oxnard Subbasin and Pleasant Valley Basin for Water Year 2025.[2]

CONSENT AGENDA – LPV Watermaster Items

14. LPV Watermaster Financial Status Report for February 2026.
15. Approve and Authorize the Executive Officer to Execute a Modification to the Existing Professional Services Contract with Robert Abrams of Aquilogic, Inc. to Serve as the Landowner Representative to the Calleguas Municipal Water District Aquifer Storage and Recovery Project Study Group, Increasing the Contract

[1] More information: https://fcgma.org/groundwater-extraction-reporting/fcgma-reporting-workshops/
[2] Director Trembley asked questions regarding Item 13 later in today's meeting. Please see Item 22.

Amount to $42,500 Per Year and Extending the Term to June 30, 2028; Authorize the Executive Officer to Make Limited Changes to the Contract.

16. Approve and Authorize the Executive Officer to Execute Three Professional Service Contracts with Consultants to Serve on the Las Posas Valley Technical Advisory Committee; Authorize the Executive Officer to Make Limited Changes.

17. Appointment of David Borchard to Serve on the Las Posas Valley Basin Policy Advisory Committee as the West Las Posas Management Small Agriculture Representative.

18. Calleguas ASR POP Cost Share Agreement.

Motion: Director Maulhardt moved to adopt the Consent Agenda as presented. Director Long seconded the motion. Chair West called for a vote of all in favor on the motion raised. Director Trembley abstained from voting as he was not present during the February 25 meeting. The motion passed four in favor at 12:35 P.M.

REGULAR AGENDA

12:35 P.M.

19. Confirmation of Appointments, Selection of Chair and Vice-Chair of the Board of Directors and Board Member Committee Assignments – (Returning Item)

Presenter: Eugene West, Chair of the Board of Directors

Board Discussion Held:

Incoming Director Richard Cavaletto introduced himself to the Board and the public and expressed gratitude for the opportunity to serve. The Board welcomed him.

Director Trembley nominated incumbent Chair and Vice Chair to continue their appointments.

Director Maulhardt suggested keeping with standing tradition for Committee assignments, and proposed assigning the reaffirmed Chair and Vice Chair to serve on the Agency's Executive Committee; he then suggested the Fiscal Committee assignments remain with assigned Directors Trembley and Chair West as that work is already underway, and lastly assigned himself and Director Cavaletto to serve on the Operations Committee, as the United and Agricultural Representatives have served in the past.

Motion 1: Director Maulhardt moved to confirm the renewed Term Appointments for the Five Cities and Agricultural Representatives. Director Long seconded the motion. Chair West called for a vote of all in favor on the motion raised.

The motion passed with all in favor at 12:37 P.M.

Motion 2: Director Trembley moved to confirm standing appointments for Director West to serve as Chair and Director Long to serve as Vice Chair of the Board of Directors for Calendar Year 2026. Director Maulhardt seconded the motion. Chair West called for a roll call vote on the motion raised.

The motion passed with all in favor at 12:38 P.M.

Motion 3: Director Trembley moved to assign the reaffirmed Chair and Vice Chair to serve as members on the Agency's Executive Committee; the Fiscal Committee remain with assigned Directors Trembley and Chair West, and Directors Maulhardt and Cavaletto to serve on the Operations Committee. Director Maulhardt seconded the motion. Chair West called for a roll call vote on the motion raised.

The motion passed with all in favor at 12:40 P.M.

REGULAR AGENDA – FCGMA Items 12:40 P.M.

20. John K. Flynn Groundwater Stewardship Award Nominating Ad-Hoc Committee – (Returning Item)

Presenter: Eugene West, Chair of the Board of Directors

Board discussion held:

Director Long nominated Directors Trembley and Maulhardt to serve on an ad hoc committee to consider nominees and select a recipient of the John K. Flynn Groundwater Stewardship Award for 2026.

Motion: Director Long moved to assign Directors Trembley and Maulhardt to serve on the John K. Flynn Groundwater Stewardship Award Nominating ad hoc committee. Chair West seconded the motion. Chair West called for a roll call vote on the motion raised.

The motion passed with all in favor at 12:41 P.M.

REGULAR AGENDA – LPV Watermaster Items 12:41 P.M.

21. Presentation on Watermaster's Enforcement and Collection of Water Year 2023 Delinquent Basin Assessments – (New Item)

Presenter: Dr. Farai Kaseke, Assistant Groundwater Manager

Dr. Kaseke provided an informational presentation on LPV Watermaster's enforcement and collection of Water Year 2023 delinquent Basin Assessments and noted that the compliance procedures will take less time to accomplish in the future now that a process has been established.

No public comment was given.

As this was an informational Item only, no Board action was taken.

22. Receive and File a Presentation on the Groundwater Sustainability Plan Annual Report for the Las Posas Valley Basin for Water Year 2025; Approve and Authorize the Executive Director to Submit the Annual Report to the Department of Water Resources – (New Item) 12:47 P.M.

Presenter: Dr. Farai Kaseke, Assistant Groundwater Manager
Supporting Speaker: Robert Hampson, Groundwater Specialist

Dr. Kaseke provided a presentation on the Groundwater Sustainability Plan Annual Report for the Las Posas Valley Basin for Water Year 2025 and asked the Board of Directors to approve and authorize the Executive Officer to submit the Annual Report to the Department of Water Resources (DWR).

Board Discussion Held:

Regarding approval of the Consent Agenda, Director Trembley requested the Board hear his questions on Item 13, Approval of Groundwater Sustainability Plan Annual Reports for the Oxnard Subbasin and Pleasant Valley Basin for Water Year 2025[3]. The Board had no objection to Director Trembley's request.

Regarding the Pleasant Valley Basin Groundwater Sustainability Plan Annual Report, in this meeting's Agenda as Item 13B, Director Trembley referred to the appendix on page 13 of 71 in Item 13B (page 186 of 631 in the complete Agenda packet). Director Trembley confirmed with Mr. Hampson that Table 2-1, Groundwater Extractions in the Pleasant Valley Basin by Aquifer System and Water Use Sector, on page 13 of 71 in Item 13B, referenced Pleasant Valley Basin annual pumping beginning with 2016. Director Trembley then noted that annual pumping is varying very widely according to the table, and asked Mr. Hampson about the accuracy of the data. Mr. Hampson and Mr. Demers explained that the data in question is an accurate recitation of the numbers reported to the Agency. Regarding the wide variability of annual pumping, Mr. Hampson explained that Pleasant Valley receives a lot of surface water when it is available through the

[3] Review video of the March 25, 2026 FCGMA Board meeting for a full record rather than a summary at https://ventura.primegov.com/Portal/Meeting?meetingTemplateId=26348 (see Item 22).

Pleasant Valley pipeline; in some drier years, like 2016, less surface water is available, meaning they would have to pump more during such periods. Mr. Demers noted that Table 2-3, Total Water Available in the Pleasant Valley Basin, on page 15 of 71 in Item 13B, includes both surface water and recycled water deliveries. Mr. Demers explained that Table 2-2, Summary of Surface Water Deliveries to the Pleasant Valley Basin, on page 14 of 71 in Item 13B, includes a breakdown of all reported recycled water deliveries to the PV Basin from outside the Basin.

In response to Director Trembley's questions regarding pages 20 and 21 of 71 in Item 13B, staff explained that Total Dissolved Solids (TDS) and chloride levels rose in the North Pleasant Valley Management area at the boundary of the Las Posas Valley Basin which is generally near the recharge area location of Camarillo's Desalter. In response to Director Trembley's question whether these increased TDS and chloride level mean that treated wastewater from the Cities of Simi Valley and Moorpark continue to flow into the Pleasant Valley (PV) Basin, staff continued to explain that the Agency can determine the amounts discharged from upstream wastewater treatment plants, including the Simi Valley wastewater treatment plant, but that the amounts that flow into the PV Basin, as presented in Figures 3-3 and 3-4, are reasonable estimations based modeled and calibrated scenarios.

Regarding the current adjudication proceedings in the Oxnard Subbasin and the Pleasant Valley Basin, Director Trembley explained that the court treated those inflows in Phase One of the OPV Adjudication as non-native water as native. Director Trembley asked that this be noted as part of the meeting's official record. Director Long asked whether that point was for the lawsuit or for the Annual Report; Director Trembley responded that he is always concerned about the accuracy of information presented in reports submitted to DWR.

With regard to differentiating between native or non-native discharges, Mr. Demers explained that as a general rule, or for Groundwater Sustainability Plan Annual Reports, the Agency does not take a particular interest in distinguishing between native and non-native discharges; the Agency is primarily concerned about inflows and outflows. Mr. Demers reminded the Board and the public that while the court may take a different view on discharge differentiation in determining water rights, the FCGMA has no role in determining water rights.

Regarding Appendix A, Key Well Hydrographs, on pages 64 and 65 of 71 of Item 13B, Director Trembley asked who owns the eight monitoring wells immediately south of the Basin. Mr. Hampson responded that he could report back to Director Trembley with ownership information at a later date. Director Trembley noted that the wells located in Southern Pleasant Valley are quite low and agreed with staff that they are located in an area staff refers to as the Pleasant Valley pumping depression. Director Trembley noted that the wells located in the Pleasant Valley pumping depression were quite a bit below the minimum threshold between 2013 to 2024. In response to Director Trembley's question regarding what these low water levels mean for the PV Basin, staff explained

that this data indicates a critical situation for the basin during that time period, as reported by the hydrographs included in the report.

No public comment was given.

Motion: Director Maulhardt moved to approve the Groundwater Sustainability Plan Annual Report for the Las Posas Valley Basin for Water Year 2025 and authorize the Executive Officer to submit the Annual Report to the Department of Water Resources. Director Long seconded the motion. Chair West called for a roll call vote on the motion raised.

The motion passed with all in favor at 1:10 P.M.

23. Receive and File a Presentation on the Las Posas Valley Draft Basin Optimization Yield Study – (Returning Item) 1:11 P.M.

Presenter: Dr. Farai Kaseke, Assistant Groundwater Manager
Supporting Speaker: John Demers, Executive Officer

Dr. Kaseke provided an informational presentation on the draft Las Posas Valley Basin Optimization Yield Study (BOYS) and the Agency's schedule for its finalization and adoption. Key takeaways include a Basin Optimization Yield of 40,000 acre-feet per year (AFY) minus in lieu deliveries of imported water, meaning 1,760 AFY to the West Las Posas Management Area (WLPMA) and 1,380 AFY to the East Las Posas Management Area (ELPMA). The Basin Optimization Yield target is achievable only with in lieu delivery of imported water in collaboration with purveyors.

Dr. Kaseke emphasized that per the draft BOYS, rampdown does not appear to be needed at this time, provided that the in lieu project is fully implemented on schedule, and Simi Valley discharges to the Arroyo Simi-Las Posas continue at current rates. It is imperative that purveyors are in agreement with the in lieu project, and Dr. Kaseke noted that staff are working on this element now.

Dr. Kaseke confirmed that findings are based on model forecasting, that monitoring key wells will provide assurance that groundwater elevations remain above the minimum thresholders, and noted that, per the LPV Judgment, Basin Optimization Yield will be reevaluated in 2030 and in 2035, at a minimum.

Board Discussion Held and Assignment of Action Items:

Regarding established stakeholder review processes between LPV Watermaster staff and the Policy Advisory Committee (PAC) and the Technical Advisory Committee (TAC), Rob Grether, PAC Vice Chair, was asked by the Board to comment at 1:25 P.M.

Mr. Grether noted that all parties were in agreement and confirmed that the review schedule for the draft BOYS has followed the LPV Judgment's requirements for collaboration, as the Watermaster has done per the Judgment for all items in need of committee review. He stated that, as BOYS is a very influential issue, the PAC and he himself appreciate that the draft report has been introduced to the Board early, with multiple updates presented to the Board. Mr. Grether added that PAC is more than happy to review updated or final report drafts given timeline needs.

Regarding the stakeholder committee review process and speaking to Mr. Grether's comment about collaboration between committees in keeping with the Judgment's directives, Dr. Kaseke stated that Watermaster staff will continue the existing format, continuing to respond to comments submitted by PAC or TAC per established procedure to ensure ongoing collaboration and continuity.

Alternate Director and Oxnard City Councilmember Bert Perello commented that PAC and TAC follow Brown Act requirements for their meetings per the Judgment, which includes public noticing of agenda packets. Dr. Kaseke added that Committee agendas packets containing minutes are posted on the LPV Watermaster website[4] for all to access.

Director Long appreciated how key takeaways from Committee collaborations are highlighted in Board materials, especially with regards to whether PAC or TAC agree or disagree with Watermaster's assertions or actions.

Director Cavaletto noted that, as a previous member of the PAC, he supports statements made by Dr. Kaseke and Mr. Grether regarding the recommendation report process and how that is incorporated into staff reporting. Director Cavaletto assured the Board that if the PAC had any issues they would have raised them with staff.

Director Long confirmed with Dr. Kaseke that a link to the draft BOYS[5] is prominent on the LPV Watermaster home page of the Agency website for stakeholder visibility.

Dr. Kaseke and Chair West reminded the Board that future iterations of the draft BOYS will return to the Board in April for additional feedback, and again in May for adoption. Director Maulhardt asked that future presentations include summary documentation of PAC or TAC recommendation reports in timelines.

Mr. Demers cautioned that rampdown avoidance is conditional on the projects – and they are costly – so staff need to encourage stakeholder engagement in the process, so they

[4] See https://fcgma.org/lpv-watermaster-meetings/ and select the drop-down menu under "Meetings & Agendas" to navigate to specific archived material pages for PAC and TAC, organized by Water Year.
[5] See https://fcgma.org/lpv_boys/; this page is linked from the navigation menu prominent on the LPV Watermaster home page at https://fcgma.org/las-posas-valley-watermaster/.

are aware of higher Basin Assessments being levied in the future. He added that Watermaster will also need to address targeted pumping drawdown.

As this was an informational Item only, no Board action was taken.

CLOSED SESSION AGENDA 1:46 P.M.

Chair West asked for public comment regarding the matters agendized in closed session. None was given.

Chair West recessed into closed session at 12:56 P.M.

24. **CONFERENCE WITH LEGAL COUNSEL – EXISTING LITIGATION** (Gov. Code, §54956.9) PURSUANT TO GOVERNMENT CODE SECTION 54956.9, SUBDIVISION (d), PARAGRAPH (1): NAME OF CASE: City of Oxnard v. Fox Canyon Groundwater Management Agency, Los Angeles County Superior Court Case No. 20STCP00929

25. **CONFERENCE WITH LEGAL COUNSEL – EXISTING LITIGATION** (Gov. Code, §54956.9) PURSUANT TO GOVERNMENT CODE SECTION 54956.9, SUBDIVISION (d), PARAGRAPH (1): NAME OF CASE: Las Posas Valley Water Rights Coalition v. Fox Canyon Groundwater Management Agency, Santa Barbara County Superior Court Case No. VENCI0059700

26. **CONFERENCE WITH LEGAL COUNSEL – EXISTING LITIGATION** (Gov. Code, §54956.9) PURSUANT TO GOVERNMENT CODE SECTION 54956.9, SUBDIVISION (d), PARAGRAPH (1): NAME OF CASE: OPV Coalition et al v. Fox Canyon Groundwater Management Agency, Santa Barbara County Superior Court Case No. VENCI00555357

27. Adjournment

Chair West adjourned the meeting from closed session.

Submitted by:

_____
Elka Weber
Clerk of the Board

PREPARED BY: Daiva Pekinas

A	B	C	D	E	F	G	H	I	J	K	L	M	N
1	**FUND: O170 UNIT: 5795**				**DETAIL BY ACCOUNTING PERIOD**								
2	**FOX CANYON GROUNDWATER MANAGEMENT AGENCY**	**OBJ**	**PROGRAM**	**TOTAL**	**AP 01**	**AP 02**	**AP 03**	**AP 04**	**AP 05**	**AP 06**	**AP 07**	**AP 08**	**AP 09**
3	**Financial Status Report as of March 2026**				**July'25**	**August'25**	**September'25**	**October'25**	**November'25**	**December'25**	**January'26**	**February'26**	**March'26**
4	BEGINNING CASH BALANCE			10,774,951.83	10,774,951.83	10,425,342.28	10,115,128.69	10,037,008.47	10,092,220.84	12,034,773.47	13,175,472.10	13,046,779.09	12,811,049.73
5	**REVENUE:**												
6	PUMP CHARGES	9790	P6020901	323,346.18	(173,699.81)	11,095.78	34,193.01	58,556.90	203,943.77	161,893.70	3,547.23	23,628.17	187.43
7	SURCHARGES	9790	P6020903	684,855.10	6,004.45	(0.01)	46,068.96	46,449.90	464,300.11	104,279.48	-	2,354.20	15,398.01
8	INTEREST/ PENALTIES	9790	P6020904	60,608.31	4,318.83	16,707.45	8,210.74	14,441.28	4,229.11	5,510.65	3,371.45	213.54	3,605.26
9	GEMES RESERVE FEE	9790	P6020907	1,385,061.73	34,326.70	2,290.85	63,657.06	160,233.29	679,210.15	430,498.12	12,566.04	1,694.53	584.99
10	SUSTAINABILITY FEE	9790	P6020908	1,999,220.02	49,087.88	3,322.15	83,345.14	232,397.15	985,320.96	625,633.47	17,112.32	2,152.71	848.24
11	FCGMA TECH SERVICES - GRANT	9708	P6020852	51,501.00	-	-	51,501.00	-	-	-	-	-	-
12	INTEREST EARNINGS (COUNTY POOLED INVESTMENT FUND)	8911	-	110,665.18	(145,562.29)	40,246.03	-	52,658.13	-	52,658.13	55,332.59	-	55,332.59
13	OTHER REVENUE	9790	-	-	-	-	-	-	-	-	-	-	-
14	**TOTAL REVENUE**			**4,615,257.52**	**(225,524.24)**	**73,662.25**	**286,975.91**	**564,736.65**	**2,337,004.10**	**1,380,473.55**	**91,929.63**	**30,043.15**	**75,956.52**
15	**EXPENDITURES:**												
16	***SUPPORT***												
17	PUBLIC WORKS CHARGES	2205	-	1,826,081.33	113,748.03	197,137.77	241,772.81	318,922.61	191,077.74	168,338.36	181,479.94	196,047.05	217,557.02
18	PUBLIC WORKS CHARGES - CSD ALLOCATION	2199	P6020850	121,900.00	-	60,950.00	-	-	60,950.00	-	-	-	-
19	FCGMA ONLINE SUPPORT	2202	P6020850/70	32,577.61	-	7,231.02	3,599.27	3,785.45	3,702.97	3,538.01	3,620.49	3,562.39	3,538.01
20	WPD - SCR COORDINATOR	2199	P6020850	3,000.00	-	-	-	-	1,500.00	-	1,500.00	-	-
21	BOARD & COMMISSION MEMBER COMPENSATION	2181	P6020890	200.00	-	-	-	-	-	-	-	-	200.00
22	***GSA CHARGES***												
23	PURCHASING CHARGES ISF	2165	P6020850	2.52	-	-	-	1.12	0.28	-	0.56	0.28	0.28
24	GRAPHICS CHARGES ISF	2166	P6020850	733.26	-	-	35.00	353.26	288.00	-	-	-	57.00
25	SPECIAL SERVCES ISF	2206/2116	P6020850	5,312.95	-	-	1,394.12	455.56	407.56	532.56	2,349.15	-	174.00
26	VOICE DATA ISF	2032	P6020850	100.98	-	22.44	11.22	11.22	11.22	11.22	11.22	11.22	11.22
27	MAIL CENTER ISF	2164	P6020850	8,824.78	-	-	-	-	67.59	2,992.94	-	-	5,764.25
28	STORES ISF	2168	P6020850	6.00	-	-	-	6.00	-	-	-	-	-
29	***CONTRACT***												
30	CONSULTANT CONTRACT (DUDEK) - Implementation	2183	P6020858	9,290.00	-	9,290.00	-	-	-	-	-	-	-
31	CONSULTANT CONTRACT (DUDEK) - Annual reports	2183	P6020858	-	-	-	-	-	-	-	-	-	-
32	***LEGAL***												
33	COUNTY COUNSEL	2185	P6020853	68,181.75	-	9,964.50	10,783.50	10,032.75	8,394.75	-	15,697.50	6,279.00	7,029.75
34	COUNTY COUNSEL (GEMES) - LPV Basin Adjudication	2185	P6020864	-	-	-	-	-	-	-	-	-	-
35	COUNTY COUNSEL (GEMES) - City of Oxnard v FCGMA	2185	P6020866	19,997.25	-	409.50	1,160.25	1,842.75	7,029.75	-	3,958.50	4,914.00	682.50
36	COUNTY COUNSEL (GEMES) - OPV Coalition v FCGMA	2185	P6020867	41,769.00	-	6,006.00	23,341.50	2,934.75	-	-	7,098.00	1,706.25	682.50
37	COUNTY COUNSEL (GEMES) - OPV Coalition v FCGMA -Travel Expense	2292	P6020867	42.00	-	-	42.00	-	-	-	-	-	-
38	OTHER LEGAL FEES (Stoel)(GEMES) - LPV Basin Adjudication	2185	P6020864	-	-	-	-	-	-	-	-	-	
39	OTHER LEGAL FEES (Stoel)(GEMES) - City of Oxnard v FCGMA	2185	P6020866	754.89	-	81.83	163.66	-	81.83	163.66	-	-	263.91
40	OTHER LEGAL FEES (Stoel)(GEMES) - OPV Coalition v FCGMA	2185	P6020867	887.25	-	-	-	-	887.25	-	-	-	-
41	OTHER LEGAL FEES (Shute Mihaly)(GEMES) - OPV Coalition v FCGMA	2185	P6020867	396,617.62	-	53,485.51	78,178.53	130,339.80	81,593.91	13,718.56	-	19,870.51	19,430.80
42	OTHER LEGAL FEES (GMSR LLP) (GEMES) - City of Oxnard v FCGMA	2185	P6020866	192,244.00	-	29,775.00	-	40,210.00	37,910.00	48,155.00	2,950.00	32,349.00	895.00
43	***GRANT***												
44	KENNEDY JENKS	2199	P6020852	130.00	130.00	-	-	-	-	-	-	-	-
45	***OTHER***												
46	ASSN OF WATER AGENCIES DUES	2159	P6020850	347.00	-	-	-	-	-	-	347.00	-	-
47	BIENNIAL AUDIT	2199	P6020850	13,505.00	-	8,990.00	4,515.00	-	-	-	-	-	-
48	BOARD MEMBERS INSURANCE	2072	P6020850	5,430.28	4,997.28	433.00	-	-	-	-	-	-	-
49	CONFERENCES / SEMINARS	2273	P6020850	3,674.00	-	-	-	-	-	1,074.00	40.00	60.00	2,500.00
50	GROUNDWATER SUSTAINABILITY PLAN (GSP) DEV - Monitoring Wells	2188	P6020858	866.00	-	-	-	-	-	-	866.00	-	-
51	LAFCO FUNDING	2159	P6020850	5,192.00	5,192.00	-	-	-	-	-	-	-	-
52	MISC OFFICE EXPENSE	2159/79	P6020850	360.46	18.00	-	-	80.40	-	215.50	-	46.56	-
53	PUBLICATIONS AND LEGAL NOTICES	2221	P6020850	1,287.89	-	-	-	449.34	449.35	194.60	194.60	-	-
54	SOFTWARE SUBSCRIPTIONS NON ISF (ZOOM)	2236	P6020850	1,521.87	-	99.27	99.27	99.27	99.27	99.27	99.27	926.25	-
55	TRAVEL EXPENSE	2292	P6020850	1,448.25	-	-	-	-	-	741.24	410.41	-	296.60
56	**TOTAL EXPENDITURES**			**2,762,285.94**	**124,085.31**	**383,875.84**	**365,096.13**	**509,524.28**	**394,451.47**	**239,774.92**	**220,622.64**	**265,772.51**	**259,082.84**
57	**NET MONTHLY INCOME**				(349,609.55)	(310,213.59)	(78,120.22)	55,212.37	1,942,552.63	1,140,698.63	(128,693.01)	(235,729.36)	(183,126.32)
58	**ENDING CASH BALANCE**			**12,627,923.41**	**10,425,342.28**	**10,115,128.69**	**10,037,008.47**	**10,092,220.84**	**12,034,773.47**	**13,175,472.10**	**13,046,779.09**	**12,811,049.73**	**12,627,923.41**
59	**NOTES:**												

Revenue increased by 153% in March due to the $55,332.59 interest earnings allocated from the County Pooled Investment fund this month. Operational revenue was minimal in March, as FCGMA received a few late payments for the 2025-2 Semi-Annual Extraction Statement (SAES) reporting period, and prior periods. Reporting period SAES 2026-1, currently released, covers the period from October 1st through March 31st, and statements are due to FCGMA by May 15.

Expenses decreased by $6,689.67 (2.5%) compared to February, primarily due to a decrease in legal fees billed this month. This includes the Greines, Martin, Stein & Richland LLP (GMSR LLP) fees billed towards litigation with City of Oxnard, and lower County Counsel fees billed in February. These lowered expenses are offset by higher PWA & GSA support costs as well as the Association of Water Agencies Ventura County's Annual Water Symposium table reservation. The Flynn Award is traditionally presented by our Chair at this event.

4/13/2026

PREPARED BY: Daiva Pekinas

	FUND: O171 UNIT: 5796			DETAIL BY ACCOUNTING PERIOD								
	LPV WATERMASTER	**OBJ**	**PROG**	**TOTAL**	**AP 01**	**AP 02**	**AP 03**	**AP 04**	**AP 05**	**AP 06**	**AP 07**	**AP 08**	**AP 09**
	Financial Status Report as of March 2026				**July'25**	**August'25**	**September'25**	**October'25**	**November'25**	**December'25**	**January'26**	**February'26**	**March'26**
	BEGINNING CASH BALANCE			**1,265,314.36**	1,265,314.36	1,186,052.32	961,109.41	906,197.06	1,232,394.49	1,218,793.74	1,137,716.91	1,367,162.01	1,420,457.24
	REVENUE:												
	BASIN ASSESSMENT FEE	9790	P6020670	1,152,052.33	(30,504.01)	2,782.43	-	368,021.33	130,008.05	64,854.20	302,615.50	174,601.18	139,673.65
	BASIN ASSESSMENT INTEREST	9790	P6020671	12,712.07	275.23	278.24	-	1.55	79.12	6,114.41	2,803.75	-	3,159.77
	LPV BOP ASSESSMENT	9790	P6020674	126,777.02	-	-	-	34,585.64	15,726.62	4,394.45	35,815.79	21,185.57	15,068.95
	LPV BOP ASSESSMENT INTEREST	9790	P6020675	765.81	-	-	-	-	-	320.29	249.96	-	195.56
	LPV ATTORNEYS' FEES COLLECTED	9790	P6020676	1,743.88	-	-	-	-	-	-	-	-	1,743.88
	LPV COSTS OF COLLECTION	9790	P6020677	1,139.34	-	-	-	-	-	-	-	-	1,139.34
	INTEREST EARNINGS (COUNTY POOLED INVESTMENT FUND)	8911	-	11,820.64	(25,765.00)	9,057.56	-	8,353.72	-	8,353.72	5,910.32	-	5,910.32
	TOTAL REVENUE			**1,307,011.09**	**(55,993.78)**	**12,118.23**	**-**	**410,962.24**	**145,813.79**	**84,037.07**	**347,395.32**	**195,786.75**	**166,891.47**
	EXPENDITURES:												
	SUPPORT												
	PUBLIC WORKS ISF CHARGES - LPV WATERMASTER ADMINISTRATION	2205	P6020660	91,895.50	3,838.18	8,463.88	7,911.22	14,349.86	7,172.28	5,325.42	4,928.34	13,603.90	26,302.42
	PUBLIC WORKS ISF CHARGES - LPV ALLOCATIONS & RECORD KEEPING	2205	P6020661	110,077.04	2,848.08	4,313.43	3,740.50	12,529.81	12,158.01	15,153.32	5,985.96	38,465.98	14,881.95
	PUBLIC WORKS ISF CHARGES - LPV BASIN MANAGEMENT	2205	P6020662	69,830.74	1,033.04	8,409.43	3,629.80	16,673.41	16,168.34	19,382.77	14,116.92	(15,464.61)	5,881.64
	PUBLIC WORKS ISF CHARGES - LPV COMMITTEE COORDINATION & CONSULTATION	2205	P6020663	18,882.36	2,522.95	2,909.91	2,389.32	630.77	1,233.89	1,125.59	2,948.44	1,784.03	3,337.46
	PUBLIC WORKS ISF CHARGES - LPV BUDGET & ASSESSMENTS	2205	P6020664	24,794.20	1,972.41	901.93	-	4,747.09	1,386.48	965.60	2,948.07	8,870.29	3,002.33
	PUBLIC WORKS ISF CHARGES - LPV LEGAL SERVICES	2205	P6020666	4,239.31	408.82	543.25	-	847.05	635.29	-	433.17	721.96	649.77
	PUBLIC WORKS ISF CHARGES - LPV IT SERVICE & SUPPORT	2205	P6020667	11,861.99	282.29	1,443.91	359.15	3,591.53	1,126.81	1,376.76	419.01	216.58	3,045.95
	PUBLIC WORKS CHARGES - LPV IT SERVICE & SUPPORT (CSD IT)	2199	P6020667	87,400.00	-	43,700.00	-	-	43,700.00	-	-	-	-
	PUBLIC WORKS CHARGES - FISCAL SUPPORT (CSD FISCAL)	2199	P6020664	12,450.00	-	6,225.00	-	-	6,225.00	-	-	-	-
	LPV CALLEGUAS ASR STUDY GROUP PROJECT OPERATIONS	2205	P6020665	6,408.29	-	-	-	119.72	-	359.15	1,694.12	847.05	3,388.25
	LPV PROJECT BASIN ASSESSMENT IMPLEMENTATION	2205	P6020668	39,860.73	-	-	3,893.36	1,054.60	2,920.01	6,975.64	8,435.61	6,685.90	9,895.61
	LEGAL												
	LPV LEGAL SERVICES - COUNTY COUNSEL	2185	P6020666	77,941.50	-	13,513.50	7,644.00	10,578.75	14,400.75	-	14,469.00	10,442.25	6,893.25
	LPV LEGAL SERVICES - STOEL RIVES - LPV Water Rights	2185	P6020666	94,334.67	-	42,522.65	17,343.06	-	9,693.18	8,778.81	-	1,889.00	14,107.97
	LPV LEGAL SERVICES - STOEL RIVES - GENERAL LEGAL	2185	P6020666	101,654.20	-	-	-	-	21,826.40	25,003.50	-	32,257.80	22,566.50
	CONTRACTS												
	RGS AUTHORITY	2199	P6020661	58,658.72	10,362.49	-	8,001.94	7,594.22	8,893.85	5,125.57	9,320.83	8,421.89	937.93
	TODD GROUNDWATER-TAC	2199	P6020663	42,068.75	-	6,972.50	-	6,963.75	8,248.75	1,923.75	-	3,518.75	14,441.25
	AQUILOGIC - TAC	2199	P6020663	32,296.27	-	1,520.00	-	3,420.00	-	8,546.27	380.00	-	18,430.00
	AQUILOGIC - ASR STUDY GROUP	2199	P6020665	9,400.00	-	-	-	-	-	1,200.00	2,400.00	-	5,800.00
	DANIEL B STEPHENS & ASSOCIATES - TAC	2199	P6020663	12,125.25	-	1,347.25	-	1,109.50	1,743.50	-	-	1,268.00	6,657.00
	DANIEL B STEPHENS & ASSOCIATES - PAC	2199	P6020663	4,992.75	-	317.00	-	554.75	-	1,268.00	475.50	-	2,377.50
	DUDEK (GSP Update Task 10.2.1 - Committee Review & Response, Periodic Evaluation)	2183	P6020662	-	-	-	-	-	-	-	-	-	-
	DUDEK (Initial Basin Optimization Plan - Tasks 12.5 - 12.7)	2183	P6020662	442.50	-	442.50	-	-	-	-	-	-	-
	DUDEK (2025 Basin Optimization Yield Study)	2183	P6020662	208,428.75	-	80,135.00	-	-	-	58,793.75	43,401.25	26,098.75	-
	DUDEK (Task 13 - TAC Watermaster Support Services)	2183	P6020663	13,380.00	-	13,380.00	-	-	-	-	-	-	-
	OTHER												
	AUDIT - BROWN ARMSTRONG ACCOUNTANCY CORP	2199	P6020664	14,881.25	-	-	-	-	1,882.00	3,810.00	5,594.00	2,864.00	731.25
	TOTAL EXPENDITURES			**1,148,304.77**	**23,268.26**	**237,061.14**	**54,912.35**	**84,764.81**	**159,414.54**	**165,113.90**	**117,950.22**	**142,491.52**	**163,328.03**
	NET MONTHLY INCOME				(79,262.04)	(224,942.91)	(54,912.35)	326,197.43	(13,600.75)	(81,076.83)	229,445.10	53,295.23	3,563.44
	ENDING CASH BALANCE			**1,424,020.68**	**1,186,052.32**	**961,109.41**	**906,197.06**	**1,232,394.49**	**1,218,793.74**	**1,137,716.91**	**1,367,162.01**	**1,420,457.24**	**1,424,020.68**

NOTES:

For Water Year 2025, the Watermaster Board approved a $60 per acre-foot (AF) Basin Assessment and a $7.25/AF Basin Optimization Projects (BOP) Assessment, both billed in four equal, quarterly installments. In March, LPV Watermaster recorded $166,891.47 in revenue, a decrease of $28,895.28 (14.8%) from the previous month. March revenue consisted of payments for Q2 LPV-2025-2 Basin Assessments, which were due on 02/02/2026, as well as $5,910.32 interest earnings allocated from the County Pooled Investment fund in March. LPV-2025-3 Basin Assessments for the Q3 (April, May, and June) period were released April 1st.

In March, total expenses increased by $20,836.51 (14.6%) compared to February, primarily due to higher charges for PWA support in LPV Watermaster Administration, IT support and Calleguas ASR Study Group Project Operations. Fees related to legal services and contract expenses increased. Stoel Rives's invoice for LPV Water Rights Coalition v. Fox Canyon services rendered through December, was higher by $12,218.97 in March. Technical Advisory Committee (TAC) charges increased by $34,741.50 and are billed through January services. Brown Armstrong Accountancy Corp. submitted their first invoice for the FY 2025-26 LPV Watermaster full certified audit.

4/13/2026

FOX CANYON GROUNDWATER MANAGEMENT AGENCY

A STATE OF CALIFORNIA WATER AGENCY

April 22, 2026

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

SUBJECT: Adoption of FCGMA Fiscal Reserve Policy – *(New Item)*

RECOMMENDATION: Adopt Fiscal Reserve Policy.

BACKGROUND:
As a Special District, the Agency is responsible for providing stewardship over its funds. Part of that responsibly is to ensure that an appropriate amount of reserve funds is maintained and well managed. For Special Districts, reserves are the foundation of the sustainable delivery of core services. Prudent management of reserves offers ratepayers significant benefits, including a balanced budget, emergency preparedness, and stable rates, as well as an investment in the future. Determining the level of reserve funding is a key component of effective fiscal policy, as insufficient reserves could jeopardize the Agency's long-term viability, yet an unwarranted amount could undermine ratepayer support and confidence.

DISCUSSION:
Staff have developed an Agency Reserve Policy (attached as Exhibit 11A) for your Board's consideration. This draft policy includes several categories of funds designed to ensure both the continuity of current operations as well as planning for the future. The policy builds upon and supersedes existing fund management guidance and is more comprehensive and detailed than the Agency's current operating procedures.

CONCLUSION:
Staff recommend that your Board receive a presentation and adopt the Fiscal Reserve Policy. This letter has been reviewed by Agency Counsel. If you have any questions, please contact me at (805) 650-4083.

Sincerely,

John Demers
Executive Officer

Attachments: Exhibit 11A – Draft FCGMA Fiscal Reserve Policy

Fox Canyon Groundwater Management Agency

FISCAL RESERVE POLICY

ADOPTED BY THE BOARD OF DIRECTORS

APRIL 22, 2026

Table of Contents

Fox Canyon Groundwater Management Agency

FISCAL RESERVE POLICY

I. POLICY OBJECTIVE

The purpose of the Fox Canyon Groundwater Management Agency (Agency) Fiscal Reserve Policy (Policy) is to ensure that the Agency will have adequate funding and liquidity in order to mitigate risk or uncertainty in revenue and expenses, to maintain a stable financial base to sustain the Agency's operations and provide for the timely replacement of critical infrastructure. The Policy is intended to be used in conjunction with the Agency's budgets and long-range financial plan. Properly designed policies demonstrate that the Board is committed to the Agency's long-term financial health and include:

- Establishing prudent reserve policies to ensure strong fiscal management to guide Agency decisions;
- Providing the ability to meet the Agency's short-term and long-term obligations and to ensure that the Agency maintains the ability to receive a high credit rating (AA or better);
- Ensuring funding is available for current and future replacement of assets; and
- Helping smooth rates from year-to-year while promoting long-term equity to ratepayers.

II. BACKGROUND AND INTRODUCTION

The complex nature of Fox Canyon's operations and its various legal and legislative requirements dictates a multifaceted and sophisticated financial structure. The Agency has implemented numerous operating programs to ensure it is meeting all requirements imposed by the Fox Canyon Groundwater Management Agency Act, the Sustainable Groundwater Management Act (SGMA), and other legal requirements.

To ensure the Agency satisfies its commitments under its numerous financial, regulatory, and contractual obligations, the Agency has developed and segregated several types of accounts. The prudent management of these accounts will provide assurance that the

current levels of Agency performance will continue, and the Agency will be able to meet all statutory requirements.

These accounts can be broken out into two types: Operating and Designated. Currently, the Agency maintains the following accounts:

Account	Type	Purpose
Operating Account	Operating	Routine annual operation expenses as identified in Work Plan.
Groundwater Extraction Management Enforcement Surcharge (GEMES) Account	Designated	Fund litigation costs, including Agency counsel and outside counsel.
Surcharges Account	Designated	For Board-directed uses only, not to be used for routine Agency operations.
Operating Reserves	Designated	Maintain a flat fee reserve balance based on Board direction.

During the adoption of the Agency's budget, a comprehensive assessment is conducted of all accounts and their respective prioritization and funding levels. In accordance with sound financial management practices, the strategic determination of the optimal level and distinct delineation of reserve subcategories is imperative for the fiscal well-being of the Agency. This policy establishes the mandated reserve types along with their corresponding funding thresholds, including defining new accounts. This policy shall be reviewed annually during the budget development process, during which the Executive Officer shall provide a Reserve Status Report showing the current balance for each fund category.

III. RESERVE DEFINITIONS

A. Operating Reserves

The Operating Reserves are comprised of two reserve funds with individual target levels based on the major classifications of risk to the Agency's operations. This expands upon the current Operating Reserves Account and eliminates the current "carryforward" designated of certain funds.

1. Working Capital Reserve

This reserve acts as the "base" reserve and is intended to provide sufficient liquidity from a cash-flow perspective to facilitate the normal dynamic of ongoing expenses and episodic revenue collection.

a. **Funding Sources:** Operating revenues (pump charges and groundwater sustainability fees) or Board-approved transfers from other funds.

b. **Target Levels:** The target level for this reserve shall be 180 days of annual budgeted operating costs and shall maintain a minimum balance equal to 120 days of the total Annual Operating Budget and a maximum balance of 240 days of the total Annual Operating Budget.

c. **Events or Conditions Prompting the Use of the Fund:** This fund may be routinely utilized by staff to cover temporary cash- flow deficiencies caused by timing differences between revenue and expenses or decreases in revenues and unexpected increases in expenses. Requires Executive Officer approval with a report to the Board.

d. **Replenishment:** Upon the drawing of funds resulting in a balance at or below the target, staff will recommend a course of action to meet the target level. The recommendation will include:

- Identification of the cause of the draw-down.

- Incorporation of a Replenishment Line Item in the subsequent fiscal year's budget.
- A target of full restoration of the floor within 24 to 36 months.

2. Rate Stabilization Reserve

The Agency's Rate Stabilization Reserve provides broad protection against unexpected costs or loss of revenues and acts as the primary reserve when considering mitigating rate increases. This fund is differentiated from the Working Capital Reserve in that its intent is to absorb unanticipated short-term costs without triggering a rate increase, whereas the Working Capital Reserve allows for uninterrupted operations despite cyclical revenue collection. The Rate Stabilization Reserve can also be used to reduce the need for rate increases if the rate increase is contemplated for short-term reasons.

a. **Funding Sources:** Operating revenues (pump charges and groundwater sustainability fees). One-half of positive net operating results will be transferred into this account until the target level is reached.

b. **Target Level:** The Rate Stabilization Reserve shall have a target level of 120 days of annual budgeted operating costs. This reserve fund may increase in order to plan for anticipated increases in operating costs.

c. **Events or Conditions Prompting the Use of the Fund:** Used to cover funding for unanticipated major expenses during a year which may otherwise impact rates or fees charged. Requires Executive Officer approval with a report to the Board.

d. **Replenishment:** Upon the drawing of funds below the target level, staff will recommend a course of action within the

budget and long-range financial planning process to meet the target level. The recommendation will include:

- Identification of the cause of the draw-down.
- Incorporation of a Replenishment Line Item in the subsequent fiscal year's budget.
- A target of full restoration of the floor within 24 to 36 months.

B. Non-Operating Reserves

1. Water Supply Sustainability Reserve

This reserve account is established in order to fund or assist in funding water supply and sustainability projects. Examples of such projects may include the purchase of surplus water, the purchase of Article 21 water when available, construction or maintenance of monitoring wells, engineering studies, groundwater flow model development, or similar types of work. This account replaces the current Surcharges Account.

a. **Funding Sources:** Surcharges or Board directed transfers from other funds.

b. **Target Levels:** The Water Supply Sustainability Reserve target is set at the discretion of the Board. The Agency may set aside funds for certain identified projects until such time as work commences on the identified project as well as funds for anticipated but not fully defined future projects.

c. **Events or Conditions Prompting the Use of the Fund:** Staff will recommend new projects during the annual budget preparation. As projects are approved, funds will be appropriated from other reserve funds or available revenues. Use of this fund requires Board approval.

d. **Replenishment:** Upon the drawing of funds resulting in a balance at or below the target, staff will recommend a course of action to meet the target level. The recommendation will include:

i. Identification of the cause of the draw-down.
ii. Incorporation of a Replenishment Line Item in the subsequent fiscal year's budget.
iii. A target of full restoration of the floor within 24 to 36 months.

2. Debt Service Reserve. Not currently operative. The category will be defined should it be required in the future.

3. Risk Management Reserve. Not currently operative. The category will be defined should it be required in the future.

IV. ADDITIONAL USES OF RESERVES

If reserve funds have reached their maximum target levels, the Board may instruct staff to utilize additional reserves in the following ways.

1. Advance fund any of the Agency's short-term or long-term liabilities, including but not limited to outstanding debt, lease obligations, State Revolving Fund (SRF) loans, interfund loans, or other loans.

2. In the event the Agency's budget process identifies large future spending plans, reserves can be transferred to fund the Water Supply Sustainability Reserve, cash funding capital projects, and/or future capital commitments at the Board's discretion.

3. Consideration will be given to reducing fees and charges to ratepayers should no other reasonable and timely use exist for the funds.

Fox Canyon Groundwater Management Agency

FISCAL RESERVE POLICY

V. RESERVE FUND SUMMARY

Reserve Fund	Minimum	Target	Maximum
Working Capital Reserve[1]	120 days of total Annual Operating Budget.	180 days of total Annual Operating Budget.	240 days of total Annual Operating Budget.
Water Supply Sustainability Reserve	N/A	Set at the discretion of the Board, based on anticipated projects.	N/A
Rate Stabilization Reserve	90 days of total Annual Operating Budget.	120 days of total Annual Operating Budget.	180 days of total Annual Operating Budget.
Debt Service Reserve	Not currently operative.	Not currently operative.	Not currently operative.
Risk Management Reserve	Not currently operative.	Not currently operative.	Not currently operative.

[1] Base Reserves - Agency Minimum

April 22, 2026

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

SUBJECT: Adoption of Proposed Resolution No. 2026-02, A Resolution Increasing the Tiered Groundwater Surcharge Rates – *(Returning Item)*

RECOMMENDATIONS: (1) Receive an Agency staff presentation regarding increasing tiered groundwater extraction surcharge rates; and **(2)** Adopt Resolution No. 2026-02, approving increased tiered groundwater extraction surcharge rates consistent with Calleguas Municipal Water District's rate increase, effective January 1, 2026.

BACKGROUND

One of the principal ways the Agency manages the groundwater resources within its jurisdiction is by controlling groundwater extractions by establishing extraction allocations and imposing surcharges on extractions in excess of allocations. The Fox Canyon Groundwater Management Agency Act (Act), California Water Code Appendix, Chapter 121, and the Agency's several ordinances authorize these management actions. The Act authorizes the Agency to both establish extraction allocations and surcharges for extractions that exceed allocations:

> *"The agency may, by ordinance, establish an operator's extraction allocation for each groundwater extraction facility located within the agency. The agency may, by ordinance, impose upon the operator of any groundwater extraction facility located within the agency, extraction surcharges for extractions in excess of his or her extraction allocation and late penalties for nonpayment of extraction surcharges." (Wat. Code App., § 121-1101.)*

The Act states that the purpose of surcharges is "to discourage the use of groundwater beyond the extractions allocation" in recognition that "extraction allocations and extraction surcharges … are necessary to eliminate overdraft caused by excess extractions[.]" (Id.,

at §121-1102(a), (b).) Since enactment of the Act in 1982, the Agency has adopted several ordinances that set forth the Agency's surcharge policy and requirements.

The Agency Ordinance Code recognizes that extraction surcharges are necessary to achieve the basins' management goals and shall be assessed when annual extractions exceed allocations.

The Agency Ordinance Code also provides direction on how surcharge rates are to be set. "The extraction surcharge shall be fixed by the Board and shall be based upon (1) the cost to import potable water from the Metropolitan Water District of Southern California, or other equivalent water sources that can or do provide non-native water within the Agency jurisdiction; and (2) the current groundwater conditions within the Agency jurisdiction." (Agency Ordinance Code, § 5.8.1.1.) The Agency Ordinance Code requires the Board to "fix the surcharge … at a cost sufficiently high to discourage extraction of groundwater in excess of the approved allocation when that extraction will adversely affect achieving" the management goals for the basins. (Agency Ordinance Code, §§ 5.8.1.1, 5.8.3.) In turn, the Agency Ordinance Code authorizes the Board to structure, tier, and vary the extraction surcharge between basins and aquifers in its discretion. (Agency Ordinance Code, § 5.8.2.)

On October 23, 2013, your Board adopted Resolution No. 2013-03, which established a three-tier surcharge rate structure based on the Board's findings that an economic disincentive is the best means to discourage over pumping of groundwater and that a single tier surcharge rate had not been effective in deterring operators who greatly exceed their extraction allocation. The Resolution established three tiers of rates: Tier I (25 acre-feet per year [AFY] or less above allocation); Tier II (over 25 AFY but less than 100 AFY above allocation); and Tier III (100 AFY and more above allocation). Current surcharge rates were established when the Board adopted Resolution No. 2024-03 on April 24, 2024: Tier I at $1,929 per acre-foot (AF); Tier II at $2,179 (the Tier I rate plus an additional $250 per AF); and Tier III at $2,429 (the Tier I rate plus an additional $500 per AF).

DISCUSSION

Proposed Resolution No. 2026-02 (attached as Exhibit 12A), increases tiered groundwater extraction surcharge rates in order to be consistent with current Calleguas Municipal Water District's (CMWD) rates. CMWD is a member agency of Metropolitan Water District and is the largest purveyor of imported water within the Agency. The CMWD Board adopted increased water rates effective January 1, 2026, increasing its Total CMWD and MWD Rate to $2,058 per AF. As a result, the current FCGMA Tier 1 surcharge rate is less than the cost of imported water available from CMWD.

Historically, FCGMA set its Tier 1 surcharge rate to match CMWD's Tier 2 Supply Rate. CMWD no longer has a Tier 2 Supply Rate, as such staff recommends setting the FCGMA

Tier I surcharge rate to match CMWD's Total CMWD and MWD Combined Rate inclusive of capacity charges and a Readiness-to-Serve fee (attached as Exhibit 12B).

Proposed Resolution No. 2026-02 would adjust the Agency's tiered surcharge rates effective January 1, 2026, consistent with the increase in the CMWD rate as follows:

Tier I: One to 25.000 AF = $ 2,289 per AF

Tier II: 25.001 AF to 99.999 AF = $2,539 per AF

Tier III: 100 AF or more = $2,789 per AF

While groundwater conditions have generally improved, GSP Annual Reports indicate overall groundwater production continues to be greater than the estimated safe and sustainable yields for the basins within the Agency's boundaries. To keep with the Act's and the Agency's surcharge policy, the updated surcharge rates are proposed to "discourage the use of groundwater beyond extraction allocation[s]" and eliminate overdraft to ensure the basins are managed sustainably. The proposed resolution only changes the amount of the surcharge and does not modify when surcharges are incurred. If adopted, the increased tiered surcharge rates would apply to groundwater extractions reported for Water Year 2025-26 (the current Water Year).

CONCLUSION

Agency staff recommends your Board adopt proposed Resolution No. 2026-02 to increase the Agency's surcharge rates to be consistent with CMWD's rate increase effective January 1, 2026.

This letter has been reviewed by Agency Counsel. If you have any questions, please call me at (805) 654-2954.

Sincerely,

Kudzai Farai Kaseke (PhD, PH, PMP, CSM)
Assistant Groundwater Manager

Attachments:

Exhibit 12A – Proposed Resolution No. 2026-02
Exhibit 12B – CMWD 2026 Adopted Water Rates

Resolution 2026-02
of the
Fox Canyon Groundwater Management Agency

A RESOLUTION INCREASING TIERED GROUNDWATER EXTRACTION SURCHARGE RATES

WHEREAS, the mission of the Fox Canyon Groundwater Management Agency (Agency) includes the protection and preservation of groundwater resources within the boundary of the Agency; and

WHEREAS, the Agency is charged with bringing the groundwater basins within its jurisdiction into safe yield; and

WHEREAS, the Agency is authorized to establish an extraction allocation for each groundwater extraction facility located within the Agency, and to impose extraction surcharges for extractions in excess of a facility's extraction allocation; and

WHEREAS, extraction surcharges are necessary to reduce excessive pumping from the aquifer systems within the Agency and to bring the groundwater basins within the Agency to safe yield; and

WHEREAS, extraction surcharges are intended to discourage the use of groundwater beyond the extraction allocation and are not taxes, user charges or user fees; and

WHEREAS, the Fox Canyon Groundwater Management Agency Act authorizes the Agency to set the extraction surcharge rate at an amount that is necessary to achieve safe yield; and

WHEREAS, the Agency Ordinance Code provides that the extraction surcharge rate shall be based on: (1) the cost to import potable water from the Metropolitan Water District of Southern California (MWD), or other equivalent water sources that can or do provide non-native water within the Agency; and (2) the current groundwater conditions within the Agency; and

WHEREAS, Calleguas Municipal Water District (CMWD) is a member agency of MWD and is the largest purveyor of imported water within the Agency; and

WHEREAS, effective January 1, 2026, the CMWD Tier I rate to import water from MWD to the groundwater basins within the Agency (inclusive of all applicable MWD administrative and regulatory costs and fees) is $2,289.00 per acre-foot; and

WHEREAS, the groundwater basins within the Agency continue to be in overdraft condition; and

WHEREAS, the existing groundwater surcharge rate is not sufficient to deter over-pumping or excessive groundwater extractions when compared to a well operator's ability to purchase retail or imported water, or treat otherwise unusable water; and

WHEREAS, an economic disincentive is deemed the best means to discourage over pumping of groundwater and a single tier surcharge rate has not been effective with respect to those operators who greatly exceed their extraction allocation; and

WHEREAS, the Agency Ordinance Code provides for setting groundwater extraction surcharge rates by Resolution and provides that such rates may be tiered; and

WHEREAS, this Resolution is exempt from the provisions of the California Environmental Quality Act as an action taken to assure the maintenance, restoration, or enhancement of a natural resource and the environment.

NOW, THEREFORE, IT IS HEREBY RESOLVED AND ORDERED THAT:

1. Tiered Surcharge Rates are hereby established as follows:

   Tier I: A surcharge rate of $2,289.00 per acre-foot shall be imposed on annual groundwater extractions that exceed the allocation for an extraction facility, or the sum of allocations for combined facilities, for all water wells within the Agency by 25 acre-feet or less.

   Tier II: An additional surcharge of $250.00 per acre-foot shall be imposed on annual groundwater extractions that exceed the allocation for an extraction facility, or the sum of allocations for combined facilities, for all water wells within the Agency by more than 25 acre-feet but less than 100 acre-feet.

   Tier III: An additional surcharge of $500.00 per acre-foot shall be imposed on annual groundwater extractions that exceed the allocation for an extraction facility, or the sum of allocations for combined facilities, for all water wells within the Agency by 100 acre-feet or more.

2. These Tiered Surcharge Rates shall be effective on January 1, 2026.

On motion by Director _____ and seconded by Director _____, the foregoing Resolution was duly passed and adopted by the Board of Directors at a regularly scheduled meeting of the Board held on April 22, 2026, by the following vote.

AYES:
NOES:
ABSTAINS:
ABSENT:

_____
Eugene F. West, Chair, Board of Directors
Fox Canyon Groundwater Management Agency

ATTEST: I hereby certify that the above is a true and correct copy of Resolution No. 2026-02.

By: _____
Elka Weber, Clerk of the Board

Calleguas MWD

2026 Adopted Water Rates

	Effective Jan 1, 2025	Effective Jan 1, 2026	% Change
MWD Rates			
Tier 1 Supply Rate ($/AF)	$290	$313	7.9%
System Access Rate ($/AF)	$463	$492	6.3%
System Power Rate ($/AF)	$159	$179	12.6%
Treatment Surcharge ($/AF)	$483	$544	12.6%
MWD Treated Water Rates			
MWD Tier 1 ($/AF)	$1,395	$1,528	9.5%
CMWD Rates			
O&M Surcharge ($/AF)	$214	$227	6.1%
Capital Construction Surcharge ($/AF)	$286	$303	5.9%
Total Calleguas Rates	$500	$530	6.0%
Combined MWD & CMWD Rates			
Tier 1 Rate ($/AF)	**$1,895**	**$2,058**	**8.6%**
Tier 2 Rate ($/AF)			
Temporary Water Rate (per 100 cu ft)	**$8.70**	**$9.45**	**8.6%**
Capacity Charge			
Estimated MWD Capacity Charge	$ 2,464,800	$ 2,422,950	(1.7%)
CMWD Capacity Charge Requirement	$ 5,508,644	$ 5,086,017	(7.7%)
Estimated MWD & CMWD Capacity Charge	**$7,973,444**	**$7,508,967**	(5.8%)
Estimated Purveyor CFS	143.74	143.06	
Capacity Charge /cfs - MWD	$17,148	$16,937	
Capacity Charge /cfs - CMWD	$38,324	$35,552	
Combined MWD & CMWD Capacity Charge	**$55,472**	**$52,489**	**(5.4%)**
RTS Charge			
Estimated MWD RTS Charge	**$ 9,096,290**	**$ 9,833,890**	8.1%

AF of Sales to calculate Capacity Chg & RTS Rate	73,000 / 75,000

	2025	2026	% Chg
MWD Per AF Rate	$ 1,395	$ 1,528	
MWD Capacity Charge	$ 34	$ 32	
MWD RTS	$ 125	$ 131	
	$ 1,554	$ 1,691	8.82%
CMWD Per AF Rate	$ 500	$ 530	
CMWD Capacity Charge	$ 75	$ 68	
	$ 575	$ 598	4.00%
Total MWD & CMWD Combined Rates	**$ 2,129**	**$ 2,289**	**7.52%**

Calleguas MWD

2026 Adopted SMP & Wheeling Rates

	Effective Jan 1, 2025	Effective Jan 1, 2026	% Change
Current SMP rate ($/AF)			
Brine	$749.10	$813.50	8.6%
Non-Brine	$60.00	$65.20	8.7%
Outside District SMP rate ($/AF)			
Brine	$1,123.70	$1,220.40	8.6%
Non-Brine	$90.00	$97.70	8.6%
Wheeling Rate ($/AF)	$29.39	$33.90	15.3%

DEFINITIONS:

Tier 1 Supply Rate (Metropolitan) - recovers the of cost of maintaining a reliable amount of supply.

System Access Rate (Metropolitan) – recovers a portion of the costs associated with the delivery of supplies.

System Power Rate (Metropolitan) – recovers power costs for pumping supplies to Southern California.

Water Stewardship Rate (Metropolitan) – recovers the cost of Metropolitan's financial commitment to conservation, water recycling, groundwater clean-up and other local resource management programs.

Treatment Surcharge (Metropolitan) – recovers the costs of treating imported water.

Readiness-to-Serve Charge (Metropolitan) - a fixed charge that recovers the capital cost of the portion of system capacity that is on standby to provide emergency service and operational flexibility. Based upon a calendar ten year rolling average.

Capacity Charge (Metropolitan) - recovers the cost of the assets that are providing peak capacity within the distribution system. Based on peak day delivery in previous three years.

Operations and Maintenance Surcharge (Calleguas) - recovers the cost of operating and maintaining system facilities and District administrative functions.

Capital Construction Surcharge (Calleguas) - recovers a portion of the cost of infrastructure expansion to accommodate new demand and increase system reliability.

Capacity Charge (Calleguas) recovers the cost of infrastructure to meet peaking and emergency demands. Based on the peak week demand on the system between May 1 and September 30, for the prior calendar year

April 22, 2026

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

SUBJECT: Presentation of the 2026 John K. Flynn Groundwater Stewardship Award – (*New Item*)

RECOMMENDATION: The Board will announce the recipient of the John K. Flynn Groundwater Stewardship Award for 2026.

DISCUSSION:
In 2003, a Groundwater Stewardship Award was established to honor long-time County Supervisor and Fox Canyon Groundwater Management Agency Director John K. Flynn for his many accomplishments and contributions to the Agency. The annual award is meant to recognize an individual or entity that makes significant contributions to the protection of groundwater, enhancement of water quality, or assisting the Agency in efforts to manage water resources in the groundwater basins within the Agency's jurisdiction.

Past Award Recipients:

2025 – David Borchard
2024 – Kimball Loeb
2023 – Dan Detmer
2022 – Kathleen Riedel
2021 – Steve Bennett
2020 – Charlotte Craven
2019 – Alden Broome
2018 – Bryan Bondy
2017 – Lynn Maulhardt
2016 – Carol Schoen
2015 – Samuel A. McIntyre
2014 – Michael Solomon
2013 – County of Ventura Water and Sanitation Department
2012 – Susan Mulligan
2011 – Calleguas Municipal Water District
2010 – Camrosa Water District

2009 – John Mathews, Esq.
2008 – Dana Wisehart
2007 – Dr. Lowell Preston
2006 – Dr. Steve Bachman
2005 – Phil Drescher, Esq.
2004 – Jurgen Gramckow

The award is made according to the following guidelines:

1. The award shall be made to an individual or organization that, during the past year(s), demonstrates the greatest contribution to the preservation and improvement of quality and/or quantity of groundwater in the groundwater basins within the Agency's jurisdiction.
2. The Executive Officer shall compile a list of award nominees.
3. Nominations shall be solicited from Agency stakeholders (well operators and well owners) and shall be sent to the Executive Officer.
4. The Executive Officer shall submit the list of nominees to an ad hoc committee for ranking, and the Executive Officer shall compile the results of those rankings.
5. An individual person may receive the award only once. Organizations are not subject to this limitation.
6. The committee can select the annual recipient from the list of nominations or select another.

The Agency posted a request for nominations on its website. At the March 25, 2026 meeting, your Board appointed Directors Trembley and Maulhardt to the 2026 Flynn Award Nominating Ad-Hoc Committee. At today's meeting, your Board will announce the selection of the recipient of the 2026 John K. Flynn Groundwater Stewardship Award.

This letter has been reviewed by Agency Counsel. If you have any questions, please call me at (805) 650-4083.

Sincerely,

John Demers
Executive Officer

Attachment:

Exhibit 13A – Flynn Award Presentation 2026

Fox Canyon Groundwater Management Agency's Presentation of the 2026 John K. Flynn Annual Groundwater Stewardship Award

In 2003, the annual John K. Flynn Groundwater Stewardship Award was established to honor an individual or entity that has made significant contributions to protecting groundwater, enhancing water quality, or assisting the Agency in efforts to manage the water resources that are so vital to our area.

The 2026 recipient of the annual Fox Canyon Groundwater Management Agency's Groundwater Stewardship Award is an individual readily recognized for his collaborative approach and insightful, action-oriented expertise, which has made an indelible impact on the Agency.

Our honoree began assisting FCGMA with initiatives in 2015 and joined staff to lead the Water Market AMI Pilot Program in 2017. His calm, even demeanor, humor, and behind-the-scenes brainstorming supported staff for a decade. Most notably, our honoree stepped into the Interim Executive Officer role in March 2024, actively guiding the Agency through a tremendous period of rapid change via approachable, thoughtful leadership skills that helped to bring out the best in staff, stakeholders, and colleagues alike. Though "interim," our honoree's thoughtful, observant, approachable demeanor and hands-on approach helped him lead the Agency into a refreshed collaborative mindset that prioritized not only onboarding and mentoring a great team, incrementally solving the Agency's short-staffing issues, but also reshaping Agency management for future incumbents in collaboration with our Board of Directors. Our honoree helped reset the foundation for bridging strong relationships with stakeholders and member agencies. While at the helm, our honoree listened to feedback and actively applied it at all levels of the Agency, from greater transparency in reporting to overseeing the Agency's first monitoring wells and associated grant funding; from working with the Fiscal Committee to reshape the budget process and encouraging the development of fiscal policies, to engaging the Agency's resources in encouraging stakeholder projects that contribute to our sustainability goals. Our honoree retired in 2025, but still serves the Agency on a part-time, as needed basis. Collectively, we are a better organization for all of his efforts.

Please join me in congratulating the 2026 recipient of the annual Fox Canyon Groundwater Management Agency's John K. Flynn Groundwater Stewardship Award:

Arne Anselm

April 22, 2026

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

SUBJECT: Presentation on Watermaster Allocations Accounting for Water Year 2024-25 and Overuse Assessments for Water Year 2023-24 [LPV Watermaster] – *(Returning Item)*

RECOMMENDATION: Receive and file a presentation on Carryover and Overuse in the Las Posas Valley Basin.

BACKGROUND

The Las Posas Valley Adjudication Judgment (Judgment) defines "Overuse" as "a Use in Excess of that allowed under the Judgment." (Judgment, §4.15.1) Generally, Overuse occurs when a Water Right Holder Uses groundwater in excess of their Annual Allocation. Annual Allocations are determined for each Water Year by Watermaster following Committee Consultation pursuant to the protocols and formulas set forth in the Judgment. (See Judgment, § 4.2.) In addition, Overuse may occur where a Mutual Water Company reports an aggregate amount of Use on behalf of its Mutual Exclusive Shareholders that exceeds the Aggregate Mutual Supply, and where a Mutual Water Company Shareholder without an Annual Allocation Uses Groundwater. (See Judgment, § 4.15.1.1, 4.15.1.2.) Prior to a Party being assessed an Overuse Assessment, the Judgment provides Water Right Holders operational flexibility to cure the Overuse "in the Water Year [immediately] following the Water Year in which the Overuse occur[s]." (Judgment, § 4.15.2.) However, if a Water Right Holder fails to cure the Overuse as provided in the Judgment, then the Water Right Holder, Party, or Person shall be subject to an Overuse Assessment and/or injunctive relief, as the case may be. (Ibid.) "Failure to pay [an] Overuse Assessment will incur interest on the amount owed and further enforcement []," as well as additional enforcement including injunctive relief and liening the associated real property for unpaid Overuse Assessments. (Judgment, § 4.15.3.)

DISCUSSION

Water Year (WY) 2024 (Oct. 1, 2024 – Sept. 30, 2025) was the first cure period since the Judgment was entered and implementation began, curing overuse incurred in WY 2023 (Oct. 1, 2023 – Sept. 30, 2024). On March 25, 2026, your Board approved and authorized staff to submit the Groundwater Sustainability Plan Annual Report for the Las Posas

Valley Basin for Water Year 2024-25 (Annual Report) to the Department of Water Resources and the court. The Judgment requires that annual reports be developed with committee consultation and imposes additional reporting requirements to be included with the report before submission to DWR and filing with the Superior Court of California, County of Santa Barbara. (Judgment, §§ 4.9.1, Exh A, 2.7.10.) These additional reporting requirements include the Annual Accounting, an accounting that describes, "for each Water Right Holder the amount of Allocated Groundwater the Water Rights Holder was authorized to Use during the preceding Water Year, the amount of Allocated Groundwater the Water Rights Holder Used, and whether the Water Right Holder established Carryover as a result of under-Use (and the amount thereof) or incurred Overuse (and the amount thereof)." (Judgment, § 5.2.4.3.)

On September 24, 2025, staff informed your Board that they would likely be unable to complete a full accounting of Groundwater Extraction and Use because of incomplete reporting and the quality of data reported. The reported data also shows overuse by a Mutual Exclusive Shareholder without allocation. The submitted Annual Report shows that 76.4% of Water Right Holders that report directly to Watermaster submitted complete reports, and of these, 11.4% failed to cure overuse incurred in WY 2023 (Table 1). The same data shows that 23.6% of the reporting was incomplete, missing data from one or both reporting periods or in the case of 5 WMIDs, the data provided was not clear for staff to determine use (Table 1).

Categories	**WY2024 Accounting**
Overuse*	16 (11.4%)
No action required	91 (65%)
Missing information (cannot calculate)	33 (23.6%)
Total WMIDs	**140 (100%)**

*Note: Excludes WMID 4246 overuse, a Mutual Exclusive Shareholder without allocation.

On July 23, 2025, your Board, following consultation with the Policy Advisory Committee, adopted Resolution 2025-03, establishing the Watermaster overuse assessment at a rate equal to the prevailing per acre foot amount for Calleguas Municipal Water District's (CMWD) Tier I Water Rate. Per the provisions in the Judgment, Watermaster can and will assess overuse assessments on 17 WMIDs, but cannot assess overuse assessments on 33 WMIDs with incomplete reporting, as their carryover or overuse status is undetermined. Staff and Regional Government Services (RGS), a consultant administering Extraction And Use Reporting, repeatedly reached out to the authorized designees of the 33 WMIDs with incomplete reporting to request they submit Extraction And Use Reporting, to no avail. At the same time, staff is confident that the authorized designee addresses on file with Watermaster used to notice Water Right Holders on Groundwater Extraction and Use Reporting is accurate given that the same list is used for delivery of Basin Assessment invoices. Delinquent lists are different between the two. Agency staff are working with counsel to determine the next course of action regarding incomplete reports.

CONCLUSION
Agency staff recommends your Board receive and file this presentation.

This letter has been reviewed by Agency Counsel. If you have any questions, please call me at (805) 654-2954.

Sincerely,

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

April 22, 2026

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

SUBJECT: Presentation and Discussion on Adjustments to Basin Assessments for Water Right Holders Subject to United Water Conservation District Assessments [LPV Watermaster] – *(New Item)*

RECOMMENDATIONS: (1) Receive and file a presentation from Agency staff on Las Posas Valley Adjudication Judgment provisions authorizing adjustments to Basin Assessments for Water Right Holders subject to United Water Conservation District (UWCD) Assessments; and **(2)** Discuss and provide direction and policy to Agency Staff on how Basin Optimization Project Assessment adjustments should be implemented, retroactively and in the future.

BACKGROUND

The Las Posas Valley Adjudication Judgment (Judgment) determines and adjudicates all groundwater rights within the LPV Groundwater Basin (LPV Basin), "whether based on appropriation, overlying right, prescriptive right, or any other possible basis of right." (Judgment, ¶ A). The Judgment requires the Agency, as the court-appointed Watermaster, to prepare an annual budget following committee consultation to manage the basin, implement and administer the Judgment and that this budget be funded by Watermaster Basin Assessments uniformly applied to all Water Right Holders, regardless of their location within the Basin. (Judgment, §§ 7.2 and 7.5.) While the Judgment treats the LPV Basin as a single basin for management purposes, the Judgment also recognizes the potential for different management areas and jurisdictional boundaries that may have an impact on implementation and management. About 80% of the Water Right Allocations are exercised to extract groundwater from wells located within the Calleguas Municipal Water District (CMWD) service area, while the remainder are located within the United Water Conservation District's (UWCD) service area. The Judgment contemplates replenishment activities as determined by the Basin Optimization Plan (BOP) to bring the Basin to sustainability by 2040, however, the section of the LPV Basin under UWCD service area already pays replenishment fees to UWCD. As such, the Judgment provides that, "Watermaster may reduce the amount of the Basin Assessments levied on Water Right Holders that pay an assessment to UWCD if Watermaster determines, following

Committee Consultation, that such a reduction is appropriate as a matter of equity". (Judgment, § 7.9)

On June 25, 2025, Watermaster adopted the BOP and on September 24, 2025, approved a $7.25 Basin Assessment to fund the implementation and work on projects included in the BOP for WY 2025-26. This cost will likely substantially increase as implementation of BOP projects ramps up, as outlined in the BOP budget; however, Section 7.9 of the Judgment has not been addressed. The interpretation and application of the provisions of Section 7.9 will have a significant impact on BOP project revenue and BOP implementation in subsequent years, as well as on the fees that Water Rights Holders are assessed.

DISCUSSION

On March 06, 2026, Agency Staff submitted a consultation request to the Las Posas Valley Basin Policy Advisory Committee (PAC), requesting policy recommendations on the following (Exhibit 15A):

1. Should Watermaster reduce the amount of the Project Basin Assessments levied on Water Right Holders that pay an assessment to UWCD?
2. If PAC recommends Watermaster reduce the Project Basin Assessments levied on Water Right Holders that pay an assessment to UWCD, what fraction of the Project Basin Assessments should these Water Right Holders pay?

On March 19, 2026, the PAC submitted a recommendation report to Watermaster recommending that Water Right Holders in UWCDs service area that pay assessments to UWCD be exempt from Watermaster's Project Basin Assessments (Exhibit 15B). The PAC's rational for the recommendation is, "as a matter of equity, Water Rights Holders so situated should not be required to pay two separate agencies for replenishment programs when they cannot benefit proportionally from those increased contributions." (Exhibit 15B). At the same time, the PAC reserves the right to revisit this recommendation at a future date should there be significant changes in LPV Basin levels, UWCD basin assessments and / or replenishment activities by UWCD on the Basin.

The PAC is the primary advisory body to Watermaster on policy related matters of a non-technical nature (Judgment, §§ 6.10.1, 6.11.1.) and functions to "[p]rovide all Water Right Holders with a meaningful voice and representation on policy matters" and "[p]rovide input and recommendations to Watermaster to assist Watermaster in fulfilling its duties." (Judgment, §§ 6.10.1.1, 6.10.1.2.) Agency staff have no objection to the PAC recommendation as this is a policy matter for your Board to consider. Agency staff, however, note that exempting Water Right Holders in UWCD's service area from future Basin Optimization Project Assessments translates to an approximately 20% decrease in anticipated revenue for these assessments from this group which will have to be absorbed by the rest of the Water Right Holders required to pay Basin Optimization Project Assessments. In addition, Water Right Holders have already paid three quarters of the Basin Optimization Project Assessment for the first year of implementation thus any policy will have to address how these funds are handled retroactively and how to address the potential deficit that might be created should a refund be in order.

CONCLUSION

It is recommended that your Board, 1) receive and file this presentation; and 2) discuss and provide direction and policy to Agency Staff on how Basin Optimization Project Assessment adjustments should be implemented, retroactively and in the future. Staff will return this item for your Board's consideration at a later date.

This letter has been reviewed by Agency Counsel. If you have any questions, please call me at (805) 654-2954.

Sincerely,

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

Attachments:

Exhibit 15A – Watermaster Memo to PAC, dated March 6, 2026
Exhibit 15B – PAC Recommendation Report, dated March 19, 2026

FOX CANYON GROUNDWATER MANAGEMENT AGENCY

LAS POSAS VALLEY WATERMASTER

MEMORANDUM

Date: **March 06, 2026**

To: **Las Posas Valley Watermaster Policy Advisory Committee**

From: **Kudzai F. Kaseke, Assistant Groundwater Manager**

Subject: **Reduction of Basin Assessments Levied on Water Right Holders that Pay Assessments to United Water Conservation District**

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

The Las Posas Valley Adjudication Judgment (Judgment) determines and adjudicates all groundwater rights within the LPV Groundwater Basin (LPV Basin), "whether based on appropriation, overlying right, prescriptive right, or any other possible basis of right." (Judgment, ¶ A). While the LPV Basin is managed as one, the Judgment recognizes the existence of different management areas and jurisdictional boundaries that may have an impact on Judgment implementation; about 80% of the groundwater allocations fall within the Calleguas Municipal Water District Service area, while the remainder fall within the United Water Conservation District's (UWCD) Service Area. The Judgment contemplates replenishment activities as determined by the Basin Optimization Plan (BOP) to bring the basin to sustainability by 2040, however, the section of the basin under UWCD Service Area already pays such replenishment fees to UWCD. As such, the Judgment provides that, "Watermaster may reduce the amount of the Basin Assessments levied on Water Right Holders that pay an assessment to UWCD if Watermaster determines, following Committee Consultation, that such a reduction is appropriate as a matter of equity". (Judgment, § 7.9)

On June 25, 2025, Watermaster adopted the BOP and on September 24, 2025, approved a $7.25 Basin Assessment to fund the implementation and work on projects included in the BOP for WY 2025-26. This cost will increase, likely substantially, as implementation of BOP projects ramps up as outlined in the BOP budget; however, section 7.9 of the Judgment has not been addressed. The interpretation and application of the provisions of section 7.9 will have a significant impact on BOP project revenue and BOP implementation in subsequent years, as well as the fees that Water Rights Holders are assessed.

CONSULTATION REQUEST

Pursuant to Section 7.9 of the Judgment, Watermaster requests the PAC provide its recommendations on the following:

1. Should Watermaster reduce the amount of the Project Basin Assessments levied on Water Right Holders that pay an assessment to UWCD?
2. If PAC recommends Watermaster reduce the Project Basin Assessments levied on Water Right Holders that pay an assessment to UWCD, what fraction of the Project Basin Assessments should these Water Right Holders pay?

An item regarding this issue will be included on an upcoming FCGMA Board of Directors (acting as the Watermaster Board) meeting agenda. Watermaster requests your committee's recommendations and feedback via the email below by April 06, 2026.

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

TO: **Las Posas Valley Watermaster**

FROM: **Las Posas Valley Watermaster Policy Advisory Committee**

RE: **Recommendation Report – Las Posas Valley Basin Optimization Projects Assessment**

DATE: **March 19, 2026**

Recommendation:
The PAC recommends that Water Rights Holders in the western West Las Posas Management Area, whose land resides in the United Water Conservation District (UWCD) service area and who pay assessments to UWCD, shall not be levied any portion of the LPV Watermaster Project Basin Assessment.

Policy Rationale for Recommendation:
The PAC determined that, as a matter of equity, Water Rights Holders so situated should not be required to pay two separate agencies for replenishment programs when they cannot benefit proportionally from those increased contributions.

The PAC appreciates the needs for long-term planning and to that end determined that this recommendation should be the durable condition, excepting a significant change in basin levels, basin assessments from United, and/or the impact of replenishment activities by United on the basin. As such, the PAC reserves the right to revisit this recommendation at a future date should conditions warrant it.

Tally of Committee Member Votes:

	YES	NO	ABSTAIN	ABSENT
Ian Prichard, Calleguas MWD	X			
Paul Chan, VC WWD No. 1 & 19	X			
John Menne, Zone MWC				X
Rob Grether, West LPV Large Ag	X			
David Schwabauer, East LPV Large Ag	X			
Patricia Martinez, East LPV Small Ag	X			
Richard Cavaletto, West LPV Small Ag	X			
Laurel Servin, East LPV MWC	X			
Steven Murata, West LPV MWC	X			
Arturo Aseo, Commercial	X			

FOX CANYON GROUNDWATER MANAGEMENT AGENCY

A STATE OF CALIFORNIA WATER AGENCY

April 22, 2026

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

SUBJECT: Presentation on Preparation of a Regional Desalter Feasibility Study and Collaboration with Calleguas Municipal Water District [Watermaster] – *(New Item)*

RECOMMENDATION: Receive and file an Agency staff presentation on preparation of a Regional Desalter Feasibility Study and Collaboration with Calleguas Municipal Water District.

BACKGROUND

The Judgment requires Watermaster prepare a Basin Optimization Yield Study (BOYS) that will establish the operating yield, and in turn the amount and rate of rampdown, in each water year (WY) through WY 2039 such that the operating yield and sustainable yield for the Las Posas Valley (LPV) Basin match by WY 2040, resulting in sustainable management of the LPV Basin in accordance with the Sustainable Groundwater Management Act (SGMA). (Judgment, §§ 3.3, 4.10, 5.1.) Critical to the development of the of BOYS is the Basin Optimization Plan (BOP), which is intended to evaluate and select the "Basin Optimization Projects that are likely to be practical, reasonable, and cost-effective to implement prior to 2040 to maintain the Operating Yield at 40,000 AFY [acre-feet per year] or as close thereto as achievable." (Judgment § 5.3.2.2.)

On June 25, 2025, your Board, acting as the court-appointed Watermaster to LPV Basin, adopted the BOP, evaluating nine Basin Optimization Projects and recommending the implementation of five projects including Project 9: Regional Desalter Feasibility Study.

DISCUSSION

As described in the BOP, the Regional Desalter Study (Project 9) is a study to evaluate the feasibility of constructing and operating a regional groundwater desalter as an alternative to the Moorpark Desalter (Project 4). In addition to removing groundwater impacted by salts in the East Las Posas Management Area (ELPMA), a completed desalter project would provide high-quality water to be used by recipients in lieu of

groundwater pumping and extraction wells could create additional groundwater storage capacity in the Shallow Alluvial Aquifer (BOP, 2025). The scope of the Regional Desalter Study is outlined in section 2.2.9.2. of 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 as part of their Water Resources Implementation Strategy (WRIST). Because the ELPMA lies fully within CMWD service and 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 as Watermaster would be engaging similar if not the same purveyors. Watermaster staff believe that partnering with CMWD is the most efficient, cost-effective, and strategic approach for completing the regional desalter feasibility study and advancing this BOP project because it 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.

On January 28, Watermaster submitted a consultation memorandum to the PAC requesting the PAC's recommendation on whether staff should proceed with the approach of partnering with CMWD to conduct the Regional Desalter Feasibility Study (Exhibit 16A). On March 26, 2026, the PAC submitted a recommendation report dated February 5, 2026, conditionally supporting the two agencies' work together provided the PAC receives plan updates and have ongoing visibility into the project costs (Exhibit 16B).

It is important to note that the CMWD Desalter Project already covers much of the scope of work developed for the Watermaster Regional Desalter Basin Optimization Project and will be expanded to incorporate any additional scope specific to the Watermaster BOP project. Agency staff have collaborated with CMWD on the CMWD Desalter Project scope of work to ensure consideration of the Las Posas Valley Basin Optimization Plan (BOP) Regional Desalter timing and feasibility to support Watermaster's compliance with the Judgment. In addition, the CMWD Desalter Project concepts that advance to the Detailed Analysis phase that fit the criteria of the Watermaster Regional Desalter Feasibility Study, that additional cost for Watermaster specific tasks will be borne by Watermaster.

Staff will update your Board and the PAC on progress, costs and agreements as they develop.

CONCLUSION
Agency staff recommends your Board receive and file this presentation.

This letter has been reviewed by Agency Counsel. If you have any questions, please call me at (805) 654-2954.

Sincerely,

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

Attachment:

Exhibit 16A – Watermaster Memo to PAC, dated January 28, 2026
Exhibit 16B – PAC Recommendation Report, dated February 5, 2026

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.

TO: Las Posas Valley Watermaster

FROM: Las Posas Valley Watermaster Policy Advisory Committee

RE: Recommendation Report – Las Posas Valley Basin Optimization Project, Regional Desalter Feasibility Study

DATE: February 5, 2026

Recommendation:
The PAC recommends Watermaster partner with Calleguas on Calleguas's Study to Optimize Brackish Groundwater Desalting in the Upper Calleguas Watershed to fulfill the Basin Optimization Project (BOP) "Regional Desalter Feasibility Study." The PAC makes this recommendation on the condition that the PAC will receive plan updates and have ongoing visibility into project costs.

Policy Rationale for Recommendation:
There is significant overlap between the BOP desalter study and the Calleguas desalter study. The proposed partnership is an efficient and strategic approach for completing the regional desalter feasibility study required by the Judgment while avoiding duplicative work and costs.

Summary of Facts in Support of Recommendation:
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.

Tally of Committee Member Votes:

	YES	NO	ABSTAIN	ABSENT
Ian Prichard, Calleguas MWD	X			
John Menne, Zone MWC	X			
Arturo Aseo, Commercial	X			
Rob Grether, West LPV Large Ag	X			
David Schwabauer, East LPV Large Ag	X			
Patty Martinez, East LPV Small Ag				X
Richard Cavaletto, West LPV Small Ag	X			
Laurel Servin, East LPV MWC	X			
Steven Murata, West LPV MWC				X
Paul Chan, VCWWD 1 and 19				X

April 22, 2026

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

SUBJECT: Receive and File a Presentation on the Las Posas Valley Draft Basin Optimization Yield Study – *(Returning Item)*

RECOMMENDATIONS: (1) Receive and file a presentation from Agency staff on the draft Las Posas Valley Basin Optimization Yield Study, and **(2)** Provide direction to staff.

BACKGROUND

The Las Posas Valley Judgment (Judgment) requires Watermaster to prepare a Basin Optimization Yield Study (BOYS), a technical study to establish the Basin Optimization Yield, with committee consultation (Judgment, §§ 3.3, 4.10, 5.1.). The Basin Optimization Yield is defined as, "the estimated yield projected to be available to achieve Sustainable Groundwater Management by 2040" (Judgment, § 1.21) or the production rate, with implementation of Basin Optimization Projects, that can be reasonably implemented by 2040 and maintains groundwater elevations above the minimum thresholds established in the Groundwater Sustainability Plan (GSP). The BOYS follows the Basin Optimization Plan (BOP) whose purpose is to evaluate and select Basin Optimization Projects that are likely to be practical, reasonable, and cost-effective to implement prior to 2040 with the goal of maintaining the operating yield at 40,000 acre-feet per year (AFY) or as close thereto as possible.

While exigent circumstances delayed the completion of this study, staff updated your Board and the advisory committees, Policy Advisory Committee (PAC) and Technical Advisory Committee (TAC), of these challenges and provided alternatives for your Board in consultation with the PAC and TAC to consider; your Board directed staff and consultant Dudek to pursue recommended alternatives to ensure completion of the study per the Judgment. This BOYS is the first iteration of a technical document intended to establish the Basin Optimization Yield as defined in the Judgment, with at least two more iterations scheduled for 2030 and 2035, to allow for adaptative management of the Basin. On March 25, 2026, staff presented the draft BOYS to your Board and stakeholders per the updated schedule (attached as Exhibit 17A) and indicated that the Item would return

for discussion and your Board's direction at the April 2026 Watermaster meeting, with the goal to have the final version ready for adoption in May 2026.

DISCUSSION

The Basin Optimization Yield was evaluated using numerical groundwater model simulations that incorporated differing groundwater production rates and two projects selected in the Basin Optimization Plan that provided quantifiable groundwater benefits at a level of detail that could be included in the modeling; BOP Project 2, Purchase of Imported Water from Calleguas Municipal Water District (CMWD) for Basin Replenishment, and BOP Project 5, Arroyo Simi-Las Posas Water Acquisition. The scenarios evaluated included a Baseline Scenario, in which groundwater production equaled the initial Operating Yield of 40,000 AFY set by the Judgment, a Projects Scenario with BOP Projects 2 and 5, and two Rampdown Scenarios recommended by the TAC provided as informational items.

As has been the practice for numerical groundwater modeling in the Basin, two models were utilized for this study:

1) The Groundwater Flow model developed by Intera for CMWD applied in the East Las Posas Management Area (ELPMA), and
2) the Coastal Plain Model developed and maintained by United Water Conservation District (UWCD) applied in the West Las Posas Management Area (WLPMA). The same versions of these two models were used for the First Periodic Evaluation of the Groundwater Sustainability Plan.

Results indicate that groundwater production rates at the Baseline Scenario (40,000 AFY) are unsustainable with groundwater elevation levels across management areas falling below the minimum thresholds set in the GSP. The Projects Scenario suggests sustainability can be achieved by fully implementing Project 2, targeting areas showing chronic declines in groundwater elevation levels while maintaining flow in the Arroyo Simi-Las Posas. The estimated Basin Optimization Yield, at 40,000 AFY, less the reductions at the in-lieu project wells of 3,140 AFY [1,760 AFY in the WLPMA and 1,380 AFY in the ELPMA], results in a net yield or groundwater production or Basin Optimization Yield of 36,860 AFY. If the projects are fully implemented per the schedule, the groundwater modeling forecasts that rampdown will not be needed. However, it is important to note that the participation of the modeled in-lieu recipients in the Projects Scenario will be critical for the successful implementation of the projects.

The BOYS notes that numerical groundwater model predictions are better at evaluating trends than absolute water levels and both models used have uncertainty related to data inputs, etc., as acknowledged by both PAC and TAC to Watermaster. While all numerical models have result uncertainty, the groundwater production distribution as presented in this study is another area of significant uncertainty due to the distribution being based on a single year of water use reporting since Judgment implementation, Water Year 2023-24. The Judgment significantly altered groundwater allocations from the historical pumping patterns; thus, this uncertainty can only be reduced by additional groundwater extraction and use reporting for use in successive iterations of the BOYS. In addition,

UWCD changed the boundary condition from the model version used for the GSP to allow flow in the lower aquifers from the WLPMA to the ELPMA across the Somis Fault Zone, which is inconsistent with hydrogeologic conditions. These uncertainties were highlighted by staff and Dudek to your Board, PAC and TAC at various points during development of the BOYS and all parties agreed that even with these uncertainties the model remained the best available tool to estimate the Basin Optimization Yield.

Ongoing monitoring of Key Wells will confirm that measured groundwater elevations are consistent with forecasted groundwater elevations, simulated by the numerical models to provide assurance that undesirable results will not occur after 2040. Subsequent iterations of the BOYS in 2030 and 2035, as well as robust groundwater elevation level monitoring, will be important for adaptative Basin management.

If projects are not fully implemented as scheduled, Watermaster must then institute rampdown to achieve sustainability per the Judgment. A Basin-wide Rampdown Scenario indicates that a 20% (8,000 AF) reduction in pumping from the initial Operating Yield of 40,000 AFY would bring the Basin into sustainability but would reduce production rates to 32,000 AFY with a Rampdown Rate of 571 AFY for each of the 14 water years from fall 2026 through fall 2039. However, because the management areas are distinct, an across-the-board, Basin-wide rampdown might be an inappropriate or oversimplified approach to achieve sustainability in the Basin, hence the Differential Rampdown Scenario, meant to study localized restrictions on extractions (per Section 4.10.3 of the Judgment), suggested by the TAC. The Differential Rampdown Scenario found that a 6,507 AFY groundwater pumping reduction of 20% (3,683 AFY) in the WLPMA, 11% (2,261 AFY) in the ELPMA, and (113 AFY) in the Epworth Gravels Management Area would avoid undesirable results and thus achieve sustainability. Staff notes that implementation of a differential rampdown would require, with committee consultation, specific findings by your Board.

The PAC and TAC have provided extensive comments and recommendations that have been incorporated and addressed in the current version of the BOYS before your Board (Exhibits 17B and 17D, respectively). The accompanying Watermaster response reports contain considered responses to each of the PAC and TAC's recommendations (Exhibits 17C and 17E, respectively). The PAC provided four recommendations generally focused on interpretation of the Judgment and related to rampdown: when and how to initiate, Basin-wide versus Differential and use of rampdown as a last resort and 18 specific comments (Exhibit 17B). Watermaster incorporated these recommendations and comments into the current version of the BOYS providing clarifying language, updating text and providing a response report detailing how staff addressed these recommendations in the study and the source of the request for Differential Rampdown which was a request by the TAC to Watermaster (Exhibit 17C). The TAC on the other hand provided a recommendation report with ten recommendations and 76 specific comments related to: clarifications on model assumptions, effects of the Somis Fault model boundary conditions on in-lieu and rampdown simulations, conditions in the Epworth Gravels, potential effects of carryover and addressing the specific comments of TAC members (Exhibit 17D). Similarly, the current version of the BOYS incorporates these recommendations while the Watermaster response report details how they have

been incorporated and addressed in the study and the matrix has individual responses to each of the TACs specific comments (Exhibit 17E). In addition, part of these technical recommendations have been addressed by staff earlier in this Board letter.

SUMMARY

The Basin Optimization Yield Study is a technical document that evaluates the sustainability of current groundwater extraction rates, establishes the Basin Optimization Yield based on modeled projects, calculates Basin-wide rampdown and rampdown rate that would be needed in the absence of project implementation, and as requested by the TAC, a scenario for differential rampdown or localized restrictions, under Section 4.10.3 of the Judgment. The study, however, does not and is not intended to provide policy recommendations, but rather is the technical basis for which your Board, in consultation with the advisory committees, can develop informed policy for sustainable and adaptive management of the Basin.

CONCLUSION

Staff recommends that your Board 1) receive and file this report, and 2) provide direction to staff before this Item is brought back for adoption at the May 2026 Watermaster Board meeting.

This letter has been reviewed by Agency Counsel. If you have any questions, please call me at (805) 654-2954.

Sincerely,

Kudzai Farai Kaseke (PhD, PH, PMP, CSM)
Assistant Groundwater Manager

Attachment:

Exhibit 17A – Draft Las Posas Valley Basin Optimization Yield Study
Exhibit 17B – PAC Recommendation Report, February 5, 2026
Exhibit 17C – Watermaster Response Report to PAC, March 18, 2026
Exhibit 17D – TAC Recommendation Report, February 3, 2026
Exhibit 17E – Watermaster Response Report to TAC, March 18, 2026

Basin Optimization Yield Study

Las Posas Valley Basin

MARCH 2026

Prepared for:

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

Prepared by:

DUDEK
687 S. Coast Highway 101, Suite 110
Encinitas, California 92024

Jill Weinberger, Ph.D., P.G. #8940

Table of Contents

SECTION **PAGE NO.**

TABLES

FIGURES

APPENDICES

Acronyms and Abbreviations

Acronym/Abbreviation	Definition
AF	Acre-Feet
AFY	Acre-Feet per Year
ASRVB	Arroyo Santa Rosa Valley Basin
Basin	Las Posas Valley Groundwater Basin (DWR Basin No. 4-008)
BOY	Basin Optimization Yield
CMWD	Calleguas Municipal Water District
CWD	Camrosa Water District
ELP	East Las Posas
ELPMA	East Las Posas Management Area
ET	Evapotranspiration
FCGMA	Fox Canyon Groundwater Management Agency
First Periodic Evaluation	First Periodic Evaluation of the Groundwater Sustainability Plan for the Las Posas Valley Groundwater Basin
Judgment	Judgment in Las Posas Valley Water Rights Coalition, et al., v. Fox Canyon Groundwater Management Agency, Santa Barbara Sup. Ct. Case No. VENC100509700
LAS	Lower Aquifer System
LPV	Las Posas Valley
MWC	Mutual Water Company
MT	Minimum Threshold Groundwater Elevation defined at Key Wells in the GSP for the Las Posas Valley Basin
PAC	LPV Policy Advisory Committee
PVB	Pleasant Valley Basin
SGMA	Sustainable Groundwater Management Act
SVWQCP	Simi Valley Water Quality Control Plant
TAC	LPV Technical Advisory Committee
UAS	Upper Aquifer System (in the Oxnard Subbasin)
UWMP	Urban Water Management Plan
VCWWD-1	Ventura County Waterworks District No. 1
VCWWD-19	Ventura County Waterworks District No. 19
VRGWFM	Ventura Regional Groundwater Flow Model
WLPMA	West Las Posas Management Area
WMID	Water Management Identification Number

INTENTIONALLY LEFT BLANK

Executive Summary

This Basin Optimization Yield (BOY) Study has been prepared to determine the Basin Optimization Yield and evaluate the need for Rampdown in the Las Posas Valley Groundwater Basin (Basin) in conformance with the Judgment adjudicating groundwater rights in the Basin. The initial scope of this BOY Study was reviewed by both the Technical Advisory Committee (TAC) and Policy Advisory Committee (PAC) for the Basin. The December 2025 draft of the BOY Study was reviewed by, and recommendation reports submitted by, both the TAC and PAC. The BOY Study was revised based on the TAC and PAC comments.

The Basin Optimization Yield was evaluated using numerical groundwater model simulations that incorporated differing groundwater production rates and two projects selected in the Basin Optimization Plan (BOP) that provided quantifiable groundwater benefits at a level of detail that could be included in the modeling. These projects are BOP Project 2, Purchase of Imported Water from Calleguas Municipal Water District (CMWD) for Basin Replenishment, and BOP Project 5, Arroyo Simi-Las Posas Water Acquisition. The scenarios evaluated included a Baseline Scenario, in which groundwater production equaled the initial Operating Yield of 40,000 Acre-Feet per Year (AFY) set by the Judgment, a Projects Scenario with BOP Projects 2 and 5, and two Rampdown Scenarios.

Two numerical groundwater models were utilized for this BOY Study. The groundwater model developed by CMWD was used for the East Las Posas Management Area (ELPMA), and the Coastal Plain Model developed and maintained by United Water Conservation District (UWCD) was used for the West Las Posas Management Area (WLPMA). The same versions of these two models were used for the First Periodic Evaluation of the Groundwater Sustainability Plan (GSP). All numerical models have uncertainty in their results, which is discussed in this report. The distribution of groundwater production is an area of significant uncertainty, as there was only a single year of water use reporting since Judgment implementation. The Judgment significantly changed the groundwater allocations from those associated with historical pumping. Additionally, UWCD changed the boundary condition from the model version used for the GSP to allow flow in the lower aquifers from the WLPMA to the ELPMA across the Somis Fault Zone, which is inconsistent with hydrogeologic conditions.

Groundwater production in the Baseline Scenario at the initial Operating Yield of 40,000 AFY was determined to be unsustainable because simulated future groundwater elevations at several Key Wells, or representative monitoring points, fell below the minimum thresholds established in the GSP for the Basin. Groundwater elevations must be maintained above the minimum thresholds by 2040 for the Basin to achieve mandated sustainable management and prevent Undesirable Results, as defined in Water Code section 10721(x), referenced in the Judgment, and specified in the Groundwater Sustainability Plan.

For the Projects Scenario, groundwater production was reduced at nine wells owned and operated by Zone Mutual Water Company (MWC), Ventura County Waterworks District 1 (VCWWD-1), and Ventura County Waterworks District 19 (VCWWD-19), and replaced with imported water deliveries consistent with BOP Project 2. BOP Project 5 assures continuation of current discharges to the Arroyo Simi-Las Posas in Simi Valley that flow into the Basin. Based on the results of the Projects Scenario, the Basin Optimization Yield is estimated at 40,000 AFY inclusive of the reductions at the in-lieu project wells of 3,140 AFY, and any additional yield for the remaining allocations of 36,860. Participation of VCWWD-1, VCWWD-19, and Zone MWC would be under the policy and terms to be established by Watermaster and agreements with these purveyors.

Two Rampdown Scenarios were modeled to evaluate pumping reduction that would be needed if BOP Projects 2 and 5 are not implemented as scheduled. The results of the Basin-wide Rampdown Scenario indicate that a 20%

reduction in pumping from the initial Operating Yield of 40,000 AFY avoided Undesirable Results in all three management areas of the Basin. This is a Basin-wide extraction rate of 32,000 AFY with a Rampdown Rate of 571 AFY for each of the 14 water years from fall 2026 through fall 2039. At TAC's recommendation and request, a Differential Rampdown Scenario was conducted to evaluate different reductions in the ELPMA (including the Epworth Gravels Management Area) and the WLPMA, for informational purposes. Specific provisions of the Judgment would need to be addressed prior to implementing a differential Rampdown. The Differential-Rampdown Scenario found that a reduction of 20% (3,683 AFY) in the WLPMA and by 11% in the ELPMA (2,261 AFY) and the Epworth Gravels Management Area (113 AFY) would avoid Undesirable Results.

In conclusion, if the projects are fully implemented as scheduled, numerical modeling conducted for this BOY Study forecasts that Rampdown is unnecessary to maintain a Basin Optimization Yield of 40,000 AFY, inclusive of the pumping reduced through in-lieu deliveries of imported water. However, ongoing monitoring of the Key Wells will confirm that measured groundwater elevations are consistent with forecasted groundwater elevations simulated by the numerical models to provide assurance that Undesirable Results will not occur after 2040. Per the Judgment, the Basin Optimization Yield must be re-evaluated in 2030 and 2035. The 2030 BOY Study must be completed by February 1, 2030.

1 Introduction

This initial BOY Study is prepared in conformance with the Judgment adjudicating groundwater rights in the Basin and in consultation with the TAC and PAC (Basin; Figure 1-1). TAC and PAC provided feedback and recommendations on the initial scope of this Study and TAC provided feedback on initial model simulations. TAC feedback and recommendations shaped the subsequent model simulations and discussion.

The purpose of this BOY Study is to determine the Basin Optimization Yield, which is defined in the Judgment as "*the estimated yield that is projected to be available to achieve Sustainable Groundwater Management by 2040*" (Judgment § 1.21). The BOY Study evaluates groundwater conditions under three potential future production scenarios: (1) continued production at 40,000 acre-feet per year (AFY), the initial Operating Yield defined in the Judgment, (2) implementation of two groundwater in-lieu projects evaluated in the Basin Optimization Plan (BOP), and (3) a ramp-down scenario to determine the BOY in the event that the projects are not implemented. The Rampdown calculated in this first BOY Study is the reduction of the initial Operating Yield necessary to "*(i) achieve Sustainable Groundwater Management and the reasonable and beneficial use of the Basin's water resources and (ii) avoid Undesirable Results*" (Judgment § 1.88) in the event that projects are not implemented. The Rampdown Rate is the annual amount of Rampdown of Operating Yield during each Water Year necessary to achieve the Basin Optimization Yield by 2040.

The BOY Study must be performed every 5 years, following Committee Consultation, to reassess the Basin Optimization Yield (Judgment § 1.22). The next BOY Study must be completed, "*on or before February 1, 2030, to establish the Rampdown Rate for the period from Water Years 2030 through 2034*"[1] (Judgment § 4.10.2). The 2030 BOY Study will be prepared in conjunction with the second Periodic Evaluation of the Groundwater Sustainability Plan, which is due to the California Department of Water Resources no later than January 13, 2030. Additionally, the Basin Optimization Plan can be amended or additional projects included if they meet the required criteria, as determined in Watermaster's discretion, subject to Committee Consultation (Judgment § 5.3.2.2). Amendment or addition of projects to the Basin Optimization Plan may trigger an update of the BOY Study, which can be updated "*at Watermaster's discretion in response to material changing or changed Basin conditions*" (Judgment § 1.22).

1.1 LPV Judgment

On July 10, 2023, the Santa Barbara Superior Court issued a statement of decision adopting a judgment in Las Posas Valley Water Rights Coalition, et al., v. Fox Canyon Groundwater Management Agency, Santa Barbara Sup. Ct. Case No. VENC100509700 (Judgment), and the Judgment has since been affirmed on appeal. The Judgment adjudicates all groundwater rights in the Las Posas Valley (LPV) Basin and requires the Basin to be sustainable managed consistent with the Sustainable Groundwater Management Act (SGMA). The Judgment appoints Fox Canyon Groundwater Management Agency (FCGMA) as the Watermaster to implement and administer the Judgment, and also recognizes FCGMA's authorities as the statutory groundwater management agency and Groundwater Sustainability Agency for the Basin.

[1] A water year begins October 1 and ends September 30 to reflect the precipitation patterns in California. Under DWR's definition of a water year, water year 2030 begins October 1, 2029, and ends September 30, 2030. Under the Judgment, water year 2030 begins on October 1, 2030, and ends on September 30, 2031. This document adopts DWR's naming convention for a water year.

As outlined in the Judgment, Watermaster, following Committee Consultation, is responsible for determining the Basin Optimization Yield of the Basin. The BOY Study is designed to evaluate future groundwater conditions, including projects selected for the Basin Optimization Plan, to set the Basin Optimization Yield, Rampdown, and Operating Yield, for the following water year and subsequent water years (Judgment § 2.22).

1.2 Summary of Basin Optimization Plan

Watermaster, in accordance with the Judgment and in consultation with the LPV Policy Advisory Committee (PAC) and TAC, developed a Basin Optimization Plan (FCGMA 2025a) that identified, evaluated, and prioritized projects that are "*practical, reasonable, and cost-effective to implement prior to 2040 to maintain the Operating Yield at 40,000 AFY or as close thereto as achievable*" (Judgment § 5.3.2.2). Potential projects for evaluation in the Basin Optimization Plan were identified by FCGMA and stakeholders via the Judgment, the LPV Groundwater Sustainability Plan (GSP), and the First Periodic Evaluation of the LPV GSP (First Periodic Evaluation; Table 1-1).

Table 1-1. Summary of Projects Evaluated

Project No.	Project Title	Project Ranking	Selected for BOP	Selected for BOY Modeling	Source(s)
1	Arroyo-Simi Las Posas Arundo Removal	7	Yes	No	Judgment No. 1 (§ 5.4.1) GSP Project No. 2 GSP Evaluation Project No. 2
2	Purchase of Imported Water from CMWD for Basin Replenishment[a]	1	Yes	Yes	Judgment Nos. 1&2 (§§ 5.4.2 & 5.4.9) GSP Project No. 1 GSP Evaluation Project No. 1
3	Arroyo Las Posas Storm Water Capture and Recharge	8	Yes	No	Judgment No. 3 (§ 5.4.3) GSP Evaluation Project No. 6
4	Moorpark Desalter	9	Yes	No	Judgment No. 4 (§ 5.4.4) GSP Evaluation Project No. 5
5	Arroyo Simi-Las Posas Water Acquisition	2	Yes	Yes	Judgment No. 5 (§ 5.4.5) GSP Project No. 3 GSP Evaluation Project No. 3
6	Delivery of Recycled Water to Las Posas Valley Users via Pipeline	6	No	No	Judgment No. 6 (§ 5.4.6)
7	In Lieu Deliveries to Northern East Las Posas Management Area Feasibility Study	4	No	No	Judgment No. 7 (§ 5.4.7) GSP Evaluation Project No. 9
8	Allocation Buyback and Reduction Program	3	No	No	Judgment No. 8 (§ 5.4.8)
9	Regional Desalter Feasibility Study	5	No	NO	GSP Evaluation Project No. 7

Notes: FCGMA = Fox Canyon Groundwater Management Agency; VCWWD-1 = Ventura County Waterwork District No. 1; AFY = Acre-Feet per Year; ET = evapotranspiration; SVWQCP = Simi Valley Water Quality Control Plant.

[a] Projects identified in Judgment sections 5.4.2 and 5.4.9 were combined based on TAC recommendation (TAC, August 27, 2024).

Watermaster developed evaluation criteria in four primary categories: (1) water supply, (2) timing and feasibility, (3) cost and funding, and (4) additional project considerations, to conduct the initial assessment of the original nine projects. After scoring, ranking, and prioritizing the potential projects, three projects and two feasibility studies were determined to be practical, reasonable, and cost-effective to implement prior to 2040. Five-year implementation schedules and costs for the selected projects and feasibility studies were developed in the Basin Optimization Plan.

Additionally, the Basin Optimization Plan evaluated which projects could be included in the numerical groundwater modeling conducted for the BOY Study. Two projects provided quantifiable supplemental groundwater at a level of detail that could be included in the model: Project 2, Purchase of Imported Water from CMWD for Basin Replenishment, and Project 5, and Arroyo Simi-Las Posas Water Acquisition Project. These Basin Optimization Projects are discussed further in Section 3.1.3.

1.3 Approach to Estimating the LPVB Basin Optimization Yield, Rampdown, and Rampdown Rate

As defined in the Judgment, the Basin Optimization Yield is *"the estimated yield that is projected to be available to achieve Sustainable Groundwater Management by 2040"* (Judgment § 1.21). Restated, the Basin Optimization Yield is the estimated groundwater production rate that can be maintained without causing Undesirable Results if the Basin Optimization Projects are implemented. Undesirable results were defined in the GSP for the three management areas of the Basin: the East Las Posas Management Area (ELPMA), the Epworth Gravels Management Area, and the West Las Posas Management Area (WLPMA; FCGMA 2019). Minimum threshold (MT) groundwater elevations were selected at representative monitoring points, or Key Wells, in each management area. The MTs represent the groundwater elevation below which Undesirable Results related to four sustainability indicators – chronic declines in groundwater elevation, loss of groundwater in storage, degradation of groundwater quality, and potential land subsidence related to groundwater production – may occur. Additionally, the MTs in the WLPMA were selected in concert with the MTs for the adjacent Oxnard Subbasin, to ensure that they do not interfere with the ability of the Oxnard Subbasin to meet its sustainability goal.

Because the MTs are the metric by which groundwater conditions in the Basin are determined to be sustainable, the BOY Study compares simulated future groundwater elevations in the Basin to the MTs at the Key Wells in the Basin. Future groundwater elevations were simulated using the two numerical groundwater models that cover the three management areas of the Basin. Simulated production rates that result in long-term stability of the groundwater elevations at levels above the MTs are considered sustainable. It is important to recognize, however, that numerical models are better at predicting changes and trends in future groundwater elevations than they are at predicting actual future groundwater elevations. The Basin Optimization Yield is the production rate, with implementation of the Basin Optimization Projects, that can be reasonably implemented by 2040 and maintains groundwater elevations above the MTs.

The need for a Rampdown was evaluated based on the difference between an Operating Yield of 40,000 AFY and the Basin Optimization Yield. Based on TAC recommendation, Rampdown was additionally evaluated should the Basin Optimization Projects not be implemented by 2040. This Rampdown evaluation was based on the difference between the initial Operating Yield and the sustainable groundwater production rate that could be maintained if projects are not implemented by 2040. The Rampdown Rate was calculated over a 14-year period (DWR water year

2027 through water year 2039[2]) assuming that if Rampdown is warranted, the first pumping reductions would be in place by the fall of 2026, and the Basin would reach the final sustainable production rate by the fall of 2039.

The following sections discuss the numerical groundwater models, future model scenarios, calculation of the Basin Optimization Yield, and calculation of the Rampdown Rate in more detail.

[2] See footnote 1.

2 Summary of Numerical Models

The eastern and western portions of the Basin are hydrogeologically distinct, separated by the Somis Fault. Consequently, the Basin is covered by two distinct numerical groundwater models:

- **East Las Posas (ELP) Model:** a MODFLOW numerical model developed by CMWD, which covers the entirety of the ELPMA and Epworth Gravels Management Area (CMWD 2018).
- **Coastal Plain Model:** a version of the Ventura Regional Groundwater Flow Model (VRGWFM) MODFLOW numerical model developed and maintained by UWCD, which covers the entirety of the WLPMA, Oxnard Subbasin, Pleasant Valley Basin (PVB), and Mound Subbasin (UWCD 2018).

Both models are basin-scale models that reasonably reproduce historical trends in groundwater elevations in response to groundwater production, climate, recharge, and other basin management operations. As noted previously, numerical models are better at predicting changes and trends in future groundwater elevations than they are at predicting actual future groundwater levels. These models were used to assess potential future groundwater levels in the GSP and the First Periodic Evaluation (FCGMA 2019 and FCGMA 2024, respectively). As part of the First Periodic Evaluation, both the Coastal Plain Model and ELP Model were updated to re-evaluate projected future conditions. Additional information on the updates to the models is provided in Section 5.1 of the First Periodic Evaluation (FCGMA 2024). This BOY Study uses the same version of each model used for the First Periodic Evaluation.

2.1 East Las Posas Model

The East Las Posas (ELP) Model, which covers the entirety of the ELPMA and portions of the FCGMA expansion area to the north and east of the ELPMA, was used to conduct the numerical groundwater flow modeling for the ELPMA and Epworth Gravels Management Areas. The Epworth Gravels Management Area is fully within the ELPMA and consists exclusively of the Epworth Gravels aquifer – the underlying aquifers are part of the ELPMA. CMWD provided the ELP model to FCGMA to support management of the Basin. This model was used by FCGMA to support management of the LPVB under both the GSP and the First Periodic Evaluation. As part of the First Periodic Evaluation, FCGMA reviewed data collected since the GSP was prepared and determined that revisions to the model structure were not required (FCGMA 2024). Therefore, the only change FCGMA made to the model for the First Periodic Evaluation was to extend the simulation period through the end of water year 2022 (i.e., September 30, 2022) (FCGMA 2024). The BOY Study uses the version of the ELP Model that was used in the First Periodic Evaluation. The GSP established uncertainty bounds in the sustainable yield for the ELPMA (including the Epworth Gravels Management Area) estimated using the ELP Model of ±2,300 AFY (FCGMA 2019). This intrinsic model uncertainty should be kept in mind when evaluating the results of scenario simulations conducted for this BOY Study.

Consistent with the hydrogeologic conceptual model, the western boundary of the ELP Model in the Fox Canyon aquifer and Grimes Canyon aquifer is a no-flow boundary. Therefore, the ELP Model does not simulate flow between the ELPMA and the WLPMA.

2.2 Coastal Plain Model

UWCD actively maintains the VRGWFM to support regional groundwater management decisions. This model was first used to assess the sustainable yield for the WLPMA during development of the GSP for the Basin (FCGMA 2019). At the time the GSP was developed, the VRGWFM covered the entirety of the Oxnard and Mound Subbasins and the majority of the WLPMA and PVB (UWCD 2018). Between 2018 and 2020, UWCD updated the VRGWFM to cover the entirety of WLPMA and PVB and included the Santa Paula, Piru, and Fillmore Subbasins (UWCD 2021). The updated model included an improved representation of local hydrogeologic conditions in the Santa Paula, Piru, and Fillmore subbasins and, in the Oxnard Subbasin, a better representation of the influence of coastal groundwater elevations on seawater intrusion. The GSP established uncertainty bounds in the sustainable yield for the WLPMA estimated using the GSP version of the VRGWFM of ±1,200 AFY (FCGMA 2019). While the uncertainty of the updated Coastal Plain Model used in the First Periodic Evaluation and this BOY Study has not been re-evaluated, the intrinsic model uncertainty from the GSP version should be kept in mind when evaluating the results of scenario simulations conducted for this BOY Study.

The updated VRGWFM simulated the effects of Santa Clara River flows on groundwater conditions in the Santa Paula, Piru, and Fillmore subbasins, with a daily model timestep, which is necessary to capture the complexity of river flows, but increases the computational requirements for each model run. Because of the computational requirements of the larger VRGWFM, UWCD also maintains a localized version of the VRGWFM that excludes the upper Santa Clara River subbasins (Santa Paula, Piru, and Fillmore) and uses a monthly timestep. This branch-off of the VRGWFM is informally referred to as the Coastal Plain Model. The Coastal Plain Model, which is distinct from the VRGWFM, has a design and structure that are consistent with the model used during development of the GSP, and is the model that was used for the First Periodic Evaluation of the GSP. Therefore, the Coastal Plain Model was used to assess the influence of groundwater pumping and projects on groundwater conditions in the WLPMA for this BOY Study.

Although the Coastal Plain Model included improved hydrogeologic conceptual model data in several groundwater basins, the update also included a revision to the model boundary condition at the eastern edge of the WLPMA. In previous versions of the model, the boundary between the ELPMA and WLPMA was represented using a no-flow boundary condition, which is consistent with the observation that the Somis Fault acts as a barrier to groundwater flow between the two management areas (FCGMA 2019). In contrast, the model boundary condition in the version of the model used in the First Periodic Evaluation and in this BOY Study was updated by UWCD to a general head boundary across approximately the southern third of the boundary with the Somis Fault. This change allows flow into or out of the WLPMA depending on the simulated groundwater elevations in the eastern portion of the WLPMA. As a result, the model predicts periods of flow from the WLPMA to the ELPMA, despite measured groundwater elevations in the ELPMA being several hundred feet higher than those in the WLPMA. Because these flows are an artifact of the updated model construction and are inconsistent with the hydrogeologic conceptual model, they were not integrated into the modeling conducted for the ELPMA.

In addition to impacting the groundwater budget, the change in the model boundary condition with the ELPMA also impacts simulated groundwater elevations in the eastern portion of the WLPMA. Because groundwater is allowed to flow out of the WLPMA along this boundary, simulated groundwater elevations do not rise as rapidly in response to reduced groundwater production as they would if the model boundary condition had not been changed from a no-flow boundary to a general head boundary. The impact of this change on groundwater elevations was observed in the difference between the simulated response to groundwater projects in the GSP and the First Periodic Evaluation (Figure 2-1). In the GSP, simulated groundwater elevations at well 02N20W06R01 rose approximately 103 feet in response to implementation of an in-lieu groundwater delivery project. This rise is similar to that

measured in the historical data between 1994 and 2006, when CMWD was delivering imported water in-lieu of local groundwater pumping to WLPMA. In contrast, when the same project was modeled in the First Periodic Evaluation with the general head boundary condition, the simulated groundwater elevation recovery was approximately 46 feet.

The comparison of the observed historical change in groundwater elevation to the modeled change in groundwater elevation indicates that UWCD's change to the model boundary condition between WLPMA and ELPMA has introduced additional uncertainty into the predictive capabilities of the model in this region. Future work should be conducted to reduce this uncertainty by modifying and recalibrating the revised model using a no-flow boundary condition to represent the hydrogeologic conceptual model of this area.

The changes to the UWCD model and their potential impact on simulated groundwater elevations were discussed with the LPV TAC before the model was used for this BOY Study. Watermaster and TAC agreed that, while the change in the model boundary condition is not consistent with the hydrogeologic conceptual model, groundwater management decisions will be based on observed water levels, rather than model simulations. The UWCD model is capable of simulating groundwater elevations in the eastern portion of the WLPMA that rise above the minimum threshold prior to 2040 and remain above the minimum threshold from 2040 to 2070. Thus, the use of the UWCD model files developed for the First Periodic Evaluation remains the best available option to evaluate the Basin Optimization Yield and complete this first BOY study prior to the beginning of the 2027 water year (October 1, 2026 – September 30, 2027) (FCGMA 2025b).

3 BOY Scenario Modeling

3.1 BOY Scenario Assumptions

This section describes the common set of assumptions used to model groundwater conditions with both the Coastal Plain Model and the ELP Model, as well as the common set of assumptions used to determine which model scenarios are considered sustainable.

3.1.1 Simulation Time Period

The future scenarios developed for the BOY Study simulate groundwater conditions in the Basin over the 47-year period from October 1, 2022, through September 30, 2069 (i.e., DWR water years 2023 through 2069). This is the same period simulated for the First Periodic Evaluation.

3.1.2 Hydrology

To simulate future groundwater conditions, the numerical models must incorporate assumptions about the potential future hydrology of the Basin. Multiple methods can be used to generate a synthetic future hydrology. During development of the GSP, the preferred method for generating the synthetic future hydrology was to extract measured historical data from a representative period and adjust those data based on the future predicted climate. The period from 1933 to 1979 was determined to be representative of overall historical conditions and included periods of above average precipitation as well as periods of drought. To convert the historical record into a synthetic future hydrology, the data were multiplied by DWR's 2070 central tendency climate change factors, as described

in the GSP and the First Periodic Evaluation (FCGMA 2019 and FCGMA 2024). These adjusted data were then used to represent the future hydrology in the model runs for this BOY Study. This is the same future hydrology that was used in the First Periodic Evaluation.

Of course, the exact future hydrology is unknown. Therefore, the synthetic future hydrology is a source of uncertainty in any future model simulations. DWR water years 2023 and 2024 were wet years with wetter than average precipitation (FCGMA 2025c). This meant that the first two years of the simulations (DWR water years 2023 and 2024) differed from the measured groundwater elevations at the wells in the Basin. Therefore, the simulated groundwater elevations were shifted to the most recent available groundwater measurement (in DWR water year 2024) on the simulated future groundwater elevation hydrographs.

3.1.3 Water Supply and Future Projects

Projected future water supplies from existing sources are identified in Table 3-1. These include imported water delivered to purveyors in the Basin by CMWD; recycled water deliveries and discharges to percolation ponds in the ELPMA by Ventura County Waterworks District No. 1 (VCWWD-1); and discharges to the Arroyo Simi-Las Posas from dewatering wells in Simi Valley and the SVWQCP. Water supplies from existing sources remained constant in all of the model scenarios.

It should be noted that CMWD maintains stored groundwater in the Basin for emergency purposes. CMWD stored imported water as part of its historical in-lieu project in both the ELPMA and WLPMA and injects imported water at its Aquifer Storage and Recovery (ASR) project in the ELPMA. As of the end of DWR water year 2022, CMWD had approximately 28,168 AF stored in the ELPMA and 25,192 AF in the WLPMA (FCGMA 2024). Injection or recovery of this water can affect groundwater elevations in the Basin. However, CMWD has represented that the water it has stored in the Basin is principally for an emergency when it loses access to imported water from the Metropolitan Water District of Southern California (MWD), which might occur during a State-wide emergency. It is beyond the scope of this BOY Study to include planning for such State-wide emergencies. Additionally, CMWD has represented that it would replenish stored water at the earliest opportunity when used for other purposes. Therefore, the model scenarios assume that CMWD stored water will remain in storage. Significant pumping without timely replenishment of this stored water may cause groundwater levels to be lower than simulated and impact ability to maintain groundwater elevations above minimum thresholds to avoid Undesirable Results.

Table 3-1. Projected Future Water Supplies from Existing Sources in the LPVB

Source of Future Water Supply	Description	Projected Future Water Supply (acre-feet)
Imported Water	CMWD imported water deliveries to purveyors	8,900
	Groundwater pumped from the ASRVB and used in the LPVB	0
	Groundwater pumped from the PVB and used in the LPVB	0
Non-potable and Recycled Water	CWD deliveries	370
	VCWWD-1 discharges to percolation ponds in the ELPMA	360
	VCWWD-1 deliveries to agricultural and M&I operators	2,000[a]
	SVWQCP discharges to Arroyo Simi-Las Posas	8,040[b]
	Simi Valley dewatering well discharges to Arroyo Simi-Las Posas	1,318[b]
	Total projected water supply from existing sources	20,988

Notes: ASRVB = Arroyo Santa Rosa Valley Basin; CMWD = Calleguas Municipal Water District; CWD = Camrosa Water District; PVB = Pleasant Valley Basin; SVWQCP = Simi Valley Water Quality Control Plant; VCWWD-1 = Ventura County Waterworks District No. 1.
[a] Estimated based on VCWWD-1 projections in its 2020 UWMP and actual deliveries within the LPVB in water year 2020.
[b] 2016 – 2022 averages.

Two Basin Optimization Projects were incorporated into the future model scenarios based on the findings of the Basin Optimization Plan (FCGMA 2025a). These projects are the Purchase of Imported Water from CMWD for Basin Replenishment project, and the Arroyo Simi-Las Posas Water Acquisition project.

As discussed in the Basin Optimization Plan, the Purchase of Imported Water from CMWD for Basin Replenishment project would supply imported water in lieu of groundwater extraction in areas of the WLPMA and ELPMA exhibiting chronic groundwater level declines. Historical data suggest that rapid recoveries in groundwater elevation can be achieved with in-lieu deliveries to the WLPMA (FCGMA 2019). In the ELPMA, historical groundwater recoveries were not observed during implementation of the in-lieu program, but reduction in the rate of decline and stabilization of water levels were observed.

The total estimated imported water assumed to be available for the project was based on the historical deliveries of imported water under the previous in-lieu programs as well as estimates provided by CMWD, Zone Mutual Water Company (MWC), and Ventura County Waterworks District No. 19 (VCWWD-19) during development of the Basin Optimization Plan (FCGMA 2025a). In WLPMA, the in-lieu project would deliver 1,760 AFY of imported water to offset pumping in wells operated by Zone MWC and VCWWD-19 (Table 3-2; Figure 3-1). In the ELPMA, the in-lieu project would deliver 1,380 AFY of imported water to offset pumping in wells operated by VCWWD-1 (Figure 3-1). This project relies on existing infrastructure. Therefore, it can be implemented after a program policy by the Watermaster Board is developed, including determination of the pumping costs and amount of incentive, allocation of funds, and incentivization agreements to purchase water from CMWD (FCGMA 2025a).

Table 3-2. Projected Future Water Supplies from New Projects in the LPVB

Project Name	Description	Source of Future Water Supply	Projected Future Water Supply from New Projects (acre-feet)	Time Period for Implementation
Purchase of Imported Water from CMWD for Basin Replenishment	In lieu delivery of imported water to WLPMA and ELPMA to reduce groundwater production in key areas prone to declining groundwater levels and loss of groundwater storage	Imported water	1,760 AFY - WLPMA 1,380 AFY – ELPMA *3,140 AFY - Total*	Water year 2027 - if agencies choose to participate and the program policy is finalized by the Watermaster Board[1]
Arroyo Simi-Las Posas Water Acquisition	Purchase/lease of 4,200 AFY of upstream discharges to Arroyo Simi-Las Posas to maintain future surface water flows into ELPMA	SVWQCP Discharges to Arroyo Simi-Las Posas	0 AFY increase relative to current state. This project maintains existing flows	Water year 2027 - Following final negotiations with the City of Simi Valley
Total projected additional water supplies from new projects			3,140	

Note: Projects modeled from start of simulation time period of DWR water year 2023.

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 (SVWQCP) to the Arroyo Simi for downstream recharge to the Basin (FCGMA 2025a). Without the purchase or long-term lease, the City of Simi Valley could decide to use this water for use within the Simi Valley Basin or elsewhere where it would not flow downstream to the LPVB. The City of Simi Valley has indicated that 4,700 AFY of water would be available (FCGMA 2019). However, due to the riparian use of the water along the Arroyo Simi–Las Posas and flow downstream to the PVB, these flows result in an estimated 1,200 AFY of sustainable yield to the ELPMA (FCGMA 2021). As noted in the Basin Optimization Plan, this project seeks to maintain existing water supplies in the Basin rather than provide new or additional water supply. The project could be implemented immediately following final negotiations between FCGMA and Simi Valley, however, the time required to develop this agreement is not well defined. Under the Basin Optimization Plan, the time required to generate the final agreements was estimated to be approximately 18 months (FCMGA 2025).

Because neither project requires construction of additional infrastructure and the implementation timing for each project primarily relies on the timing of coordination agreements, both projects were implemented at the start of the model scenarios rather than assuming a delayed start date, consistent with the Basin Optimization Project schedule in the Basin Optimization Plan (FCGMA 2025a). This approach is consistent with the current state of the surface water flows in Arroyo Simi-Las Posas, which, to date, have continued to flow into the LPV Basin without a formal agreement. However, the in-lieu project deliveries are not currently occurring. If implementation of the in-lieu project is delayed for multiple years, the modeled impacts of the project on groundwater levels in this BOY Study may overestimate the impact of this project. Thus, the simulated groundwater levels should be considered an indicator of the long-term potential project impact, rather than the specific anticipated groundwater level for any given year. The actual timing of the project start date is a source of uncertainty in the future model results.

3.1.4 Sustainability Evaluation Metrics

This section provides a description of the criteria used to evaluate whether the simulated future groundwater production rates in the model scenarios developed for this BOY Study are sustainable. Because of the unique hydrogeologic characteristics of each management area, the criteria for evaluating sustainability are discussed, by management area, in the subsections below.

ELPMA and Epworth Gravels Management Area

In the ELPMA and Epworth Gravels Management Area, groundwater production rates were determined to be sustainable if the simulated groundwater elevations at the Key Wells remained above the MTs established in the GSP. These MTs were selected to protect against chronic declines in groundwater elevation in both the ELPMA and Epworth Gravels Management Area. In the ELPMA, the MTs were also selected to prevent significant and unreasonable loss of groundwater storage and conversion from confined to unconfined conditions in the Fox Canyon aquifer. Note that the MT for the Epworth Gravels Management Area applies specifically to the Epworth Gravels aquifer, not to the underlying aquifers (including Fox Canyon and Grimes Canyon aquifers), which are part of the ELPMA.

WLPMA

In the WLPMA, groundwater production rates were considered to be sustainable if the simulated groundwater elevations at the Key Wells remained above the MTs established in the GSP. These MTs were selected to protect against chronic declines in groundwater elevation and loss of groundwater in storage (FCGMA 2019).

Additionally, in the WLPMA, the long-term groundwater production rate was determined to be potentially sustainable for this BOY Study if groundwater elevations remained stable over the future model period, such that the ending groundwater level was equal to or higher than the starting groundwater elevation. This definition was adopted for this BOY Study because in the eastern portion of the WLPMA, groundwater elevations have declined significantly in recent years, such that they are now below the MTs established in the GSP. Historically, in-lieu imported water deliveries have resulted in groundwater elevation recoveries that exceeded 100 feet in this area of the WLPMA (Section 2.2; Figure 2-1); thus, it is likely that groundwater elevations will respond similarly to implementation of a similar in-lieu project in the future. However, the updated Coastal Plain Model did not reproduce the same magnitude of groundwater elevation response as was observed historically (Figure 2-1). Therefore, project implementation and adjustment of in-lieu delivery rates informed by groundwater elevation monitoring are expected to bring groundwater elevations back above the MT. Once the groundwater elevations are higher than the MT, a long-term production rate can be determined that results in stable groundwater elevations that remain above the MT which is sufficient to avoid Undesirable Results.

Because the WLPMA is hydrogeologically connected to the adjacent Oxnard Subbasin, which is experiencing seawater intrusion, the volume of groundwater that flows across the boundary between the Oxnard Subbasin and WLPMA can impact the ability of the Oxnard Subbasin to prevent future seawater intrusion. The First Periodic Evaluation found that the effects were more pronounced in the Lower Aquifer System (LAS) than in the shallower aquifers (Upper Aquifer System [UAS] in the Oxnard Subbasin, shallow aquifer system in the WLPMA). Based on findings in the First Periodic Evaluation that, under the pumping distribution in the No New Projects 3 or NNP3 scenario, up to 800 AFY of groundwater can flow from the Oxnard Subbasin to the WLPMA in the LAS without causing undesirable effects in either basin (See Table 5-2 in FCGMA 2024). For all other scenarios that avoided Undesirable Results, the flux across the

WLPMA boundary with the Oxnard Subbasin in the LAS was less than 800 AFY or, in some cases, changed direction with flow from WLPMA contributing to the Oxnard Subbasin. Based on these results, a simulated groundwater flux of 800 AFY or less across the boundary from the Oxnard Subbasin to the WLPMA in the LAS was considered sustainable for the purposes of this BOY Study. It should be noted that the flux is much higher in the UAS from the Oxnard Subbasin to the shallow aquifer system in the WLPMA.

3.1.5 Uncertainty

Numerical groundwater flow models are the best tools to evaluate future groundwater conditions, especially in hydrogeologically complex groundwater basins such as the LPVB. The models have inherent quantifiable uncertainty, as discussed in Section 2, and unquantified uncertainty associated with scenario assumptions, as discussed in Sections 3.1 and 3.2. Following is a summary of the uncertainties associated with the modeling of future groundwater conditions for this BOY Study. These uncertainties should be kept in mind when evaluating the model simulation results.

- **ELP Model**
  - The GSP uncertainty bounds for sustainable yield estimated using the ELP Model of ±2,300 AFY covering the ELPMA and the Epworth Gravels Management Area (Section 2.1; FCGMA 2019).
  - Distribution of pumping from the Epworth Gravels aquifer (Epworth Gravels Management Area) and the underlying Fox Canyon and Grimes Canyon aquifers within the ELPMA (Section 3.2.2).
- **Coastal Plain Model**
  - The GSP uncertainty bounds for sustainable yield estimated using the GSP version of the VRGWFM of ±1,200 AFY (FCGMA 2019). While the uncertainty of the updated Coastal Plain Model used in the First Periodic Evaluation and this BOY Study has not been re-evaluated, the intrinsic model uncertainty from the GSP version should be kept in mind when evaluating the results of scenario simulations conducted for this BOY Study (Section 2.2).
  - The boundary condition adjacent to the Somis Fault in the change in boundary condition in the updated Coastal Plain Model (Section 2.2).
- **Both Models**
  - Synthetic future hydrology (precipitation) through the simulation time period (Section 3.1.2).
  - Future water supply (Section 3.1.3).
  - Project start timing (for Projects Scenario; Section 3.1.3).
  - Distribution of future groundwater pumping, including uncertainty in use of transfers and Carryover (Section 3.2.2).

3.2 BOY Baseline Scenario

The baseline groundwater production scenario for the BOY Study assesses whether groundwater production can be maintained sustainably at the initial Operating Yield of 40,000 AFY, based on the allocation assigned to each Water Management Identification Number (WMID) in the Judgment, without implementing projects.

3.2.1 Judgment Allocations to WMIDs

The Judgment grants four types of allocations – Agricultural, Commercial, Domestic, and Mutual Water Company Allocations. Allocations were assigned to WMIDs for an individual Water Right Holder or a group of Water Right Holders. All agricultural landowners that participated in the Judgment received a groundwater allocation, although some of those allocations were less than 0.1 AFY. Additionally, some agricultural properties that historically reported extractions did not receive an allocation.

The total allocation assigned in Exhibit C of the Judgment equaled 41,851.58 AFY. This total exceeded the initial Operating Yield of 40,000 AFY and the Watermaster adjusted Annual Allocations to equal 40,000 AFY in accordance with the Judgment (Judgment § 4.2). Because the 2025 BOY Study is intended to assess the ability of projects to maintain the BOY at as close to 40,000 AFY as possible, and to evaluate the need for a Rampdown relative to the initial Operating Yield, this BOY Study used the Water Year 2024 Annual Allocations published by the Watermaster as the basis for extractions in the numerical groundwater models.

3.2.2 Baseline Scenario Extraction Rates

3.2.2.1 Baseline Pumping Distribution Methodology

While the Judgment assigns allocations based on WMIDs, groundwater production in the Basin occurs at individual wells. Therefore, the allocation assigned to each WMID had to be distributed to the groundwater production well or wells associated with that WMID. For the purpose of distributing the allocations assigned to each WMID, Water Right Holders were divided into three general groups:

- Water Right Holders who pump all their assigned groundwater allocation from wells associated with their WMID and not by a MWC,
- MWC exclusive users – who receive their entire allocation from mutual water companies and do not pump any groundwater from wells associated with their WMID,
- MWC hybrid users – who receive some of their allocation from MWCs and pump the remaining allocation from well(s) associated with their WMID.

For Water Right Holders who pump their groundwater allocation from a single well associated with their WMID, the distribution is straightforward. All of the Annual Allocation for these Water Right Holders was assigned to the single well associated with their WMID. For MWC exclusive users, all of their Annual Allocation was assumed to be pumped by the MWC and delivered to the Water Right Holder. Therefore, these users did not have wells in the Basin associated with their WMID. For all other Water Right Holders, those with multiple wells and those that receive some portion of their allocation from a MWC, several methods for determining the volume of Annual Allocation that was distributed to each well were considered.

Of the methods considered, the selected approach, with which the TAC concurred, was to distribute the Annual Allocation based on the reported pumping and MWC deliveries for DWR water year 2024[3], the first full water year after the Judgment was adopted. Groundwater production patterns after the Judgment was adopted may better represent future groundwater pumping under Exhibit C than the historical groundwater production distribution used

[3] Note – The distribution was based on reported pumping in the Water Year 2024 annual report, which only accounted for approximately 75% of the anticipated total pumping for the water year (FCGMA 2025c).

in the GSP and the First Periodic Evaluation. However, shifts in pumping distribution in the future are also likely, as groundwater allocation trading occurs and Water Right Holders better understand how to manage their use under the new allocation scheme. Further, the Judgment allows Water Right Holders to Carryover up to 150 percent of their unused Allocation Basis. Carryover can be used or transferred within the next five water years. These potential shifts in where groundwater is pumped create significant uncertainty in the modeled future groundwater conditions. Therefore, while the pumping distribution in the BOY model scenarios represents the distribution based on the best available data, these data will change in the future and should be updated for the next BOY Study.

The method for distributing pumping for each user type is presented in Figure 3-2. For Water Right Holders that pump their allocation from multiple wells, the proportion of the allocation that was assigned to each well was based on the proportion of the total reported pumping for water year 2024 that well represented. For example, if in water year 2024, a Water Right Holder with two wells pumped 10% of their total water used from one well and 90% from their second well, 10% of the Annual Allocation for that Water Right Holder, whether it was larger or smaller than what was pumped in 2024, was distributed to the first well and 90% was distributed to the second well. Similarly, for water users that received a portion of their allocation from an MWC, the proportion of the allocation received equaled that reported as received in water year 2024. If a Water Right Holder received 50% of the water they used in water year 2024 from an MWC and pumped 50% from a well or wells associated with their WMID, then 50% of their Annual Allocation was assigned to the MWC and the remaining 50% was distributed to the well, or wells, associated with the WMID based on the percentage pumped in water year 2024. The Baseline Scenario allocation for each well is provided in Appendix A and shown in Figure 3-3.

3.2.2.2 Baseline Scenario Pumping Distribution by Management Area

After the allocations for each WMID were distributed to individual wells (Figure 3-3), the total groundwater production was calculated for each management area (Table 3-3). The Baseline Scenario production exceeds the First Periodic Evaluation estimates of sustainable yield by approximately 7,000 AFY in the WLPMA and by approximately 2,700 AFY in the ELPMA (Table 3-3). Note that the groundwater production and estimated sustainable yield for the Epworth Gravels Management Area applies specifically to pumping from the Epworth Gravels aquifer. Production within the aerial limits of the Epworth Gravels Management Area from the deeper aquifers is from the ELPMA.

Table 3-3. Comparison of Baseline Groundwater Production by Management Area

Management Area	Groundwater Production Rate (AFY)		
	BOY Study Baseline Scenario	Estimated Sustainable Yield[1]	
WLPMA	18,417	11,400	(±2,300)[2]
ELPMA	20,559	17,900	(±1,200)[3]
Epworth Gravels Aquifer / Mgt. Area	1,024	1,330	–
Total	**40,000**	**30,630**	**(±3,500)**

Note:

1 Values are from Tables 5-2 and 5-3 of the First Periodic Evaluation (FCGMA 2024).

2 Estimated uncertainty was quantified for the WLPMA portion of the VRGWFM used for the GSP (FCGMA 2019). Uncertainty for the updated model used for the First Periodic Evaluation and this BOY Study has not been re-evaluated.

3 Estimated uncertainty was quantified for the ELP Model used for the GSP (FCGMA 2019), the same model used for the First Periodic Evaluation and this BOY Study. The Epworth Gravels Management Area uncertainty is included in the ELPMA uncertainty.

It should be noted that not all operators who have historically pumped in the Basin received a Water Right Allocation. Unauthorized extraction of groundwater by some, or all, of these operators continues, which is not included in the Baseline Scenario groundwater production. In water year 2024, operators without an Allocation reported 259 AF of production in the WLPMA, 1,288 AF in the ELPMA, and 63 AF in the Epworth Gravels Management Area. There may be additional unauthorized pumping in the Basin by operators that did not receive an Allocation and have not reported their pumping to the Watermaster.

The differences between the Baseline Scenario production rate and the average groundwater production from water years 2016 to 2024 are shown in Figure 3-4, which shows increases and decreases at wells. The wells with the largest increases in groundwater production under the Baseline Scenario are located in the eastern WLPMA, and the northern ELPMA. These areas have been prone to declining groundwater elevations in the past and, as a result, specific groundwater elevation thresholds were developed in the GSP to avoid Undesirable Results from chronic declines in groundwater elevation (FCMGA 2019). Additional groundwater production from these areas beyond the historical average groundwater production would be anticipated to exacerbate groundwater declines, and likely cause groundwater elevations to fall below the minimum thresholds established in the GSP.

It should be noted, however, that the future pattern of groundwater production is unlikely to match the exact distribution of groundwater production shown in Figure 3-3 for two primary reasons. First, the distribution is based on a single year of reported groundwater production since the Judgment became effective. This approach was adopted, with concurrence by TAC, because the groundwater allocation in the Judgment did not match the historical pattern of groundwater production in the Basin (Figure 3-4). However, historically, the relative distribution of groundwater use between wells has changed from year to year as Water Right Holders actively manage which wells they use and how much they pump from those wells. Because the allocation is assigned to the Water Right Holders, and not to the well, we anticipate that, with additional years of reported groundwater extractions under the Judgment, the distribution of groundwater pumping calculated for this initial BOY Study is likely to change. Second, allocation transfers are allowed under the Judgment. As Water Right Holders transfer allocation between WMIDs, the distribution of groundwater production will also change. Consequently, while relying on the single year of groundwater production under the Judgment is appropriate for this initial BOY Study, the distribution of groundwater production may look quite different in five years. Thus, the physical distribution of groundwater production in the Baseline Scenario represents a source of uncertainty in the future model results. This uncertainty should be reduced for each successive BOY Study, as Basin operation conditions become established under the Judgment.

3.2.3 Baseline Scenario Model Results

3.2.3.1 Baseline Scenario Groundwater Elevations

Epworth Gravels

In the Epworth Gravels Management Area (Epworth Gravels aquifer), Baseline Scenario simulated groundwater elevations rose throughout the 47-year model time period (Figure 3-5). The model results are consistent with the finding in the GSP that the simulated groundwater elevations in the Epworth Gravels Management Area are sensitive to small changes in the groundwater production rate. However, the modeled groundwater elevations are not anticipated to reflect actual conditions in the Epworth Gravels Management Area over time for two primary reasons. First, not all groundwater producers with wells in the Epworth Gravels Management Area received an allocation in the Judgment (Figure 3-4). Second, Water Right Holders within the Epworth Gravels Management Area (Epworth Gravels aquifer) typically have multiple wells, some of which are screened in the underlying Fox Canyon

and/or Grimes Canyon aquifers. If, during water year 2024, these Water Right Holders pumped less than average from the Epworth Gravels Management Area wells, the baseline pumping distribution in the BOY Study Baseline Scenario would extrapolate this single year of reduced pumping over the entire 47-year model time period. The result is continuously rising simulated groundwater elevations that do not reflect the historical production patterns from the aquifer.

The baseline groundwater production rate in the Epworth Gravels Management Area for this BOY Study is 1,024 AFY, which is approximately 446 AFY lower than the average 2016 to 2022 baseline extractions modeled in the First Periodic Evaluation (FCGMA 2024). At the First Periodic Evaluation future baseline groundwater production rate of 1,470 AFY, simulated groundwater elevations in the Epworth Gravels Management Area decline over the entire model period (Figure 3-5). The sustainable groundwater production rate for the Epworth Gravels Management Area is estimated to be approximately 1,320 AFY (FCGMA 2019, FCGMA 2024).

Historically, groundwater production in the Epworth Gravels Management Area has depleted groundwater in storage, causing groundwater users to drill deeper wells that produce water from the underlying Fox Canyon aquifer (FCGMA 2019). When wells were rested in the Epworth Gravels Management Area (from the Epworth Gravels aquifer), 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.

ELPMA

Groundwater production at the Baseline Scenario rates was determined not to be sustainable in the ELPMA because simulated groundwater elevations at five Key Wells fell below the minimum threshold groundwater during the 47-year model run (Figure 3-6). These wells, which are screened in the Fox Canyon aquifer, are located in the northern ELPMA, where the influence of recharge from Arroyo Simi-Las Posas is less pronounced. Baseline Scenario production rates in the northern ELPMA were, on average, higher than the 2016 to 2024 average production rates (Figure 3-4). The simulated groundwater elevation declines in the northern ELPMA are consistent with previous model scenarios evaluated in the GSP and the First Periodic Evaluation (FCGMA 2019, FCGMA 2024).

WLPMA

Groundwater production at the Baseline Scenario rates was determined not to be sustainable in the WLPMA because simulated groundwater elevations at three Key Wells were below the minimum thresholds during a portion of, or the entirety of, the 47-year model time period (Figure 3-6). Two of the three wells, which are screened in the Lower Aquifer System, are located in the eastern WLPMA, adjacent to the Somis Fault. Groundwater recharge in this area of the WLPMA is limited. Baseline Scenario production rates in the WLPMA were, on average, higher than the 2016 to 2024 average production rates, and these rates were determined not to be sustainable in the First Periodic Evaluation of the GSP (Figure 3-4; FCGMA 2024). Therefore, the determination that the Baseline Scenario production rates in this study are not sustainable is consistent with the findings of the GSP and the First Periodic Evaluation (FCGMA 2019, FCGMA 2024).

3.2.3.2 Baseline Scenario Water Budget

The two models covering the Basin were used to calculate the water budgets for the WLPMA, ELPMA, and Epworth Gravels Management Area. Because the ELP Model includes both the ELPMA and Epworth Gravels Management

Area, a single water budget for both management areas is discussed below. The water budget for the WLPMA is discussed separately.

ELPMA and Epworth Gravels

The primary inflows in the ELPMA are stream leakage, recharge from precipitation, M&I and agricultural return flows, and mountain front recharge (Figure 3-7). The Epworth Gravels Management Area does not receive stream leakage or mountain front recharge. Recharge to this aquifer is limited to precipitation and return flows. The primary outflow in both the ELPMA and Epworth Gravel Management Area is groundwater production. In addition, in the ELPMA, there is outflow from evapotranspiration along Arroyo Simi-Las Posas, underflows to the Pleasant Valley Basin, and minor underflows to the WLPMA (Figure 3-7).

In the Baseline Scenario, groundwater outflows exceed groundwater inflows by approximately 1,500 AFY.

WLPMA

The WLPMA is divided vertically into a shallow aquifer system and the Lower Aquifer System (LAS). Approximately 90% of the total groundwater extraction from the WLPMA occurs in the LAS, while approximately 65% of the recharge to the LAS comes from the shallow aquifer system. The primary inflows to the shallow aquifer system are recharge from precipitation, M&I and agricultural return flows, subsurface flows from the Oxnard Subbasin, and, to a much smaller extent, subsurface inflow from the Pleasant Valley Basin (Figure 3-8). Vertical flows to the LAS and groundwater pumping are the primary outflows in the shallow aquifer system (Figure 3-8).

The primary inflows to the Lower Aquifer System of the WLPMA are vertical flows from the shallow aquifer system, recharge from precipitation, M&I and agricultural return flows, recharge from the outcrop area, and minor flows in from the Pleasant Valley Basin and Oxnard Subbasin (Figure 3-9). Groundwater production is the primary outflow from the LAS (Figure 3-9). Additionally, there is a component of the water budget that represents flows across the model boundary between the WLPMA and ELPMA. In the Baseline Scenario, the model simulated approximately 500 AFY of inflow to the WLPMA across this boundary (Figure 3-9). This component of flow is shown in the water budget for completeness but, as discussed in section 2.1, it is considered an artifact of the model construction and not representative of physical hydrogeological conditions in the management area.

In the Baseline Scenario, groundwater outflows from the WLPMA exceeded groundwater inflows by approximately 400 AFY (Figures 3-8 and 3-9).

3.3 Projects Scenario

Because the Baseline Scenario is unsustainable, a Projects Scenario was developed to simulate the Purchase of Imported Water from CMWD for Basin Replenishment project selected in the Basin Optimization Plan (FCGMA 2025a). This project consists of deliveries of CMWD imported water to VCWWD-1 in the northern ELPMA and VCWWD-19 and Zone MWC in the eastern WLPMA in lieu of local groundwater pumping. These areas were targeted because they were the areas in which Baseline Scenario groundwater elevations were below the minimum thresholds. Historical in-lieu imported-water delivery projects were successful in reversing, or slowing, groundwater elevation declines in these areas (FCGMA 2019). Participation of VCWWD-1, VCWWD-2, and Zone MWC would be under the policy and terms to be established by Watermaster and agreements with these purveyors.

3.3.1 Projects Scenario Extraction Rates

As discussed in Section 3.1.3, the Projects Scenario incorporated 1,760 AFY of surface water deliveries to offset groundwater production from six wells in the eastern WLPMA, and 1,380 AFY of surface water deliveries to offset production from three wells in the ELPMA. Project wells are shown on Figure 3-1. The resulting groundwater production rates were 16,657 AFY in the WLPMA and 19,179 AFY in the ELPMA (Table 3-3). The groundwater production rate in the Epworth Gravels Management Area remained the same as in the Baseline Scenario. The total production in the Projects Scenario from all three management areas was 36,860 AFY (40,000 AFY less 3,240 AFY in-lieu reduction), which represents an approximately 8% reduction in the groundwater production relative to the Baseline Scenario.

Table 3-4. BOY Future Groundwater Production Scenario Extraction Rates

Management Area	Groundwater Production Rate (AFY)			
	Baseline Scenario	Projects Scenario	Basin-wide Rampdown Scenario	Differential Rampdown Scenario
			20% Reduction WLPMA, ELPMA, and Epworth Gravels	20% Reduction WLPMA/ 11% Reduction ELPMA and Epworth Gravels
WLPMA	18,417	16,657	14,734	14,734
ELPMA	20,559	19,179	16,447	18,298
Epworth Gravels	1,024	1,024	819	911
Total	**40,000**	**36,860**	**32,000**	**33,943**

3.3.2 Projects Scenario Results

3.3.2.1 Project Scenario Groundwater Elevations

Epworth Gravels

The simulated groundwater production rate in the Projects Scenario was the same as that simulated in the Baseline Scenario because no pumpers within the Epworth Gravels Management Area (Epworth Gravels aquifer) received in-lieu surface water deliveries as part of the projects in the Basin Optimization Plan and therefore in this BOY Study. Therefore, the groundwater elevations simulated in the Epworth Gravels Management Area for the Projects Scenario were the same as those discussed in Section 3.2.3.1 and shown in Figure 3-5.

ELPMA

The groundwater production rate in the Projects Scenario is likely to be sustainable in the ELPMA because simulated groundwater elevations remained above the minimum threshold at all the Key Wells in the management area (Appendix B). This includes the five Key Wells that had groundwater elevations fall below the minimum threshold in the Baseline scenario (Figure 3-10). These wells are in the area of the ELPMA that was targeted by the in-lieu surface water delivery program. Although the decline in simulated groundwater elevations in these wells did not fully stabilize in this scenario, the results suggest that implementation of the project as envisioned in the Basin Optimization Plan may be sufficient to avoid Undesirable Results in the ELPMA. Ongoing groundwater monitoring will confirm whether future groundwater elevations stabilize above the minimum thresholds.

WLPMA

In the WLPMA, groundwater production at the Projects Scenario rates is likely to be sustainable because simulated groundwater elevations remained above the minimum thresholds at two of three Key Wells in which groundwater elevations were previously below the minimum threshold (Figure 3-10). Although the simulated groundwater elevation at the third well, 02N20W06R01, remained below the minimum threshold during the Projects Scenario, the groundwater elevation at the end of the scenario was similar to the elevation at the start of the scenario.

After reviewing the initial results of the Projects Scenario, TAC suggested that additional Projects Scenarios be investigated for the WLPMA, to see if redistributing groundwater production among the project wells could help raise the simulated groundwater elevations at well 02N20W06R01. The overall groundwater production rate in the WLPMA remained the same in these redistributed Projects Scenarios, but the volume of groundwater produced from well 02N20W06R01 was reduced and assigned to the other project wells. The resulting groundwater elevations at well 02N20W06R01 were not significantly affected by redistributing the project pumping to the other project wells (Figure 3-11).

As discussed in Section 2.1, simulated groundwater elevations in well 02N20W06R01 are influenced by the change in the model boundary condition that dampens the groundwater level response to projects relative to the observed historical groundwater elevation response (Figure 2-1). For this reason, and because future simulated groundwater elevations at this well are generally stable in the Projects Scenario, the Projects Scenario may be sufficient to avoid Undesirable Results in the WLPMA. Ongoing groundwater monitoring will confirm whether future groundwater elevations stabilize above the minimum thresholds.

Because the project was successfully implemented in the WLPMA in the past, implementation does not require construction of new infrastructure, and the volume of in-lieu water can be actively managed based on measured groundwater elevations, additional attempts to simulate redistributed groundwater production were not pursued. Measured groundwater elevations will provide a better assessment of the effectiveness of the project, and in-lieu imported water deliveries can be increased or decreased annually in order to ensure that sufficient deliveries are provided to maintain groundwater elevations above the minimum thresholds.

3.3.2.2 Projects Scenario Water Budget

ELPMA and Epworth Gravels

The total inflow to the ELPMA and Epworth Gravels Management Areas in the Projects Scenario was similar to that in the Baseline Scenario (Figure 3-7). Groundwater production decreased in the Projects Scenario by 1,380 AFY, which is the volume of delivered CMWD in-lieu water. In the Projects Scenario, groundwater outflows exceed groundwater inflows by approximately 600 AFY.

WLPMA

The total inflow to, and outflow from, the shallow aquifer system of the WLPMA in the Projects Scenario was similar to that in the Baseline Scenario (Figure 3-8). The primary change between the two scenarios was an approximately 700 AFY decrease in the flow leaving the shallow aquifer system and replenishing the LAS because lower groundwater production in the LAS maintained higher groundwater elevations and induced less recharge from the shallow aquifer system. Additionally, in the LAS groundwater production was reduced by 1,760 AFY to simulate implementation of the in-lieu surface water delivery project to Zone MWC and VCWWD-19. As a result of higher groundwater elevations in the eastern WLPMA during the Projects Scenario, the model simulated flow leaving the model domain and flowing toward the ELPMA (Figure 3-9). This flow is an artifact of the model construction. In the Projects Scenario, groundwater outflows equaled groundwater inflows in the WLPMA.

The water budgets for the Redistributed Projects 1 and 2 scenarios are also shown in Figures 3-8 and 3-9. These water budgets are the same as the water budget for the Project Scenario, as the only change between the scenarios was the distribution of groundwater pumping at the project wells. The total groundwater production and the distribution of groundwater production at the non-project wells remained the same.

3.4 Rampdown Scenarios

In order to provide both the Watermaster Board and Water Right Holders with an understanding of the reduction in groundwater production that would be necessary to reach sustainable conditions if the projects are not implemented, two Rampdown Scenarios were developed at the recommendation TAC. Consistent with the Judgment, the first Rampdown Scenario applies a Basin-wide reduction factor to groundwater production in all three management areas. This scenario is discussed in Section 3.4.1. The second Rampdown Scenario applies two different reduction factors, one for the WLPMA and the other for the ELPMA and Epworth Gravels Management Area. This Rampdown Scenario is called the Differential Rampdown Scenario and is discussed further in Section 3.4.2. The Judgment provides that a Differential Rampdown could be implemented that would result in "*localized restrictions on extractions*" (Judgment § 4.10.3). This process includes, but is not limited to, committee consultation and a list of specific findings relative to the implementation of projects and the avoidance of Undesirable Results (Judgment § 4.10.3.1).

3.4.1 Basin-wide Rampdown Scenario

3.4.1.1 Basin-wide Rampdown Scenario Extraction Rates

The goal of the Basin-wide Rampdown scenario was to determine the groundwater production rate at which Undesirable Results are avoided in all management areas if projects are not implemented. Previous model analyses conducted for the First Periodic Evaluation were used to develop an initial estimate of the reduction factor, relative to the initial Operating Yield of 40,000 AFY, that would maintain groundwater elevations above the minimum threshold at all Key Wells in the Basin. The initial estimate was then tested using the Coastal Plain and ELP Models. Simulated groundwater elevations from this initial estimate were used to refine the reduction rate and that rate was tested using the two models. The results of this scenario, which are discussed below, indicated that a 20% reduction to the Baseline Scenario extraction rates, or the Initial Operating Yield, avoided Undesirable Results in all three management areas of the Basin. If the Watermaster Board determines that Rampdown is necessary, it will be phased in with annual steps. Measured groundwater elevations at Key Wells should be evaluated on an ongoing basis to confirm the projected simulated groundwater elevations and that Rampdown will result in groundwater elevations above minimum thresholds by the end of DWR water year 2039.

The total extraction rate for the Basin-wide Rampdown Scenario was 32,000 AFY (Table 3-4). Of the total, 14,734 AFY of groundwater was pumped in the WLPMA, 16,447 AFY was pumped in the ELPMA, and 819 AFY was pumped in the Epworth Gravels Management Area. The estimated sustainable yield of the WLPMA in the First Periodic Evaluation was 11,400 AFY, approximately 3,300 AFY lower than the simulated groundwater production in the Basin-wide Rampdown scenario. The simulated groundwater production in the Basin-wide Rampdown scenario in the Epworth Gravels Management Area was approximately 500 AFY lower, and in the ELPMA approximately 1,450 AFY lower, than the estimated sustainable yields in the First Period Evaluation (Table 3-3 and Table 3-4). Note that the Rampdown scenarios were modeled at the fully reduced pumping rate throughout the simulations. For this reason, the simulated groundwater elevations in the Rampdown scenarios may be overestimated.

3.4.1.2 Basin-wide Rampdown Scenario Groundwater Elevations

Epworth Gravels

Simulated groundwater elevations in the Epworth Gravels Management Area (in the Epworth Gravels aquifer) rose at a higher rate in the Basin-wide Rampdown Scenario than those in the Baseline Scenario (see 03N19W29F06S in Appendix B). This is consistent with the additional 20% reduction in groundwater pumping simulated under this Basin-wide Rampdown Scenario.

ELPMA

Simulated groundwater elevations remained above the minimum threshold at all Key Wells in the ELPMA and remained above the measurable objective in several Key Wells in the Basin-wide Rampdown Scenario (Figure 3-12 and Appendix B). Simulated groundwater elevations were higher in the Basin-wide Rampdown scenario than in the Baseline Scenario consistent with approximately 4,100 AFY lower groundwater ELPMA production than in the Basin-wide Rampdown Scenario. The simulated groundwater elevations were consistent with groundwater production rates that were lower than the estimated sustainable yield for the ELPMA.

WLPMA

In the WLPMA, simulated groundwater elevations remained above the minimum threshold groundwater elevation at two of three Key Wells in which groundwater elevations were below the minimum threshold in the Baseline Scenario (Figure 3-12). While the simulated groundwater elevation at well 02N20W06R01 did not rise above the minimum threshold during this scenario, the trend was relatively stable with an ending simulated groundwater elevation higher than at the start of the simulation. This result is similar to the Projects Scenario simulation (Section 3.3.2.1).

As discussed in Sections 2.1 and 3.3.2.1, the simulated response to reduced groundwater production from this well is dampened relative to historical observations due to the change in model boundary condition. Therefore, it is likely that a 20% reduction in groundwater production relative to the Initial Operating Yield will be sufficient to allow groundwater elevations at this well to recover and rise above the minimum threshold. For this reason, the 20% reduction is considered sufficient for this initial BOY Study. Ongoing groundwater monitoring will confirm whether future groundwater elevations stabilize above the minimum thresholds. If groundwater elevations do not rise above the minimum thresholds in this area of the Basin in the future, subsequent BOY Studies will need to investigate ways in which the groundwater elevations can be raised to avoid Undesirable Results.

3.4.1.3 Basin-wide Rampdown Scenario Water Budget

ELPMA and Epworth Gravels

The total inflow to the ELPMA and Epworth Gravels Management Areas in the Basin-wide Rampdown Scenario was approximately 1,900 AFY lower than the inflow in the Baseline Scenario (Figure 3-7). The reduction occurs because there is less inflow to the ELPMA from stream leakage due to reduced pumping and higher groundwater elevations. Consequently, groundwater inflows exceed groundwater outflows in this scenario by approximately 600 AFY. This is the only scenario modeled for this study in which groundwater inflows exceed groundwater outflows in the ELPMA and Epworth Gravels Management Area.

WLPMA

The total inflow to and outflow from the shallow aquifer system of the WLPMA in the Basin-wide Rampdown Scenario was reduced by approximately 900 AFY relative to the Baseline Scenario resulting in no net change in storage between the two scenarios (Figure 3-8). The total inflow to the LAS was reduced by approximately 1,400 AFY relative to the Baseline Scenario, and the groundwater production rate in the LAS was reduced by approximately 3,700 AFY relative to the Baseline scenario (Figure 3-9). The reduced inflows to the WLPMA are the result of the decrease in groundwater production, as higher groundwater elevations reduce the gradient between the shallow aquifer system and the LAS. The reduction in groundwater pumping exceeded the reduction in inflows to the WLPMA. Consequently, inflows exceeded outflows by approximately 500 AFY in the Basin-wide Rampdown Scenario.

3.4.2 Differential Rampdown Scenario

Both the water budget and the simulated groundwater levels in the Basin-wide Rampdown Scenario suggested that a 20% reduction to the groundwater production was necessary to avoid Undesirable Results in the WLPMA, but that a 20% reduction in the ELPMA and Epworth Gravels Management Area production rates would result in groundwater production at rates that were lower than the estimated sustainable yield for these management areas. Therefore, although not specified in the Judgment, this BOY Study considers a Differential Rampdown Scenario in which the groundwater production rate is reduced by 20% relative to the Initial Operating Yield in the WLPMA, but is reduced by a lower percentage in the ELPMA and Epworth Gravels Management Area.

3.4.2.1 Differential Rampdown Scenario Extraction Rates

The extraction rate for the WLPMA in the Differential Rampdown Scenario is the same as the WLPMA extraction rate in the Basin-wide Rampdown Scenario, as this reduction is needed to avoid Undesirable Results in the WLPMA if projects are not implemented (Table 3-4).

In the ELPMA and Epworth Gravels Management Area, previous model analyses from the First Periodic Evaluation were used to develop an initial estimate of a reduction factor, relative to the Baseline Scenario groundwater production rate, that would maintain groundwater elevations above the minimum threshold water level. The initial estimate was then tested using the ELP Model. Simulated groundwater elevations from this initial estimate were used to refine the reduction rate and that rate was tested again using the ELP Model. The results of this scenario, which are discussed below, indicated that an 11% reduction, relative to the Baseline Scenario extraction rates, or the initial Operating Yield, resulted in groundwater levels that would avoid Undesirable Results in the ELPMA and Epworth Gravels Management Area. Note that because Water Right Holders within the aerial extent of the Epworth Gravels Management Area commonly also have wells screened in the underlying aquifers in the ELPMA from which they may pump their allocation, the ELPMA and Epworth Gravels Management Area are simulated with a consistent Rampdown.

The total Basin extraction rate for the final Differential Rampdown Scenario was 33,943 AFY (Table 3-4). This rate is approximately equivalent to a 15% reduction of the initial Operating Yield for the Basin. Of the total, 14,734 AFY of groundwater was pumped in the WLPMA, which is the same as the production rate in the Basin-wide Rampdown Scenario. In the ELPMA, the groundwater production rate in the Differential Rampdown Scenario was 18,298 AFY, which is approximately 400 AFY higher than the sustainable yield estimate in the First Periodic Evaluation. In the Epworth Gravels Management Area, the groundwater production rate was 911 AFY, which is approximately 400 AFY lower than the estimated sustainable yield in the First Periodic Evaluation. But, as noted above and in Section 3.2.2,

Water Rights Holders within the areal extent of the Epworth Gravels Management Area typically also can extract from the underlying aquifers of the ELPMA. Less Rampdown was required to achieve the sustainability goals with the Differential Rampdown versus the Basin-wide Rampdown alternative.

As discussed in Section 2.1, the GSP established uncertainty bounds in the sustainable yield for the ELPMA estimated using the ELP Model. While the ELPMA production rate under the Differential Rampdown scenario is approximately 400 AFY higher than the estimated sustainable yield, it falls within the uncertainty bounds of the potential range of sustainable yields identified in the GSP and First Periodic Evaluation (FCGMA 2019, FCGMA 2024).

3.4.2.2 Differential Rampdown Scenario Groundwater Elevations

Epworth Gravels

Simulated groundwater elevations in the Epworth Gravels Management Area (in the Epworth Gravels aquifer) increased at a higher rate in the Differential Rampdown Scenario than those in the Baseline Scenario, but did not increase as rapidly as those in the Basin-wide Rampdown Scenario (Appendix B). This is consistent with the 11% reduction in groundwater pumping simulated within the Epworth Gravels Management Area (Epworth Gravels aquifer) under this scenario.

ELPMA

Simulated groundwater elevations remained above the minimum threshold at all Key Wells in the ELPMA and were similar to the simulated groundwater elevations in the Projects Scenario (Appendix B; Figure 3-13). The simulated groundwater elevations suggest that groundwater production at a rate of 18,300 AFY may be sustainable for the ELPMA, however, it should be noted that simulated groundwater elevations exhibited a declining trend over the 47-year modeled period (Figure 3-13).

WLPMA

The simulated future groundwater elevations in the WLPMA under the Differential Rampdown Scenario were the same as the simulated future groundwater elevations under the Basin-wide Rampdown Scenario because the WLPMA groundwater extraction rates in these scenarios were the same (Figures 3-11 and 3-12).

3.4.2.3 Differential Rampdown Scenario Water Budget

ELPMA and Epworth Gravels

The total inflow to the ELPMA and Epworth Gravels Management Areas in the Basin-wide Rampdown Scenario was approximately 1,200 AFY lower than the inflow in the Baseline Scenario (Figure 3-7). The reduction occurs because there is less inflow to the ELPMA from stream leakage. Groundwater elevations are higher in the Differential Rampdown scenario than in the Baseline Scenario because groundwater production in the ELPMA is approximately 2,300 AFY lower in the Differential Rampdown Scenario. Groundwater outflows exceed groundwater inflows in this scenario by approximately 400 AFY.

WLPMA

The water budget for the Differential Rampdown Scenario is the same as the water budget for the Basin-wide Rampdown Scenario in the WLPMA. The Basin-wide Rampdown Scenario water budget for the WLPMA is discussed in Section 3.4.1.3.

4 Estimate of Basin Optimization Yield

As defined in the Judgment and discussed in Section 1.3, the Basin Optimization Yield is the production rate, with implementation of the Basin Optimization Projects, that can be reasonably implemented by 2040, that maintains groundwater elevations above the MTs and the flux between the WLPMA and the Oxnard Subbasin, as discussed in Section 3.1.4. Based on the model scenarios simulated for this BOY Study, the Basin Optimization Yield is estimated at 40,000 AFY inclusive of the reductions by the in-lieu project wells of 3,140 AFY for a net yield for the remaining pumpers of 36,860 AFY if the in-lieu surface water delivery projects are implemented as shown in Table 3-4 and described as Project 2 (Purchase of Imported Water from CMWD for Basin Replenishment). This pumping maintains the Baseline Scenario production rates at all but six wells in the WLPMA and three wells in the ELPMA. The wells in which groundwater production is reduced are owned and operated by VCWWD-1, VCWWD-19, and Zone MWC.

The estimate of Basin Optimization Yield was derived through the use of numerical groundwater flow models, as described in this BOY Study, and subject to the uncertainty inherent in the models described in Section 2 and the scenario assumptions described in Section 3.1. Significant uncertainty also exists regarding how and where Water Right Holders pump their allocations, as discussed in Section 3.2.1. In accordance with the Judgment, Basin Optimization Yield must be re-evaluated at least every five years with the next BOY Study due in 2030.

The forecasted groundwater elevations simulated by the numerical modeling should be compared to measured groundwater elevations at Key Wells on an ongoing basis to confirm the validity of the model projections and adjust project operations, as necessary. Additionally, if Project 2 (Purchase of Imported Water from CMWD for Basin Replenishment) is not fully implemented in a timely manner as modeled in the Projects Scenario, or if Project 5 (Arroyo Simi-Las Posas Water Acquisition) is not implemented and the City of Simi Valley reduces discharges to the Arroyo Simi, then Rampdown may be necessary to achieve sustainable groundwater management by 2040.

5 Rampdown Rate

Numerical groundwater flow modeling for this initial BOY Study found that if Project 2: Purchase of Imported Water from CMWD for Basin Replenishment implemented as proposed, Rampdown may not be required. At the recommendation of TAC, two Rampdown scenarios were modeled to provide both the Watermaster Board and Water Right Holders with an understanding of the reduction in groundwater production necessary to reach sustainable conditions if Projects 2 and 5 are not implemented (Section 3.4).

5.1 Basin-wide Rampdown Rate

This initial BOY Study calculates a Rampdown Rate for a Basin-wide reduction in groundwater pumping if the projects are not implemented. The Rampdown Rate is the annual reduction in groundwater production necessary to have the Operating Yield equal the Sustainable Yield by the fall of 2039 (Judgment §§ 1.89 and 4.10.1.4).

1. The Rampdown was determined by subtracting the overall production modeled in the Basin-wide Rampdown Scenario (32,000 AFY) from the Initial Operating Yield (40,000 AFY).
2. The Rampdown (8,000 AFY) was divided by 14 water years to calculate the Rampdown Rate (assuming that Rampdown would begin in the fall of 2026 and that the groundwater production rate would equal 32,000 AFY by the fall of 2039).

The resulting Rampdown Rate, or the annual reduction in groundwater production that would result in an overall production rate of 32,000 AFY by the fall of 2039, is 571.4 AFY.

Future BOY Studies, which are to be prepared at least every five years, will each re-evaluate the Rampdown and the Rampdown Rate. Therefore, while the Rampdown Rate was calculated to reduce the Operating Yield to the Basin-wide Scenario groundwater production of 32,000 AFY (Section 3.4.1) by the fall of 2039, the resulting annual Basin-wide groundwater production is provided through September of 2030 in this initial BOY Study (Table 5-1). It should be noted again that the Rampdown calculations in this initial BOY Study, as shown in Table 5-1, are provided for informational purposes for consideration by the Watermaster Board of Directors should the projects not be implemented in a timely manner.

Table 5-1. Water Year 2027 through 2030 Rampdown Production

Water Year (October – September)	Groundwater Production Rate (AFY)				
	Basin-wide Rampdown	Differential Rampdown			
		WLPMA	ELPMA	Epworth Gravels Management Area	Differential Rampdown TOTAL
Oct 2026 – Sept 2027	39,429	18,154	20,398	1,016	39,567
Oct 2027 – Sept 2028	38,857	17,891	20,236	1,008	39,135
Oct 2028 – Sept 2029	38,286	17,628	20,075	1,000	38,702
Oct 2029 – Sept 2030	37,714	17,365	19,913	992	38,269

5.2 Differential Rampdown Rate

In addition to the Basin-wide Rampdown rate, this initial BOY Study also calculates a potential Differential Rampdown rate based on the Differential Rampdown Scenario for informational purposes. In that scenario groundwater production was reduced by 20% relative to the Baseline Scenario pumping in the WLPMA and by 11% in the ELPMA and Epworth Gravels Management Area. The overall groundwater production from the Basin is higher under this scenario than it is in the Basin-wide Rampdown (Table 3-4).

In order to calculate the annual Rampdown Rate for each management area under this scenario, the management area specific groundwater production modeled in the Differential Rampdown Scenario was subtracted from the Baseline Scenario groundwater production for each management area. The resulting Rampdown for the WLPMA is 3,683 AFY; the Rampdown for the ELPMA is 2,261 AFY; and the Rampdown for the Epworth Gravels Management Area is 113 AFY. The Rampdown for each management area was then divided by 14 water years to calculate the resulting management area specific Rampdown Rates that would result in an overall production rate of 33,943 AFY by the fall of 2039. These rates are 236.1 AFY for the WLPMA, 161.5 AFY for the ELPMA, and 8.1 AFY for the Epworth Gravels Management Area (Table 5-1).

6 Conclusions

Based on the numerical model scenarios simulated for this initial BOY Study, with consideration of the inherent limitations and uncertainties of the models (Section 3.1.5), if Basin Optimization Plan Project 2 (Purchase of Imported Water from CMWD for Basin Replenishment) is implemented as scheduled, the Basin Optimization Yield is estimated at 40,000 AFY inclusive of the reductions at the in-lieu project wells of 3,140 AFY resulting in net yield for the remaining pumpers of 36,860 AFY. However, if Project 2 is not implemented as scheduled, then Rampdown would be required so that the Operating Yield equals the sustainable yield by fall of 2039. Additionally, if Project 5 (Arroyo Simi-Las Posas Water Acquisition) is not implemented and the City of Simi Valley reduces discharges to the Arroyo Simi, then Rampdown may also be required. The Judgment states that "*following the first Basin Optimization Yield Study, Rampdown of the Operating Yield will commence in annual steps, if necessary*" (Judgment § 4.9.1.3).

If Projects 2 and 5 are not implemented as scheduled, this BOY Study outlines two potential no-project Rampdown scenarios for the Watermaster to consider, consistent with the TAC recommendation. The first is a Basin-wide Rampdown that found groundwater production of 20% in all management areas of the Basin, relative to the initial Operating Yield of 40,000 AFY, may be required to avoid Undesirable Results by 2040 (Sections 3.4.1 and 5.1).

The second is a no-project Rampdown scenario that differentially reduces groundwater production in the management areas relative to the initial Operating Yield of 40,000 AFY. Groundwater production in the ELPMA and Epworth Gravels Management Area are reduced by 11%, relative to the Baseline Scenario production in these management areas, and groundwater production in the WLPMA is reduced 20%, relative to the Baseline Scenario production (Sections 3.4.2 and 5.2). Although the process to implement a Differential Rampdown is more complex (Section 3.4), this BOY Study finds that the differential Rampdown approach avoids Undesirable Results while preserving higher overall groundwater production rates in the Basin.

As discussed in Section 2.2, the Coastal Plain Model boundary condition at the eastern edge of the WLPMA, adjacent to the Somis Fault, was updated by UWCD inconsistent with hydrogeologic conditions. This caused additional uncertainty in the model simulations. Future work should be conducted to reduce this uncertainty by modifying and recalibrating the revised model using a no-flow boundary condition to represent the hydrogeologic conceptual model of this area.

In conclusion, if the projects are fully implemented as scheduled, numerical modeling conducted for this BOY Study forecasts that Rampdown is unnecessary to maintain a Basin Optimization Yield of 40,000 AFY, inclusive of the pumping reduced through in-lieu deliveries of imported water. However, ongoing monitoring of the Key Wells will confirm that measured groundwater elevations are consistent with forecasted groundwater elevations simulated by the numerical models to provide assurance that Undesirable Results will not occur after 2040. Per the Judgment, the Basin Optimization Yield must be re-evaluated in 2030 and 2035, and could be re-evaluated earlier, if necessary. The 2030 BOY Study must be completed by February 1, 2030.

INTENTIONALLY LEFT BLANK

7 References

CMWD (Calleguas Municipal Water District). 2018. *Groundwater Flow Model of the East and South Las Posas Sub-basins – Preliminary Draft Report*. Torrance, California: Intera Geoscience and Engineering Solutions. January 2018.

FCGMA (Fox Canyon Groundwater Management Agency). 2019. *Groundwater Sustainability Plan for the Las Posas Valley Basin*. Available online: https://fcgma.org/groundwater-sustainability-plans-gsps/.

FCGMA (Fox Canyon Groundwater Management Agency). 2021. Update on Revised Groundwater Modeling and Updated Future Scenarios and Estimates of Sustainable Yield for the East Las Posas Management Area. October 27, 2021, FCGMA Board meeting.

FCGMA (Fox Canyon Groundwater Management Agency). 2024. First Periodic Evaluation: Groundwater Sustainability Plan for the Las Posas Valley Basin. Available online: https://fcgma.org/groundwater-sustainability-plans-gsps/.

FCGMA (Fox Canyon Groundwater Management Agency). 2025a. Las Posas Valley Basin Optimization Plan. Available online: https://fcgma.org/basin-optimization-plan/.

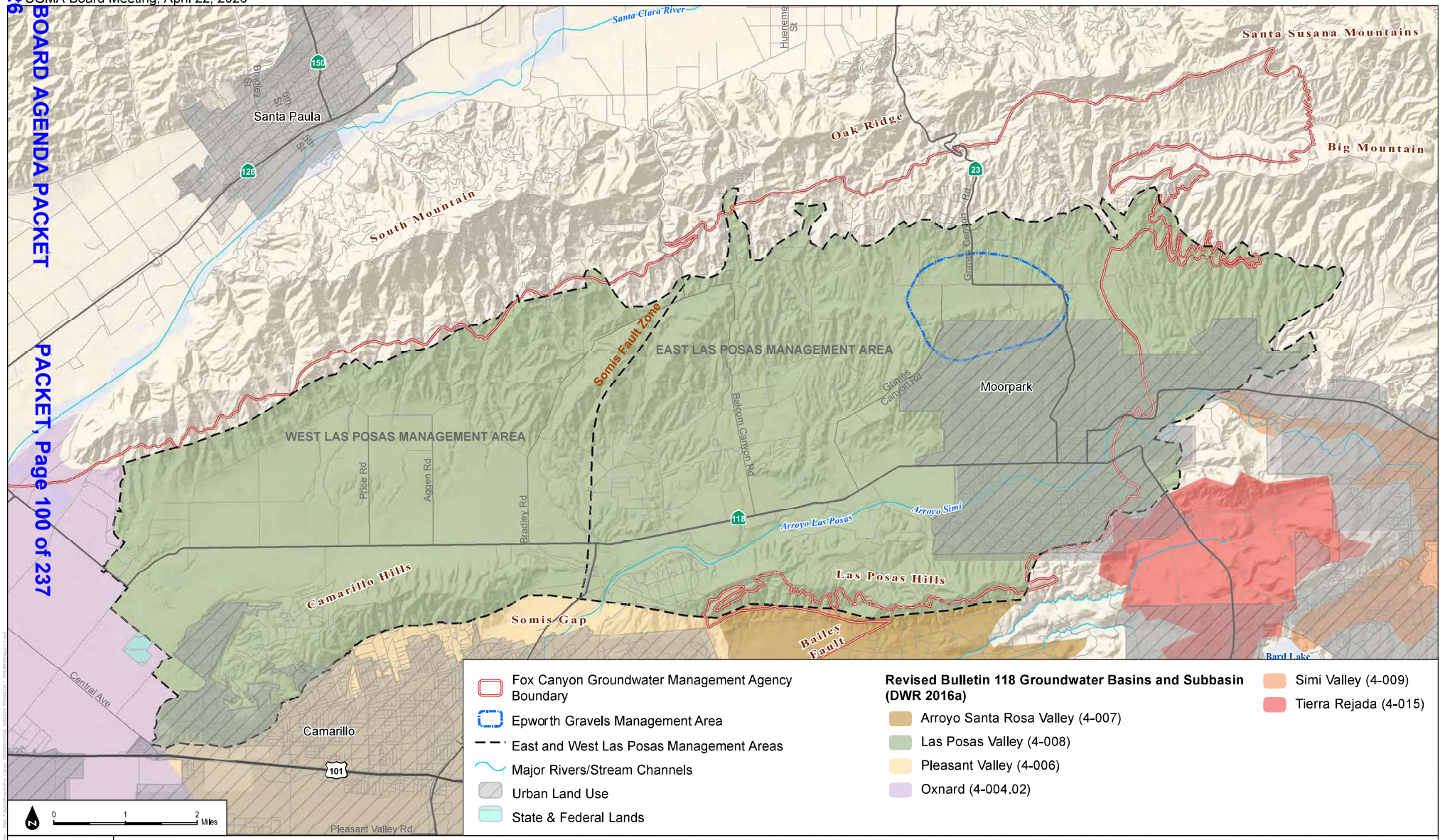
FCGMA (Fox Canyon Groundwater Management Agency). 2025b. Draft Las Posas Watermaster Response Report (June 9). Response Report to TAC Consultation Recommendation Report, BOYS Preferred Modeling Alternative and Impacts to Schedule. Available online: https://fcgma.org/recommendation-response-reports/wy-2024_rec-resp-reports/ (June 25, 2025 Board Agenda Item 13 Materials).

FCGMA (Fox Canyon Groundwater Management Agency). 2025c. Las Posas Valley Groundwater Sustainability Plan 2025 Annual Report: Covering Water Year 2024.

UWCD (United Water Conservation District) 2018. *Ventura Regional Groundwater Flow Model and Updated Hydrogeologic Conceptual Model: Oxnard Plain, Oxnard Forebay, Pleasant Valley, West Las Posas, and Mound Groundwater Basins*. Open File Report 2018-02. July 2018.

UWCD (United Water Conservation District). 2021. *Ventura Regional Groundwater Flow Model Expansion and Updated Hydrogeologic Conceptual Model for the Piru, Fillmore, and Santa Paula Groundwater Basins*. June 2021. Available online: https://www.unitedwater.org/wp-content/uploads/2022/09/UWCD_OFR_2021_01_Ventura_Regional_Groundwater_Flow_Model_Expansion.pdf

INTENTIONALLY LEFT BLANK



SOURCE: DWR; County of Ventura

FIGURE 1-1
Vicinity Map for the Las Posas Valley Basin

INTENTIONALLY LEFT BLANK

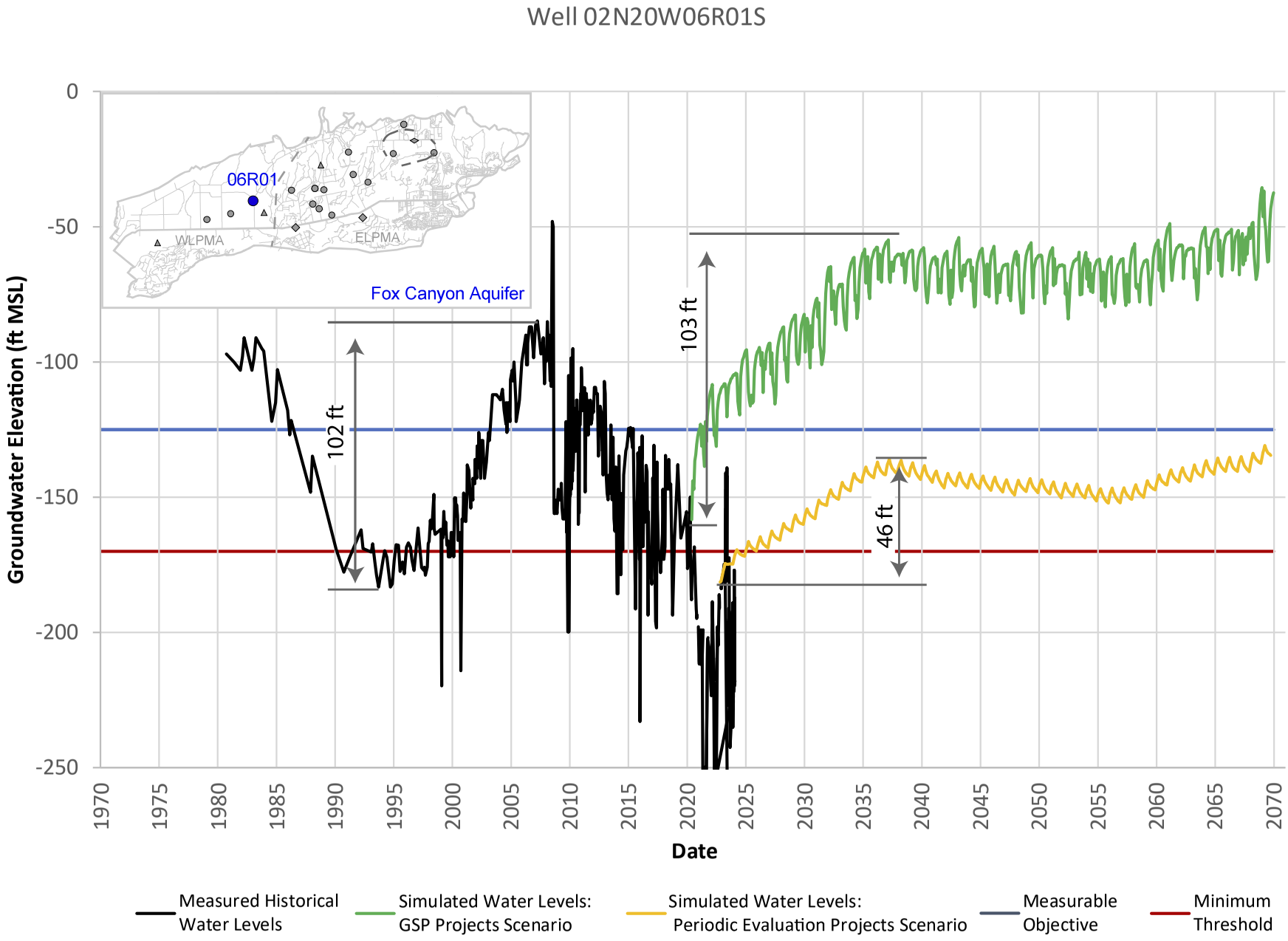
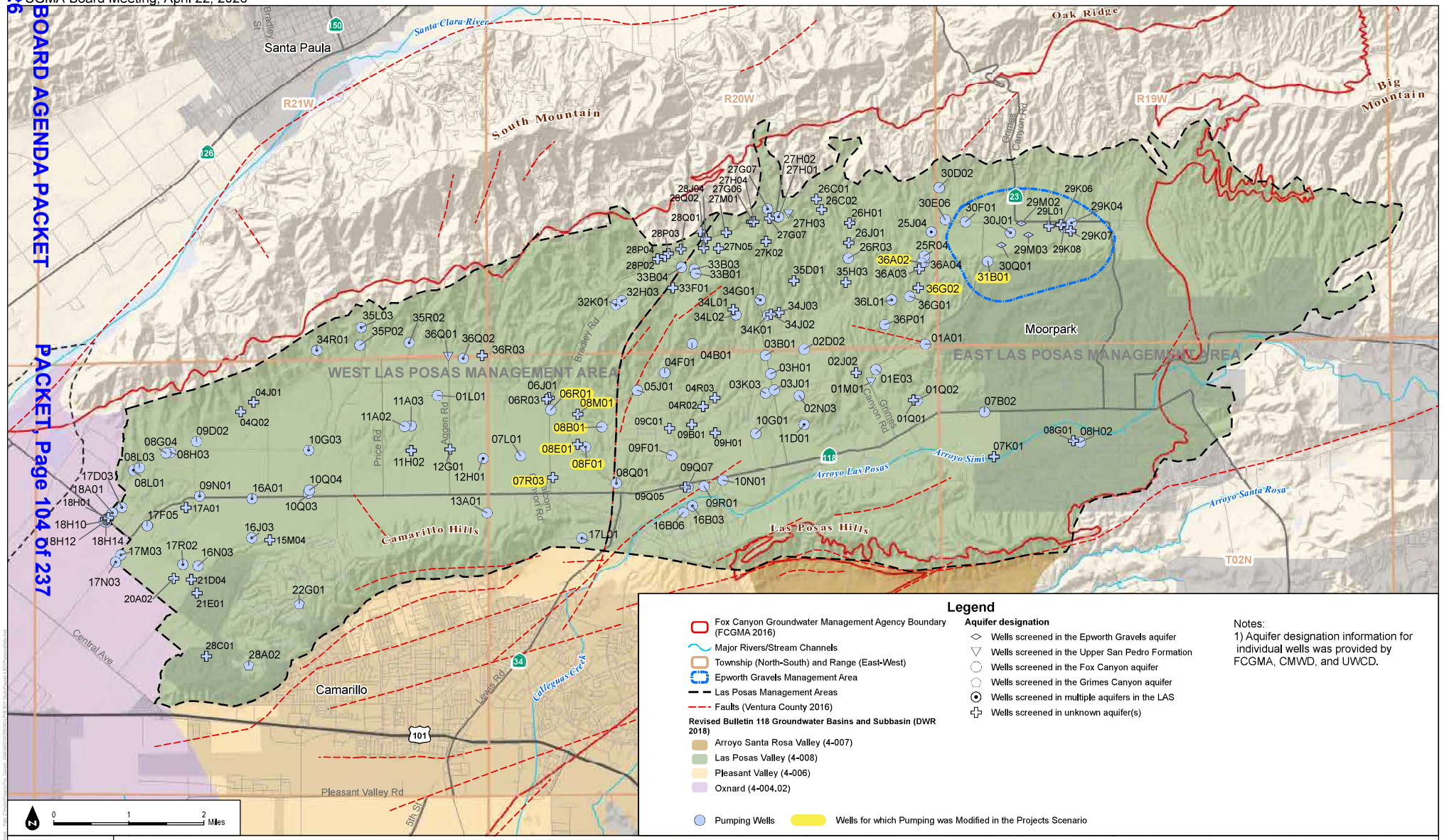


FIGURE 2-1

Groundwater Level Response Comparison in Well 02N20W06R01

INTENTIONALLY LEFT BLANK



SOURCE: DWR, FCGMA, VCWPD, UWCD, CMWD

FIGURE 3-1

Groundwater Production Wells Associated with WMIDs in the Las Posas Valley Basin

DUDEK

Basin Optimization Yield Study for the Las Posas Valley Basin

INTENTIONALLY LEFT BLANK

Baseline Scenario Pumping Distribution

Total Baseline Allocation by Watermaster ID (WMID): 40,000 AFY

USER TYPE

1 Water Right Holder that Pumps from Local Well

Pumps allocation from well(s) associated with their WMID.

For single well
Assign all allocation to single well

For multiple wells
Distribut e allocation based on pe rcentage of total pumping in each well for that user in WY2024.

2 Mutual Water Company (MWC) Exclusive User

Entire allocation pumped by MWC. No pumping from local wells associated with the WMID.

Assign all pumping to the MWC wells with which the WMID is associated

MWC pumping is distributed based on percentage of total pumping in each MWC well in WY2024.

3 Hybrid User

Allocation pumped by both WMID local well(s) and by MWC.

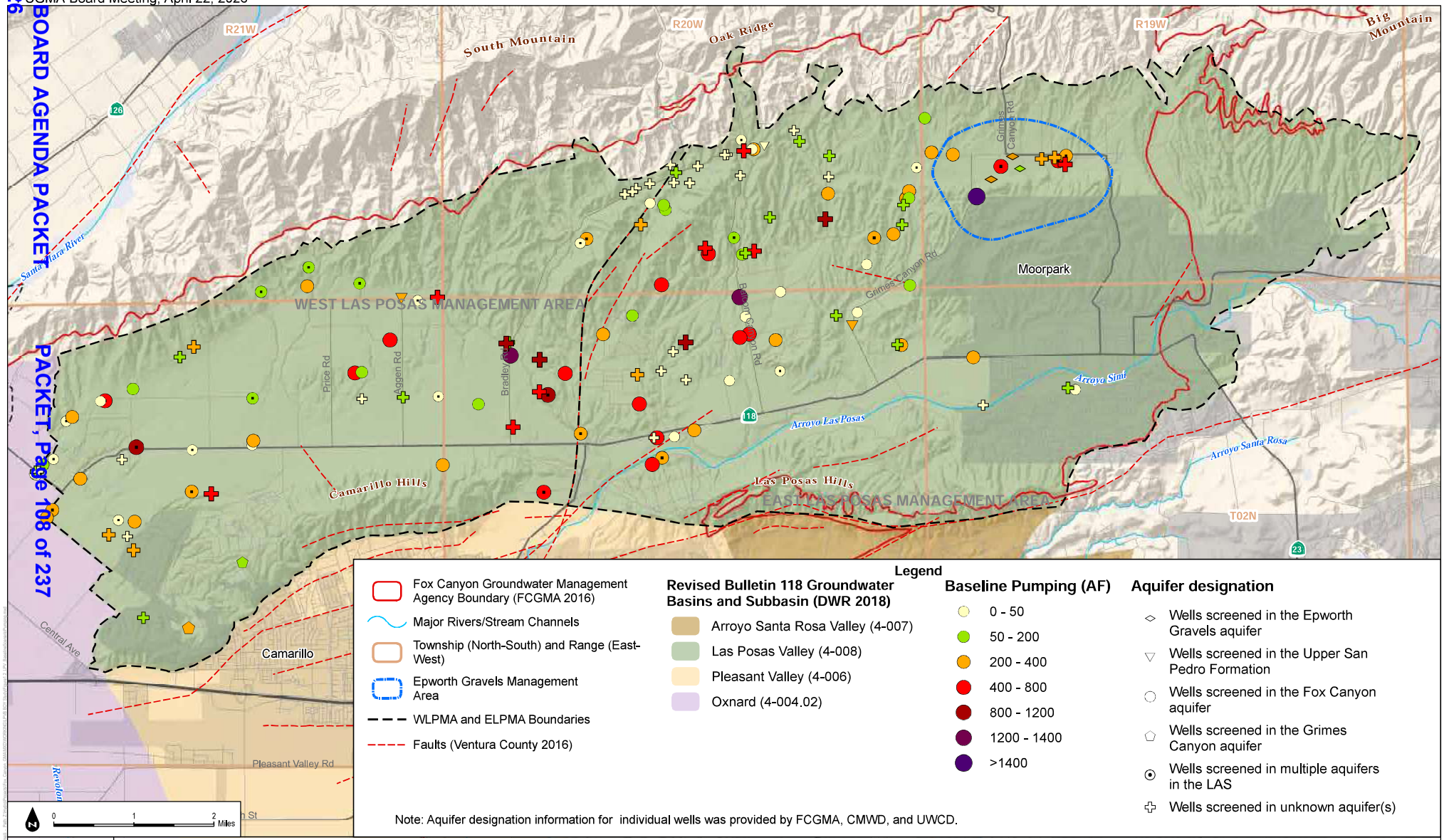
Determine the percentage of the total WY2024 use delivered by MWC and the percentage pumped

Distribute allocation to wells based on percentage of total pumping in each well in WY2024

Assign percentage of allocation to the MWC

FIGURE 3-2
Distribution of Pumping for Modeling

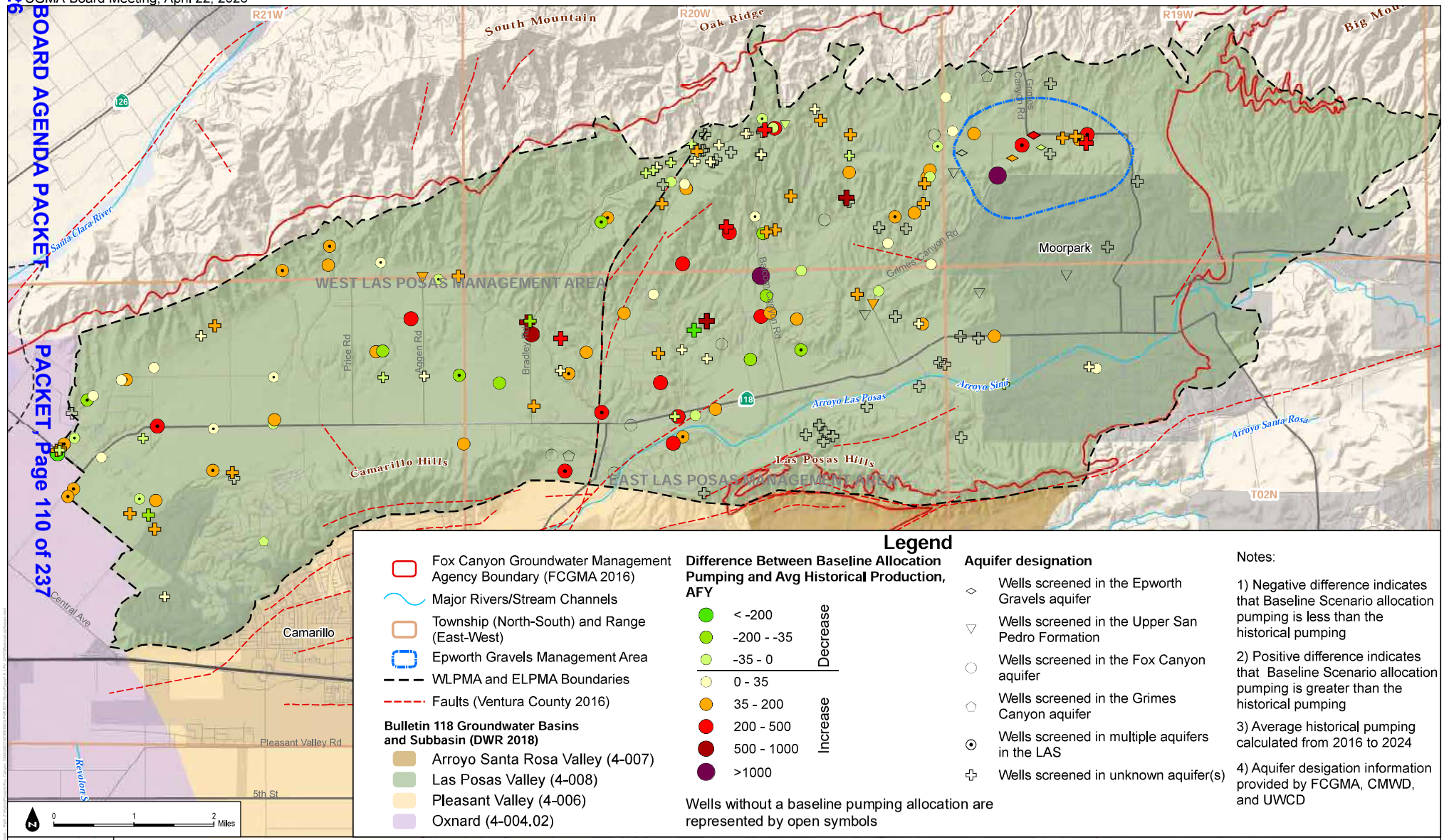
INTENTIONALLY LEFT BLANK



SOURCE: DWR, FCGMA, VCWPD, UWCD, CMWD

FIGURE 3-3
Baseline Scenario Allocation Pumping

INTENTIONALLY LEFT BLANK



Legend

- Fox Canyon Groundwater Management Agency Boundary (FCGMA 2016)
- Major Rivers/Stream Channels
- Township (North-South) and Range (East-West)
- Epworth Gravels Management Area
- WLPMA and ELPMA Boundaries
- Faults (Ventura County 2016)

Bulletin 118 Groundwater Basins and Subbasin (DWR 2018)

- Arroyo Santa Rosa Valley (4-007)
- Las Posas Valley (4-008)
- Pleasant Valley (4-006)
- Oxnard (4-004.02)

Difference Between Baseline Allocation Pumping and Avg Historical Production, AFY

Decrease
- < -200
- -200 - -35
- -35 - 0

Increase
- 0 - 35
- 35 - 200
- 200 - 500
- 500 - 1000
- >1000

Wells without a baseline pumping allocation are represented by open symbols

Aquifer designation

- Wells screened in the Epworth Gravels aquifer
- Wells screened in the Upper San Pedro Formation
- Wells screened in the Fox Canyon aquifer
- Wells screened in the Grimes Canyon aquifer
- Wells screened in multiple aquifers in the LAS
- Wells screened in unknown aquifer(s)

Notes:

1) Negative difference indicates that Baseline Scenario allocation pumping is less than the historical pumping

2) Positive difference indicates that Baseline Scenario allocation pumping is greater than the historical pumping

3) Average historical pumping calculated from 2016 to 2024

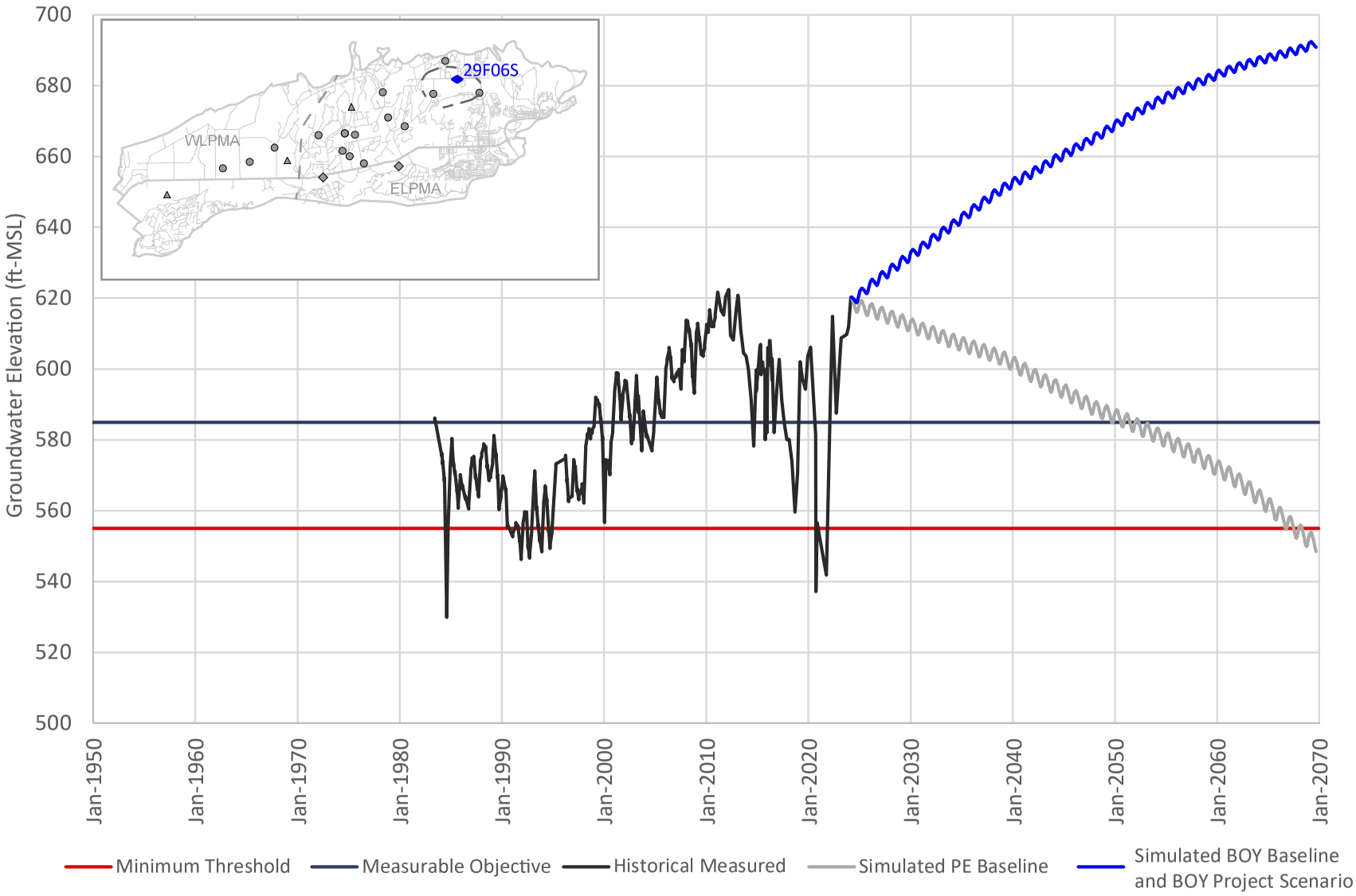
4) Aquifer desigation information provided by FCGMA, CMWD, and UWCD

SOURCE: DWR, FCGMA, VCWPD, UWCD, CMWD

FIGURE 3-4

Baseline Scenario Allocation Pumping Compared to the 2016-2024 Historical Average Pumping

INTENTIONALLY LEFT BLANK

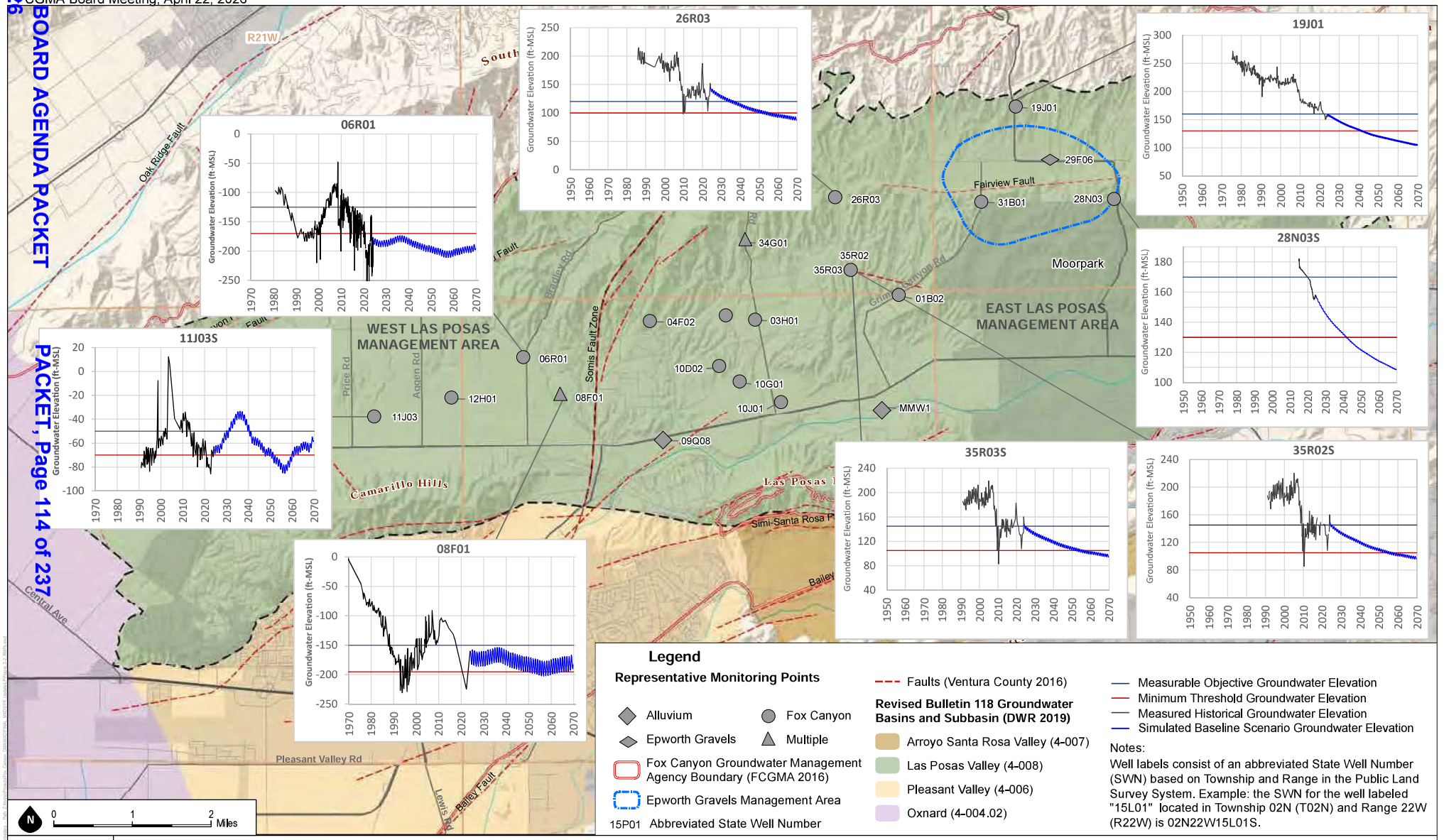


NOTE : The simulated groundwater levels have been shifted so that the initial modeled groundwater elevation is the same as the most recent measured groundwater elevation

FIGURE 3-5

Epworth Gravels Key Well Hydrograph: Well 03N19W29F06S

INTENTIONALLY LEFT BLANK



Legend

Representative Monitoring Points

- Alluvium
- Epworth Gravels
- Fox Canyon
- Multiple
- Fox Canyon Groundwater Management Agency Boundary (FCGMA 2016)
- Epworth Gravels Management Area
- 15P01 Abbreviated State Well Number
- Faults (Ventura County 2016)

Revised Bulletin 118 Groundwater Basins and Subbasin (DWR 2019)

- Arroyo Santa Rosa Valley (4-007)
- Las Posas Valley (4-008)
- Pleasant Valley (4-006)
- Oxnard (4-004.02)

- Measurable Objective Groundwater Elevation
- Minimum Threshold Groundwater Elevation
- Measured Historical Groundwater Elevation
- Simulated Baseline Scenario Groundwater Elevation

Notes:
Well labels consist of an abbreviated State Well Number (SWN) based on Township and Range in the Public Land Survey System. Example: the SWN for the well labeled "15L01" located in Township 02N (T02N) and Range 22W (R22W) is 02N22W15L01S.

SOURCE: DWR; Ventura County; UWCD; CMWD

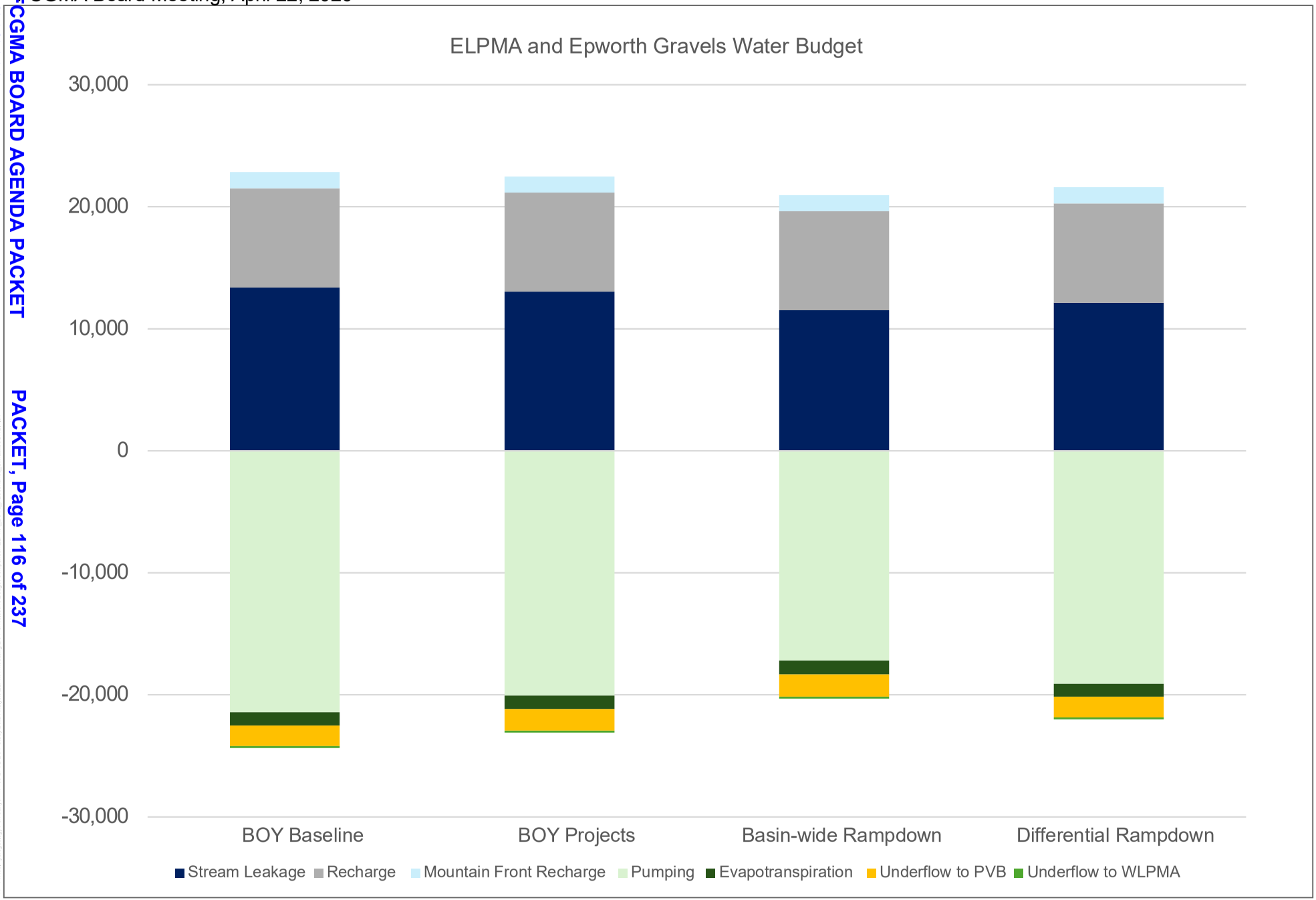
NOTE: The simulated groundwater levels have been shifted so that the initial modeled groundwater elevation is the same as the most recent measured groundwater elevation.

DUDEK

FIGURE 3-6

Baseline Scenario Groundwater Elevation Hydrograph Map

INTENTIONALLY LEFT BLANK

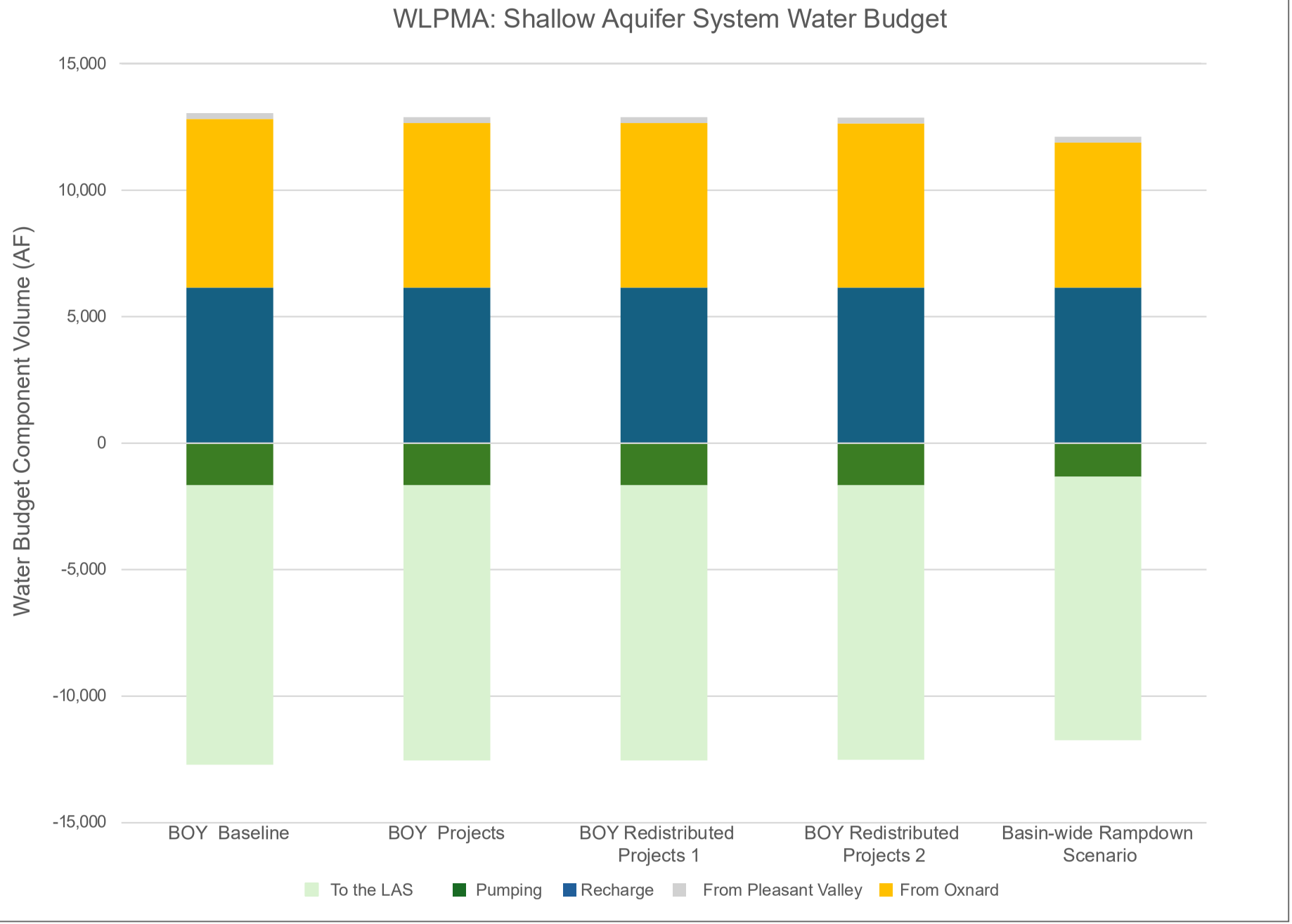


NOTE: The recharge term includes both precipitation recharge and return flows

FIGURE 3-7

Model Scenario Water Budgets for the ELPMA and Epworth Gravels Management Area

INTENTIONALLY LEFT BLANK

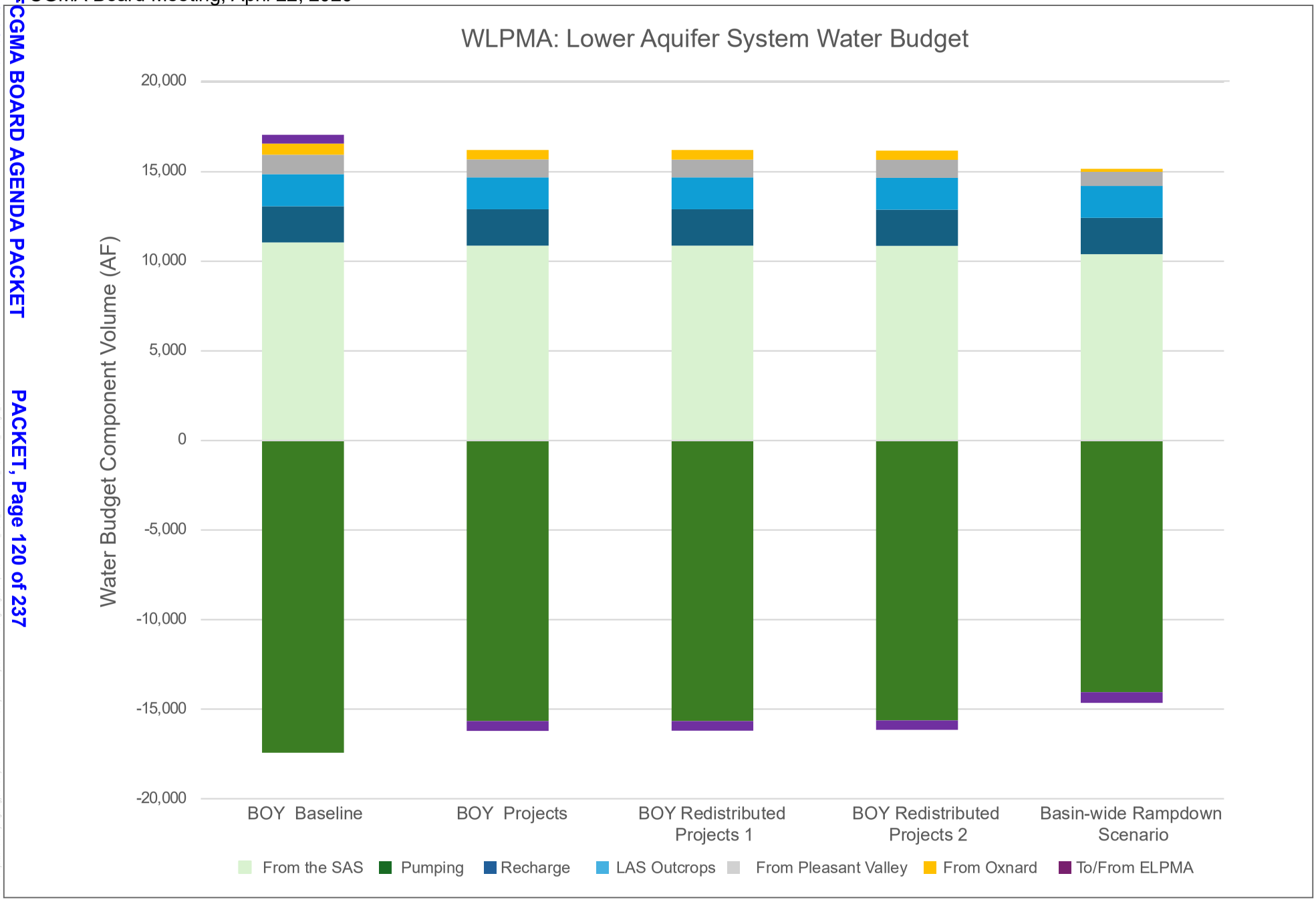


NOTE: The recharge term includes both precipitation recharge and return flows

FIGURE 3-8

Model Scenario Water Budgets for the WLPMA Shallow Aquifer System

INTENTIONALLY LEFT BLANK

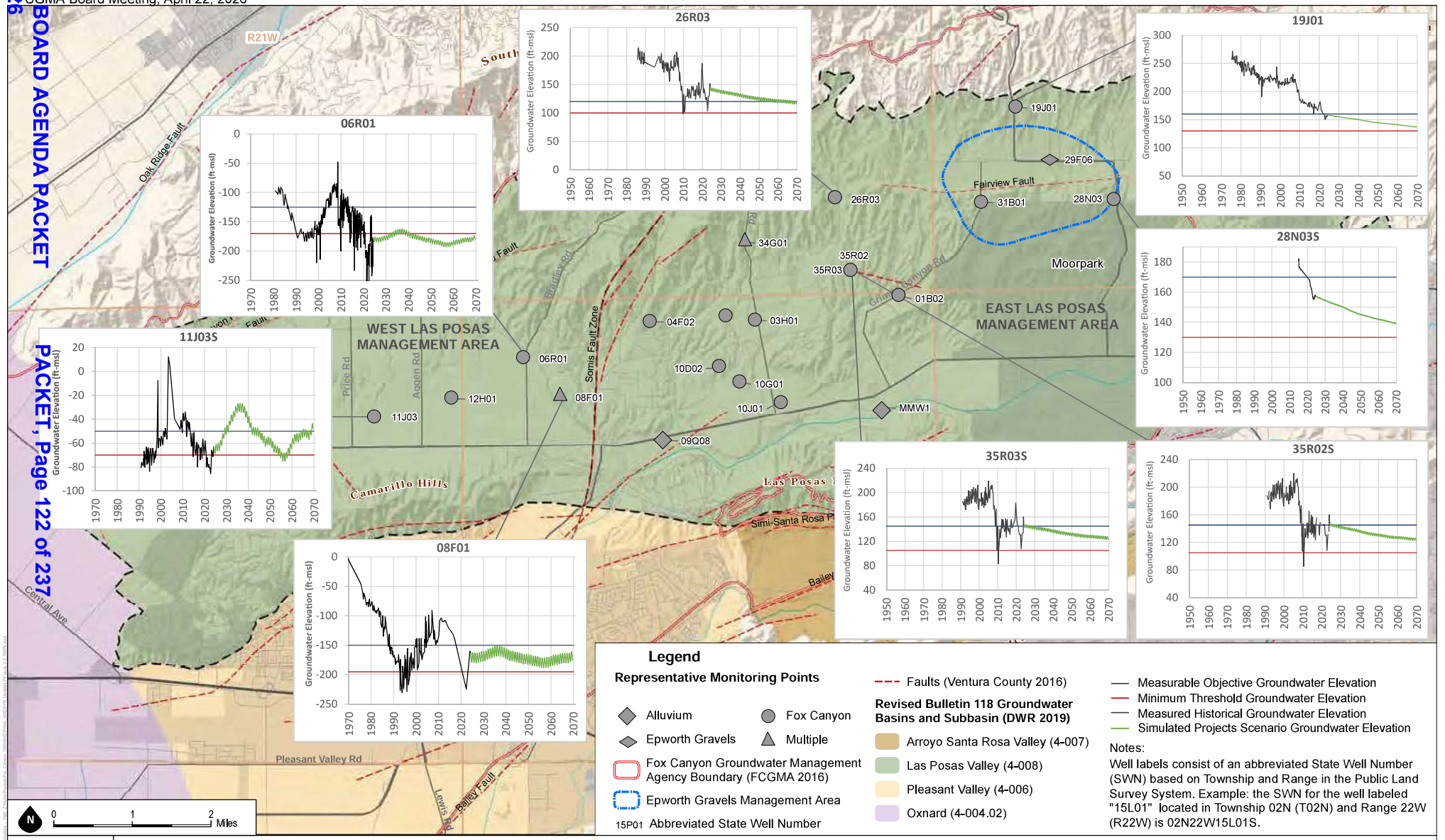


NOTE: The recharge term includes both precipitation recharge and return flows

FIGURE 3-9

Model Scenario Water Budgets for the WLPMA Lower Aquifer System

INTENTIONALLY LEFT BLANK



Legend

Representative Monitoring Points

- Alluvium
- Epworth Gravels
- Fox Canyon
- Multiple
- Fox Canyon Groundwater Management Agency Boundary (FCGMA 2016)
- Epworth Gravels Management Area
- 15P01 Abbreviated State Well Number
- Faults (Ventura County 2016)

Revised Bulletin 118 Groundwater Basins and Subbasin (DWR 2019)

- Arroyo Santa Rosa Valley (4-007)
- Las Posas Valley (4-008)
- Pleasant Valley (4-006)
- Oxnard (4-004.02)

- Measurable Objective Groundwater Elevation
- Minimum Threshold Groundwater Elevation
- Measured Historical Groundwater Elevation
- Simulated Projects Scenario Groundwater Elevation

Notes:
Well labels consist of an abbreviated State Well Number (SWN) based on Township and Range in the Public Land Survey System. Example: the SWN for the well labeled "15L01" located in Township 02N (T02N) and Range 22W (R22W) is 02N22W15L01S.

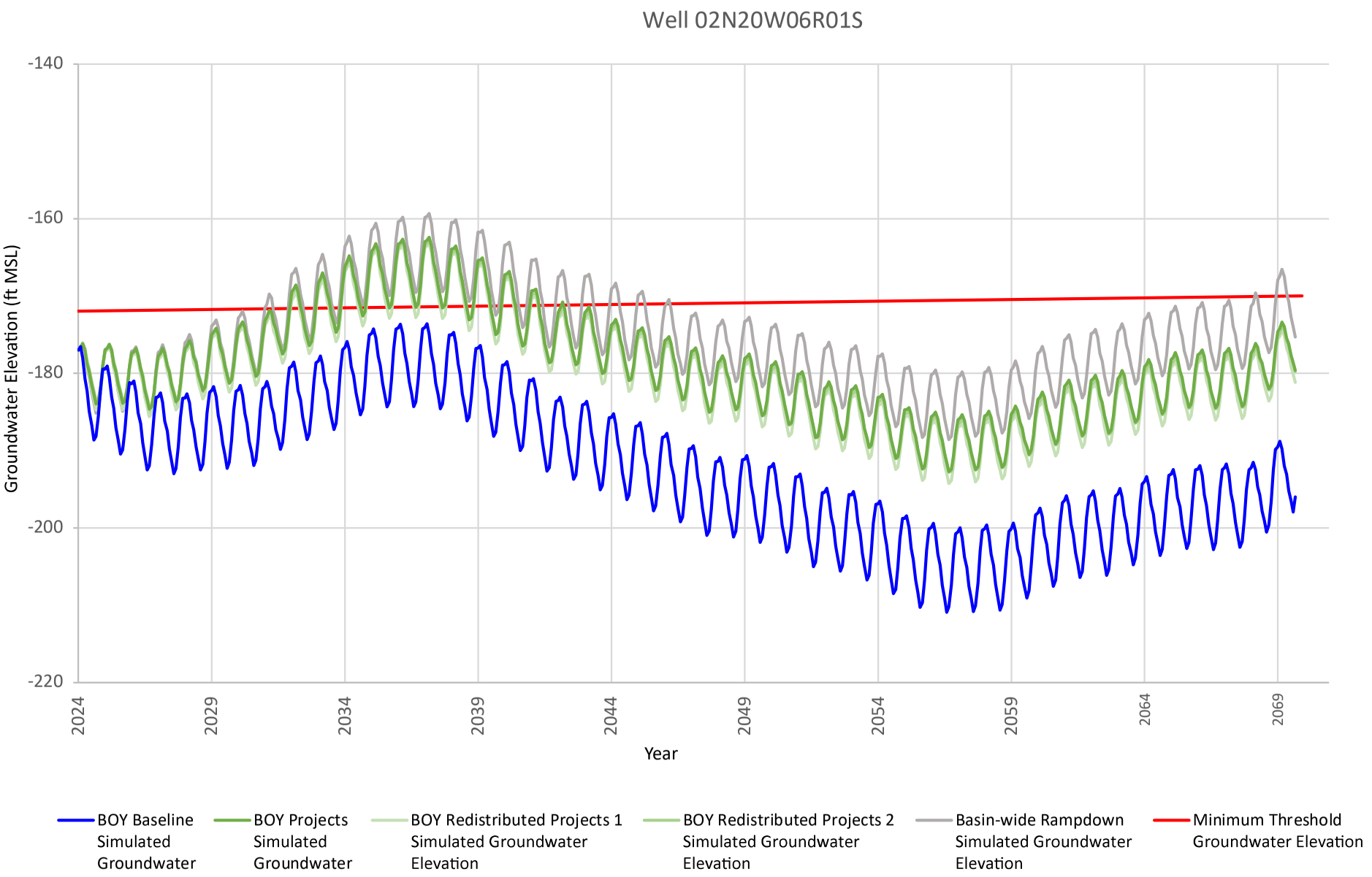
SOURCE: DWR; Ventura County; UWCD; CMWD

NOTE: The simulated groundwater levels have been shifted so that the initial modeled groundwater elevation is the same as the most recent measured groundwater elevation.

DUDEK

FIGURE 3-10
Projects Scenario Groundwater Elevation Hydrograph Map

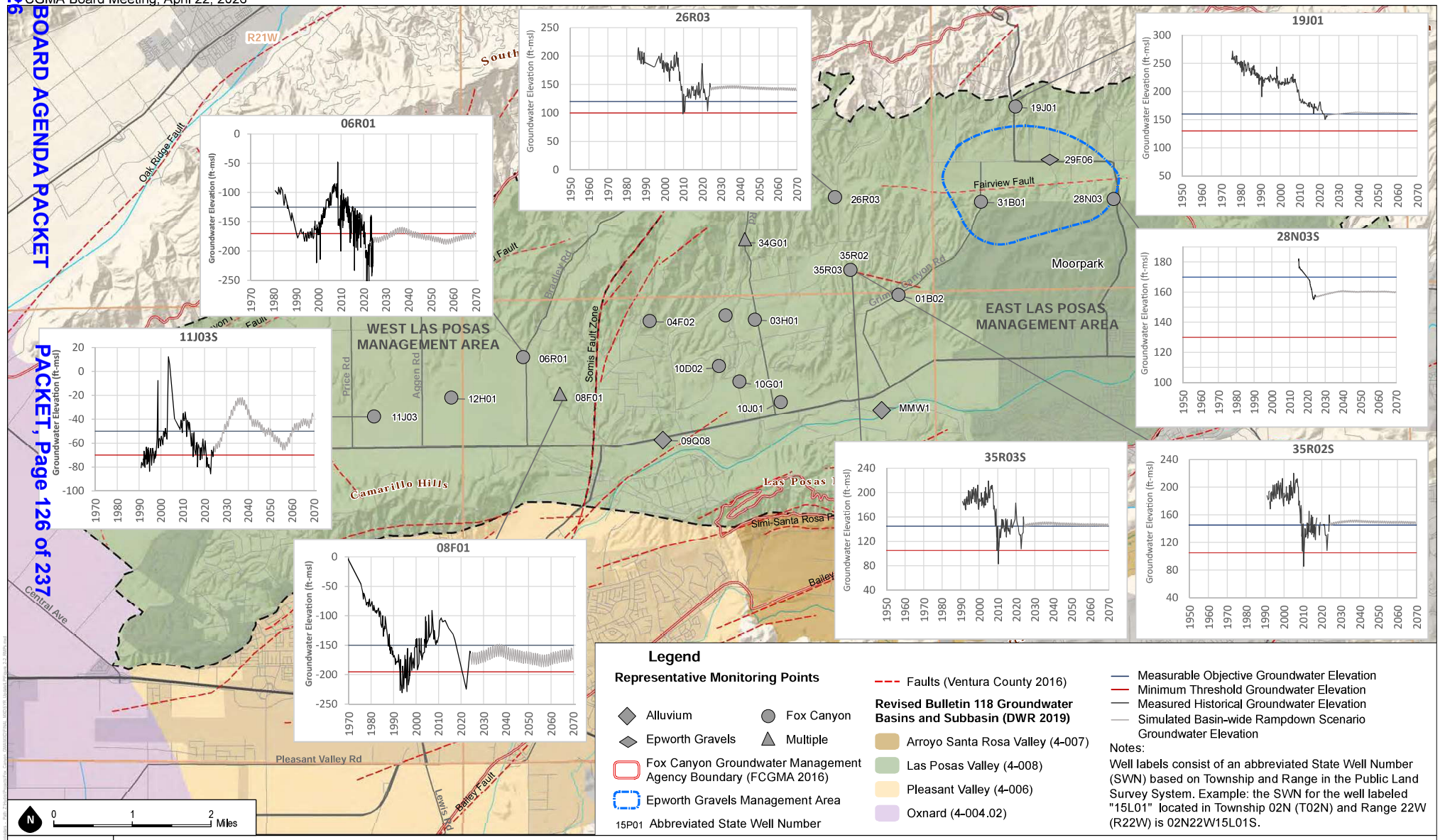
INTENTIONALLY LEFT BLANK



NOTE: The simulated groundwater levels have been shifted so that the initial modeled groundwater elevation is the same as the most recent measured groundwater elevation.

FIGURE 3-11
Simulated Groundwater Elevations in Well 02N20W06R01

INTENTIONALLY LEFT BLANK



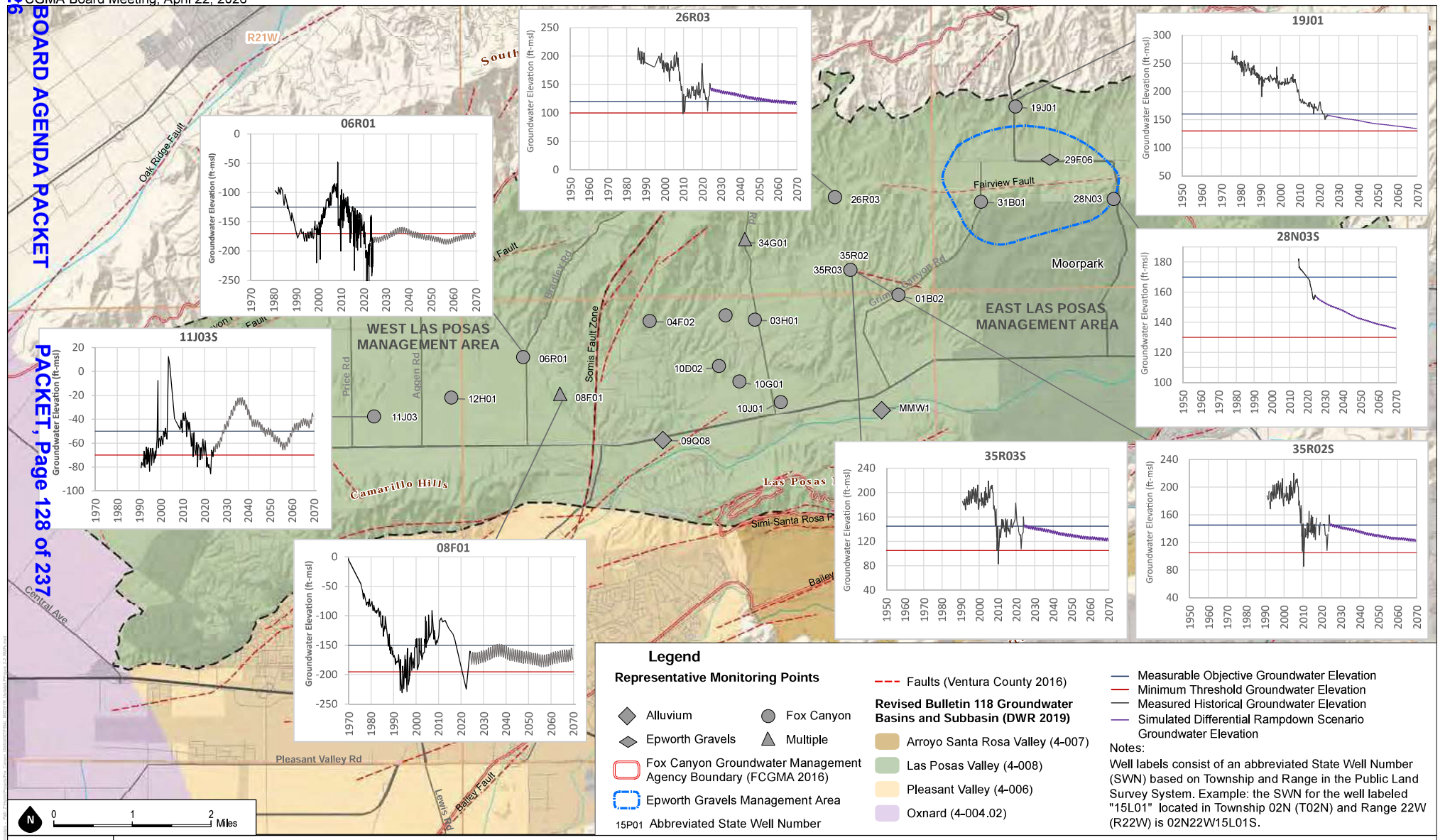
SOURCE: DWR; Ventura County; UWCD; CMWD

NOTE: The simulated groundwater levels have been shifted so that the initial modeled groundwater elevation is the same as the most recent measured groundwater elevation.

FIGURE 3-12

Basin-wide Rampdown Scenario Groundwater Elevation Hydrograph Map

INTENTIONALLY LEFT BLANK



SOURCE: DWR; Ventura County; UWCD; CMWD

NOTE: The simulated groundwater levels have been shifted so that the initial modeled groundwater elevation is the same as the most recent measured groundwater elevation.

FIGURE 3-13

Differential Rampdown Scenario Groundwater Elevation Hydrograph Map

INTENTIONALLY LEFT BLANK

Appendix A

BOY Baseline Allocation Groundwater Production Rates

State Well Number	Management Area	BOY Baseline Scenario Groundwater Pumping (AFY)	Average Historical Groundwater Pumping (AFY)	Difference (AFY)
02N19W07B02	ELPMA	300.8	196.9	103.9
02N19W07K01	ELPMA	21.5	35.2	-13.7
02N19W08G01	ELPMA	61.3	35.2	26.2
02N19W08H02	ELPMA	31.3	18.5	12.8
02N20W01A01	ELPMA	85.1	51.3	33.7
02N20W01E03	ELPMA	43.8	58.5	-14.7
02N20W01J01	ELPMA	24.9	12.5	12.4
02N20W01M01	ELPMA	216.1	113.4	102.7
02N20W01Q01	ELPMA	82.4	63.9	18.5
02N20W01Q02	ELPMA	275.7	129.3	146.4
02N20W02D02	ELPMA	0.0	30.6	-30.6
02N20W02J02S	ELPMA	76.3	36.9	39.4
02N20W02N03	ELPMA	383.6	192.1	191.5
02N20W03B01	ELPMA	1383.6	336.1	1047.4
02N20W03H01	ELPMA	0.9	89.7	-88.7
02N20W03J01	ELPMA	478.4	309.9	168.5
02N20W04B01	ELPMA	614.8	248.0	366.7
02N20W04F01	ELPMA	144.3	119.7	24.6
02N20W04R02	ELPMA	22.6	126.8	-104.2
02N20W04R03	ELPMA	1248.1	649.2	598.9
02N20W05J01	ELPMA	326.4	268.3	58.1
02N20W08Q01	ELPMA	372.6	102.8	269.8
02N20W09B01	ELPMA	27.4	18.2	9.2
02N20W09C01	ELPMA	245.6	147.2	98.4
02N20W09F01	ELPMA	504.9	179.4	325.5
02N20W09H01	ELPMA	28.4	17.2	11.2
02N20W09Q05	ELPMA	30.2	41.2	-11.1
02N20W09Q07	ELPMA	747.0	436.5	310.6
02N20W09R01	ELPMA	24.4	34.1	-9.7
02N20W10G01	ELPMA	47.5	87.3	-39.7
02N20W10N01	ELPMA	248.3	158.8	89.5
02N20W11D01	ELPMA	0.0	81.7	-81.7
02N20W16B03	ELPMA	288.5	145.1	143.3
02N20W16B06	ELPMA	405.9	165.5	240.4
03N19W17Q01	ELPMA	29.2	11.4	17.8
03N19W18Q01	ELPMA	172.3	2.2	170.1
03N19W20G01	ELPMA	5.9	47.3	-41.3
03N19W29F07	ELPMA	38.9	19.7	19.2
03N19W29K04	ELPMA	378.3	176.2	202.1
03N19W29K07	ELPMA	428.9	287.8	141.1
03N19W29K08	ELPMA	695.4	391.5	303.9

State Well Number	Management Area	BOY Baseline Scenario Groundwater Pumping (AFY)	Average Historical Groundwater Pumping (AFY)	Difference (AFY)
03N19W30D02	ELPMA	171.8	166.6	5.1
03N19W30E06	ELPMA	273.5	268.5	5.1
03N19W30F01	ELPMA	218.7	67.8	150.9
03N19W30J01	ELPMA	448.0	200.7	247.3
03N19W31B01	ELPMA	1959.9	446.1	1513.8
03N19W31H01	ELPMA	0.0	200.4	-200.4
03N20W24P03	ELPMA	66.6	41.6	25.0
03N20W25J04	ELPMA	0.0	31.2	-31.2
03N20W25R04	ELPMA	277.9	129.0	148.8
03N20W26C01	ELPMA	1.0	0.1	0.9
03N20W26C02	ELPMA	77.7	18.9	58.8
03N20W26D01	ELPMA	0.0	0.0	0.0
03N20W26H01	ELPMA	115.3	71.4	43.9
03N20W26J01	ELPMA	1.2	2.5	-1.4
03N20W26R03	ELPMA	213.2	84.2	129.1
03N20W27B03	ELPMA	38.0	35.6	2.4
03N20W27G05	ELPMA	0.0	0.0	0.0
03N20W27G06	ELPMA	30.7	15.4	15.4
03N20W27G07	ELPMA	20.4	5.6	14.8
03N20W27H01	ELPMA	316.0	86.4	229.6
03N20W27H02	ELPMA	1.4	10.2	-8.8
03N20W27H03	ELPMA	0.0	0.3	-0.3
03N20W27H04	ELPMA	485.8	129.3	356.5
03N20W27J01	ELPMA	6.3	0.0	6.3
03N20W27K02	ELPMA	1.0	0.4	0.6
03N20W27M01	ELPMA	0.0	0.4	-0.4
03N20W27M01	ELPMA	2.0	0.6	1.4
03N20W27N01	ELPMA	0.0	5.6	-5.6
03N20W27N05	ELPMA	1.0	0.5	0.5
03N20W28J04	ELPMA	63.5	27.6	35.8
03N20W28Q02	ELPMA	29.9	19.1	10.9
03N20W33B01	ELPMA	59.7	58.7	0.9
03N20W33B03	ELPMA	61.8	24.4	37.4
03N20W33F01	ELPMA	231.8	58.9	172.9
03N20W34G01	ELPMA	87.3	65.2	22.0
03N20W34J02	ELPMA	101.4	42.3	59.1
03N20W34J03	ELPMA	65.0	7.2	57.8
03N20W34J03	ELPMA	335.4	243.4	91.9
03N20W34K01	ELPMA	165.0	212.7	-47.7
03N20W34L01	ELPMA	402.8	154.1	248.7
03N20W34L02	ELPMA	754.6	375.5	379.1

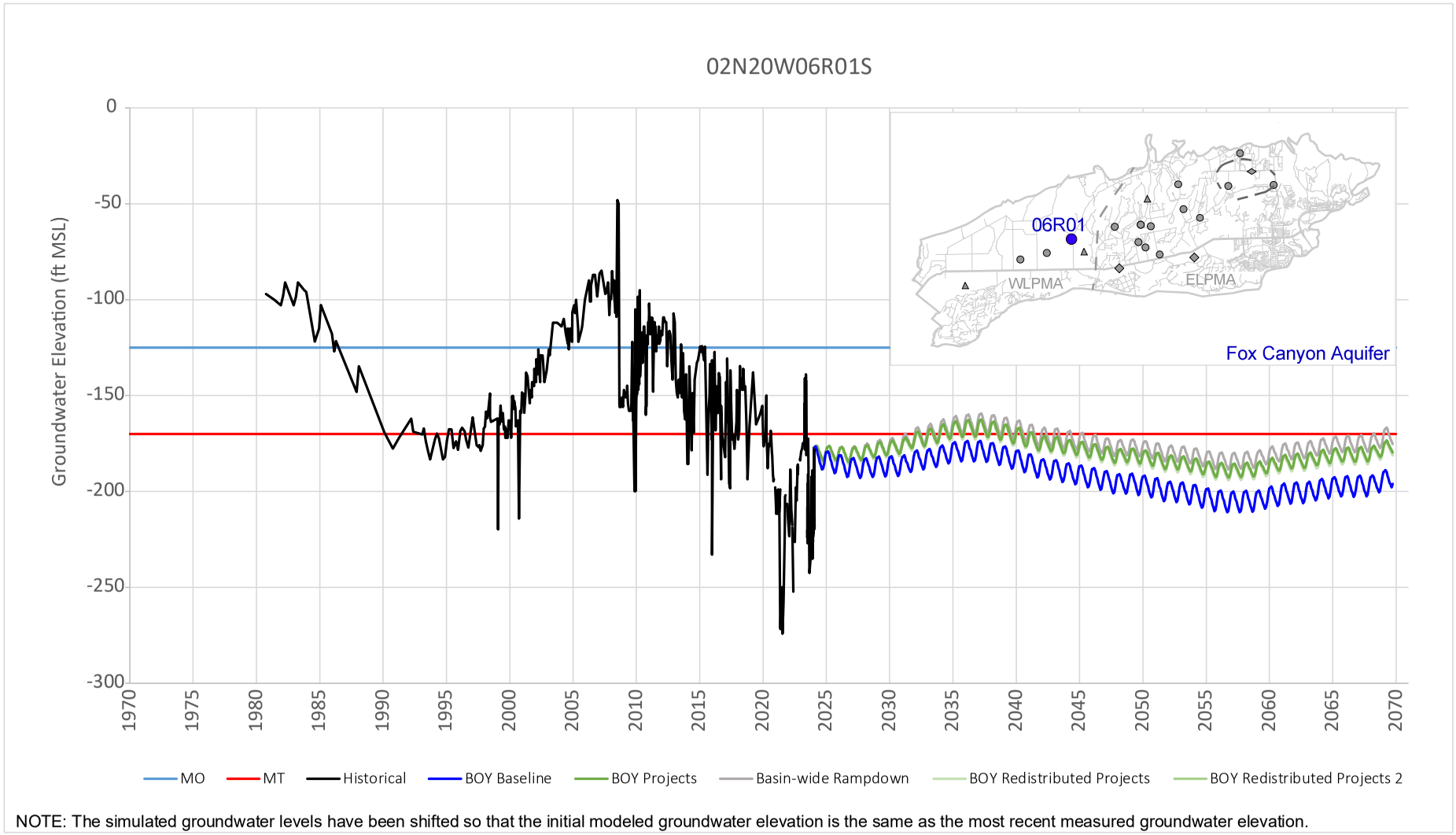
State Well Number	Management Area	BOY Baseline Scenario Groundwater Pumping (AFY)	Average Historical Groundwater Pumping (AFY)	Difference (AFY)
03N20W35D01	ELPMA	129.0	80.8	48.2
03N20W35H03	ELPMA	1197.8	573.4	624.4
03N20W36A02	ELPMA	331.5	156.7	174.8
03N20W36A03	ELPMA	71.4	31.2	40.1
03N20W36A04	ELPMA	82.3	99.1	-16.8
03N20W36G01	ELPMA	257.1	175.4	81.7
03N20W36G02	ELPMA	156.9	89.8	67.0
03N20W36L01	ELPMA	241.5	94.0	147.5
03N20W36P01	ELPMA	36.2	19.9	16.3
03N19W29K06	Epworth Gravels	253.2	170.3	82.9
03N19W29L01	Epworth Gravels	204.9	83.6	121.3
03N19W29M02	Epworth Gravels	239.1	21.6	217.6
03N19W29M03	Epworth Gravels	119.7	162.2	-42.5
03N19W30Q01	Epworth Gravels	207.3	158.3	48.9
02N20W06J01	WLPMA	75.6	120.7	-45.1
02N20W06R01	WLPMA	1258.7	725.6	533.1
02N20W06R03	WLPMA	1087.7	361.2	726.5
02N20W07L01	WLPMA	95.6	251.9	-156.3
02N20W07R03	WLPMA	508.4	335.8	172.6
02N20W08B01	WLPMA	647.1	518.1	128.9
02N20W08E01	WLPMA	410.8	386.5	24.3
02N20W08F01	WLPMA	1053.0	911.8	141.2
02N20W08M01	WLPMA	1050.6	747.0	303.5
02N20W17L01	WLPMA	545.5	318.5	227.0
02N21W01L01	WLPMA	655.8	406.2	249.6
02N21W04J01	WLPMA	239.6	153.2	86.3
02N21W04Q02	WLPMA	172.9	152.1	20.8
02N21W08G04	WLPMA	11.8	2.8	8.9
02N21W08H03	WLPMA	655.4	539.8	115.6
02N21W08L01	WLPMA	0.0	97.6	-97.6
02N21W08L02	WLPMA	0.0	84.3	-84.3
02N21W08L03	WLPMA	347.1	326.4	20.6
02N21W09D02	WLPMA	86.5	52.0	34.5
02N21W09N01	WLPMA	1176.7	866.9	309.7
02N21W10G03	WLPMA	84.3	62.3	22.0
02N21W10Q03	WLPMA	0.0	7.4	-7.4
02N21W10Q04	WLPMA	354.6	296.3	58.4
02N21W11A02	WLPMA	609.5	445.7	163.8
02N21W11A03	WLPMA	178.4	296.2	-117.7
02N21W11H02	WLPMA	23.5	35.1	-11.6
02N21W12G01	WLPMA	164.0	142.1	22.0

State Well Number	Management Area	BOY Baseline Scenario Groundwater Pumping (AFY)	Average Historical Groundwater Pumping (AFY)	Difference (AFY)
02N21W12H01	WLPMA	0.0	86.8	-86.8
02N21W12H02	WLPMA	211.1	195.0	16.1
02N21W13A01	WLPMA	332.4	234.9	97.5
02N21W15M04	WLPMA	479.4	420.3	59.2
02N21W16A01	WLPMA	1.0	0.5	0.4
02N21W16J03	WLPMA	344.0	280.0	64.0
02N21W16N03	WLPMA	307.9	197.1	110.7
02N21W17A01	WLPMA	13.2	21.1	-8.0
02N21W17D03	WLPMA	4.0	9.1	-5.2
02N21W17F05	WLPMA	222.9	194.0	28.9
02N21W17M03	WLPMA	285.2	218.1	67.1
02N21W17N03	WLPMA	205.6	150.9	54.7
02N21W17R02	WLPMA	1.7	23.8	-22.1
02N21W18A01	WLPMA	184.7	149.1	35.6
02N21W18H01	WLPMA	175.0	74.9	100.0
02N21W18H03	WLPMA	768.5	256.8	511.7
02N21W18H08	WLPMA	15.6	50.2	-34.6
02N21W18H10	WLPMA	17.2	7.6	9.6
02N21W18H11	WLPMA	79.9	15.9	64.0
02N21W18H12	WLPMA	177.9	368.6	-190.7
02N21W18H14	WLPMA	47.2	398.7	-351.5
02N21W20A02	WLPMA	202.5	152.2	50.3
02N21W21D04	WLPMA	16.6	102.4	-85.8
02N21W21E01	WLPMA	312.6	164.9	147.7
02N21W22G01	WLPMA	193.8	218.9	-25.1
02N21W28A02	WLPMA	492.6	438.5	54.1
02N21W28C01	WLPMA	192.7	192.0	0.7
03N20W28J05	WLPMA	1.0	1.2	-0.2
03N20W28P01	WLPMA	0.0	1.1	-1.1
03N20W28P02	WLPMA	1.0	1.0	0.0
03N20W28P03	WLPMA	26.2	5.5	20.6
03N20W28P04	WLPMA	24.5	26.3	-1.8
03N20W28Q01	WLPMA	10.6	17.0	-6.3
03N20W32H03	WLPMA	201.3	98.3	103.0
03N20W32K01	WLPMA	3.6	76.5	-72.9
03N20W33B04	WLPMA	16.3	40.6	-24.3
03N21W34R01	WLPMA	188.5	66.3	122.2
03N21W35L03	WLPMA	109.5	56.6	52.9
03N21W35P02	WLPMA	229.2	109.4	119.8
03N21W35R02	WLPMA	185.2	153.1	32.1
03N21W36Q01	WLPMA	239.2	148.6	90.6

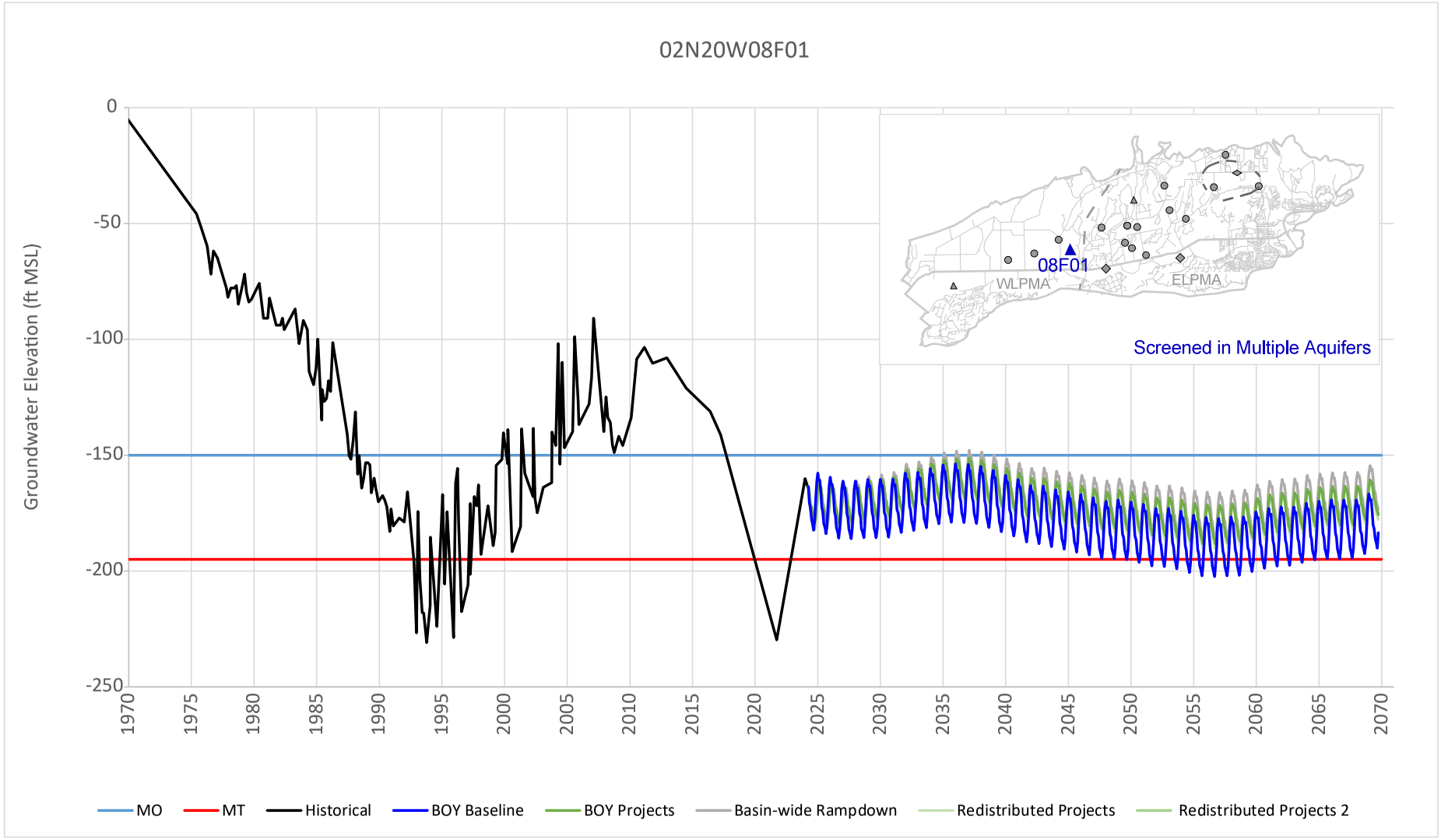
APPENDIX A

State Well Number	Management Area	BOY Baseline Scenario Groundwater Pumping (AFY)	Average Historical Groundwater Pumping (AFY)	Difference (AFY)
03N21W36Q02	WLPMA	0.2	27.0	-26.8
03N21W36R03	WLPMA	402.7	306.6	96.1

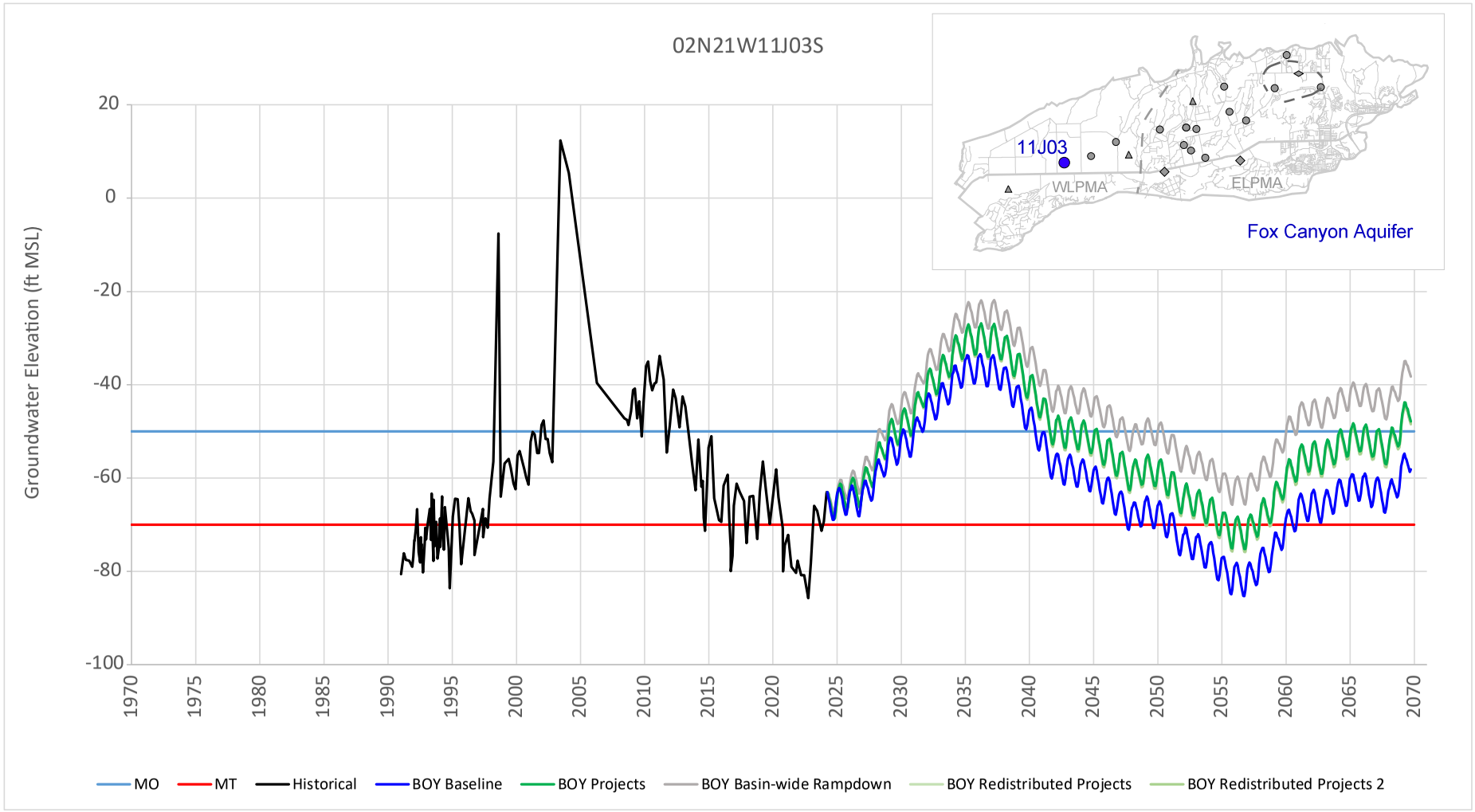
Appendix B
Groundwater Elevation Hydrographs



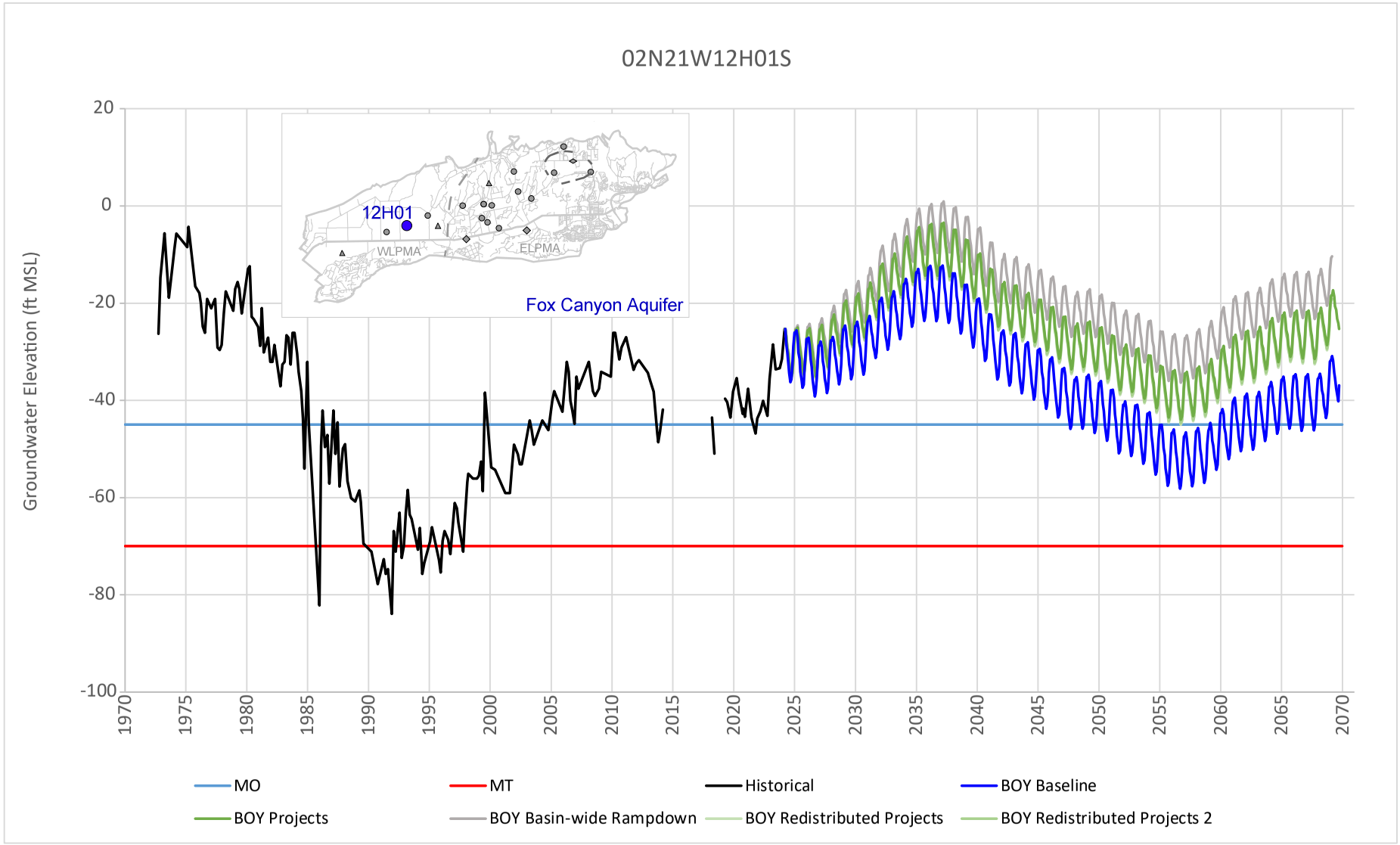
NOTE: The simulated groundwater levels have been shifted so that the initial modeled groundwater elevation is the same as the most recent measured groundwater elevation.



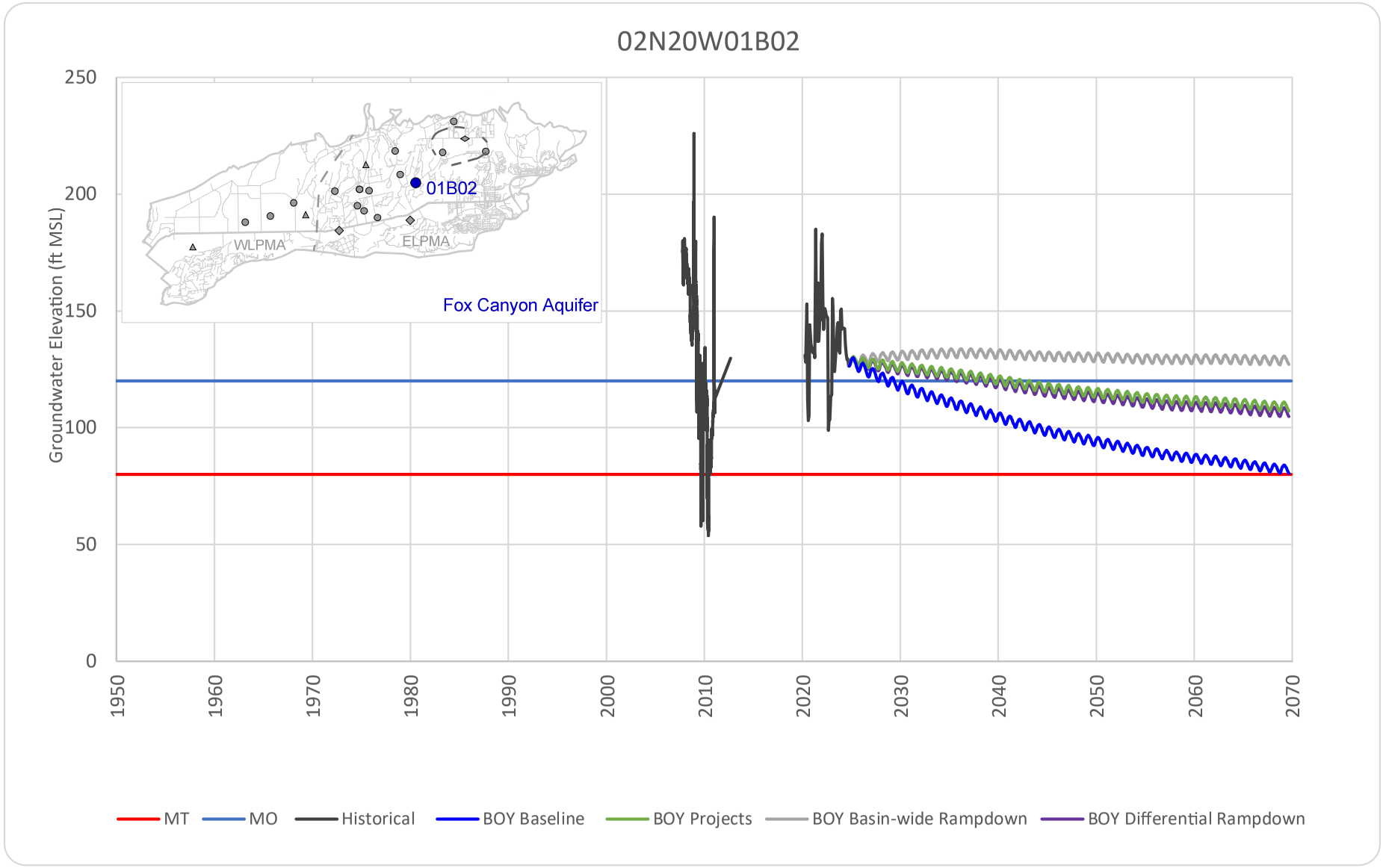
NOTE: The simulated groundwater levels have been shifted so that the initial modeled groundwater elevation is the same as the most recent measured groundwater elevation.



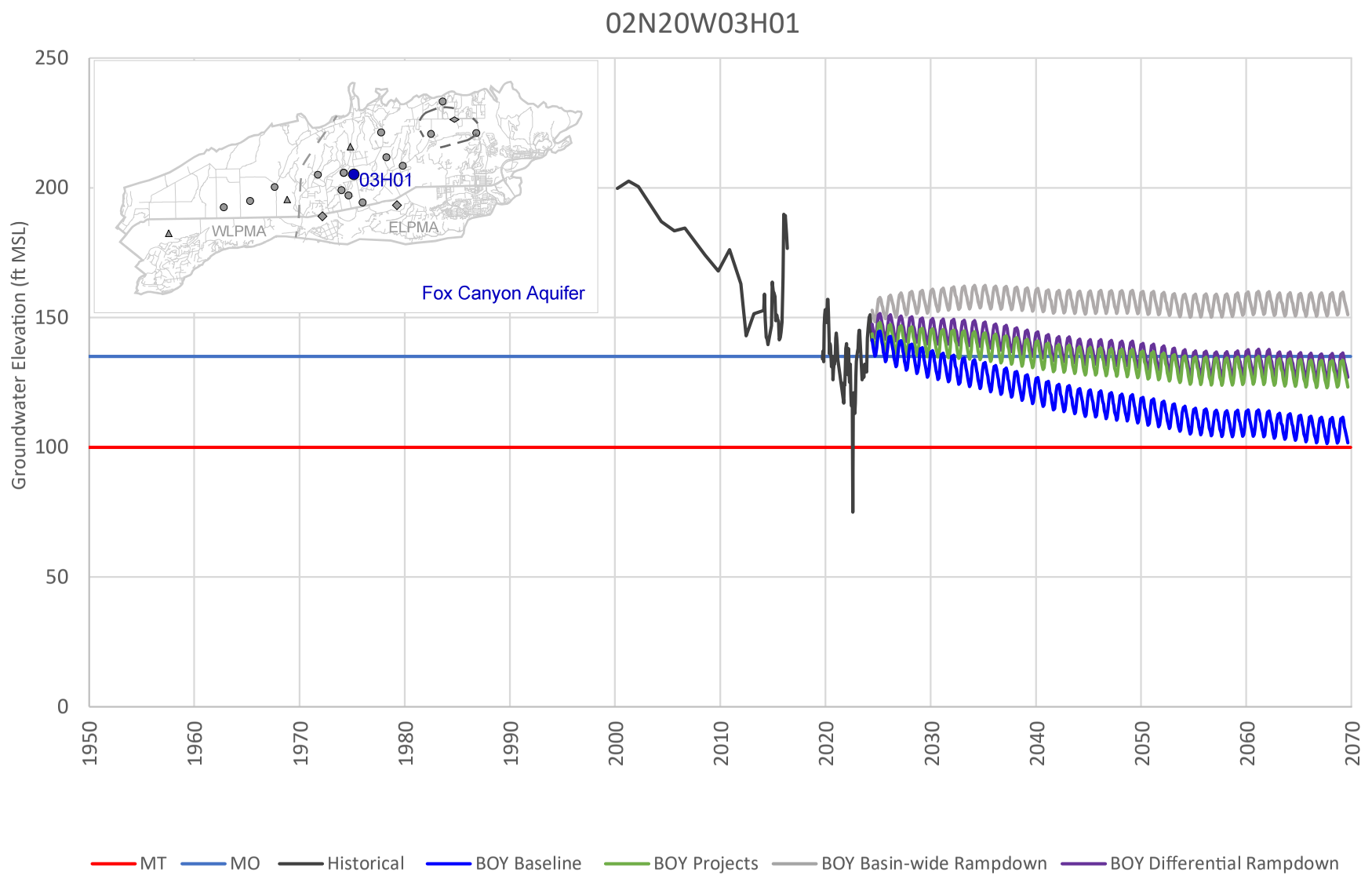
NOTE: The simulated groundwater levels have been shifted so that the initial modeled groundwater elevation is the same as the most recent measured groundwater elevation.



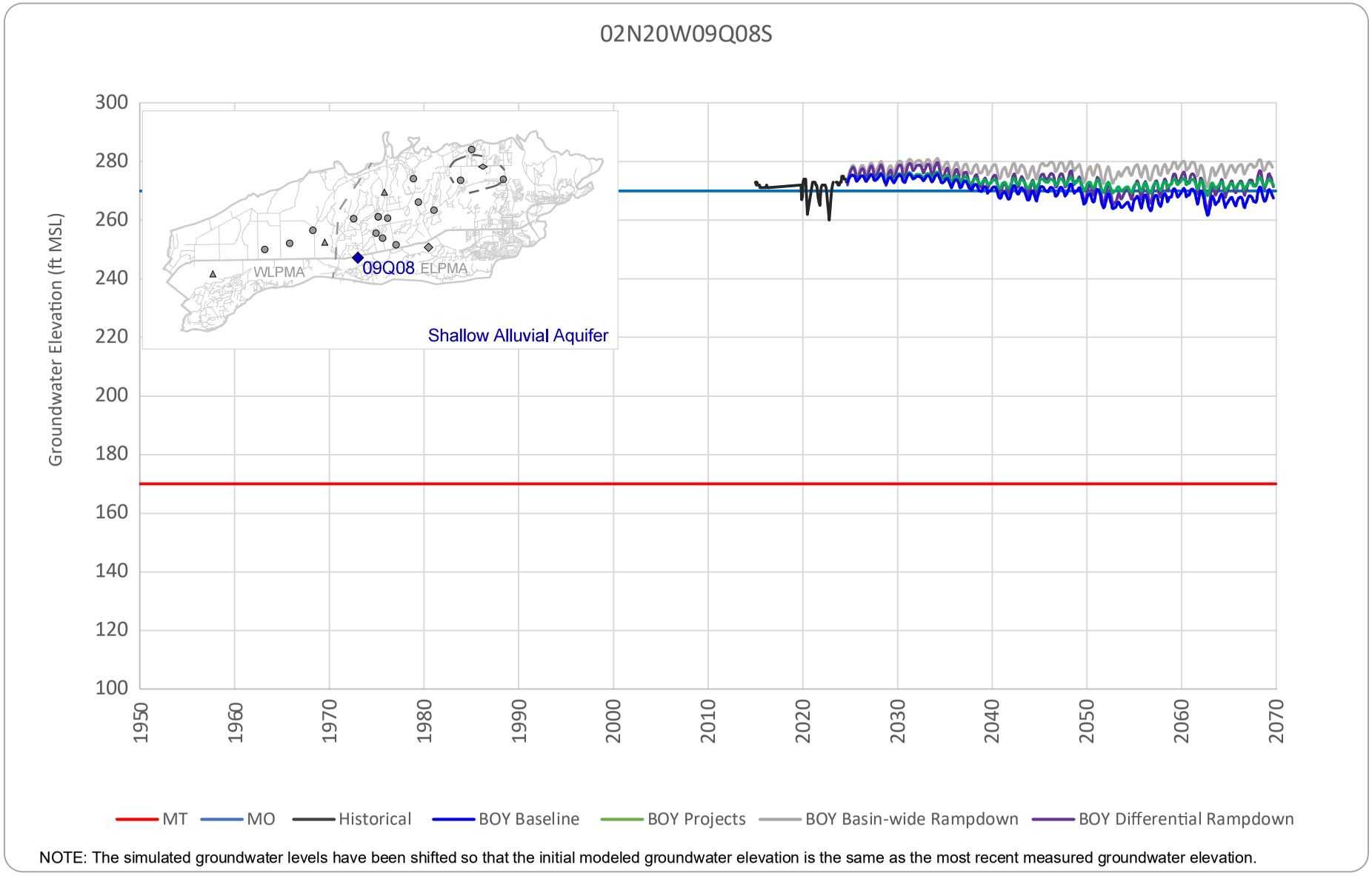
NOTE: The simulated groundwater levels have been shifted so that the initial modeled groundwater elevation is the same as the most recent measured groundwater elevation.



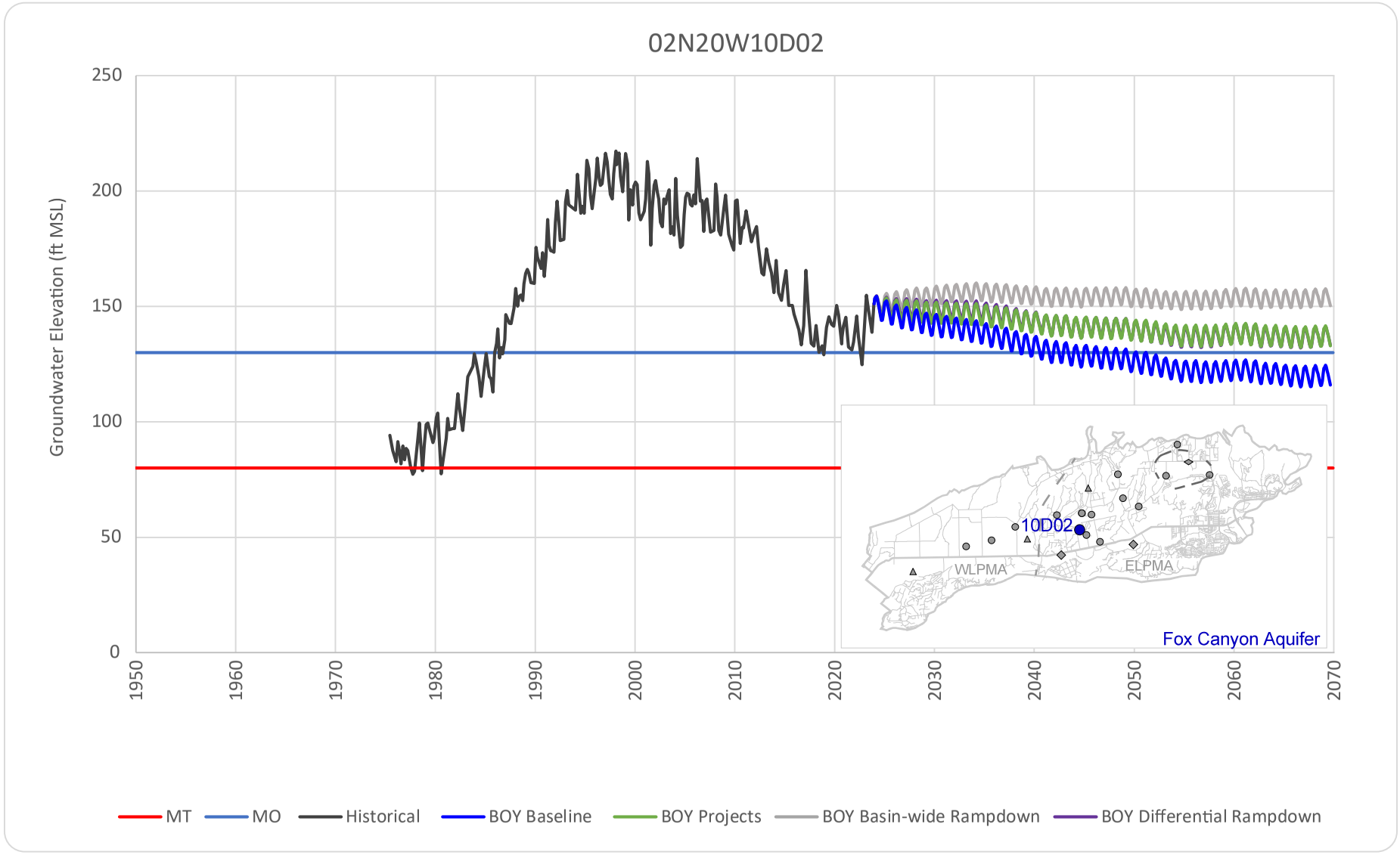
NOTE: The simulated groundwater levels have been shifted so that the initial modeled groundwater elevation is the same as the most recent measured groundwater elevation.



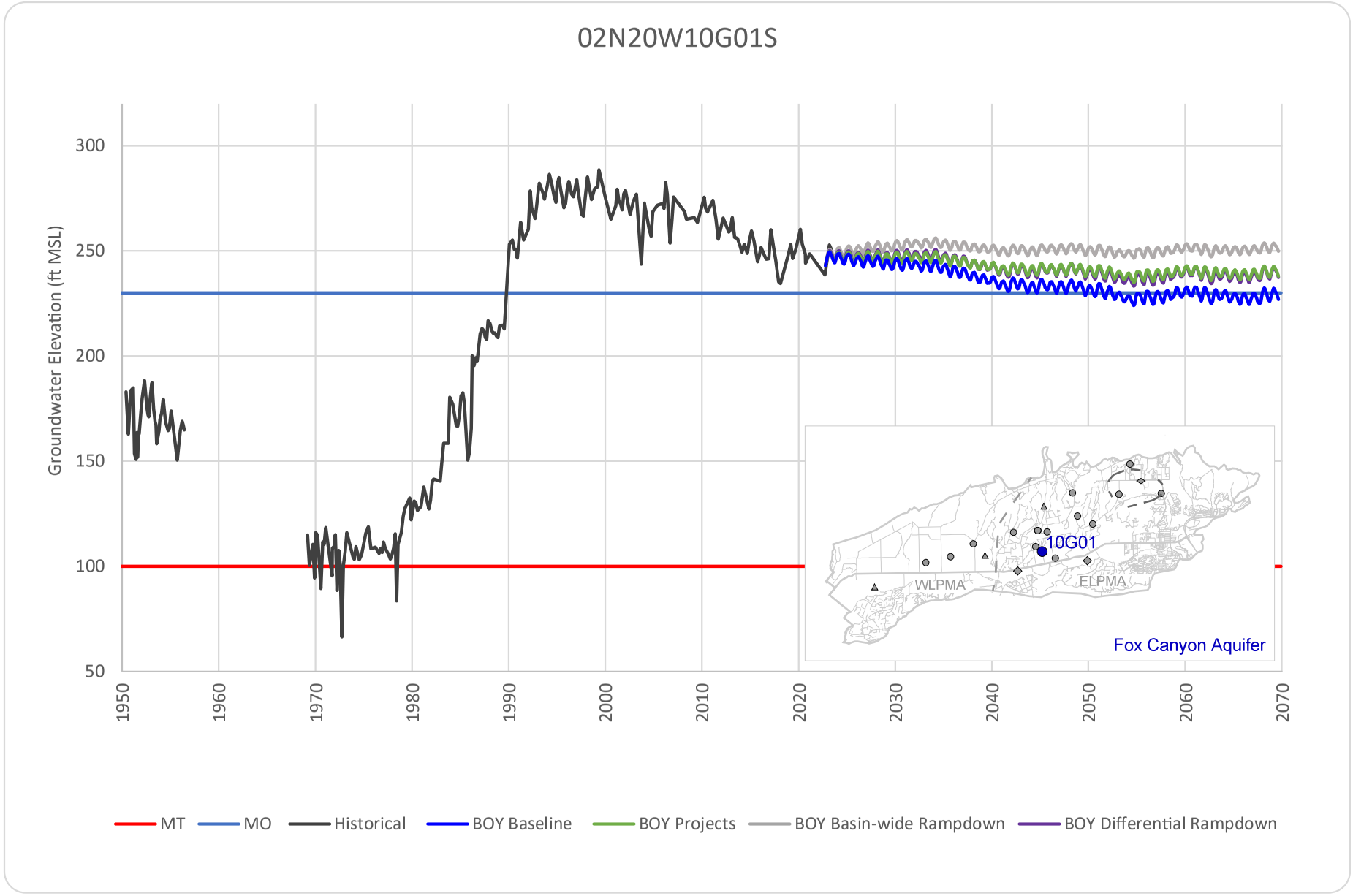
NOTE: The simulated groundwater levels have been shifted so that the initial modeled groundwater elevation is the same as the most recent measured groundwater elevation.

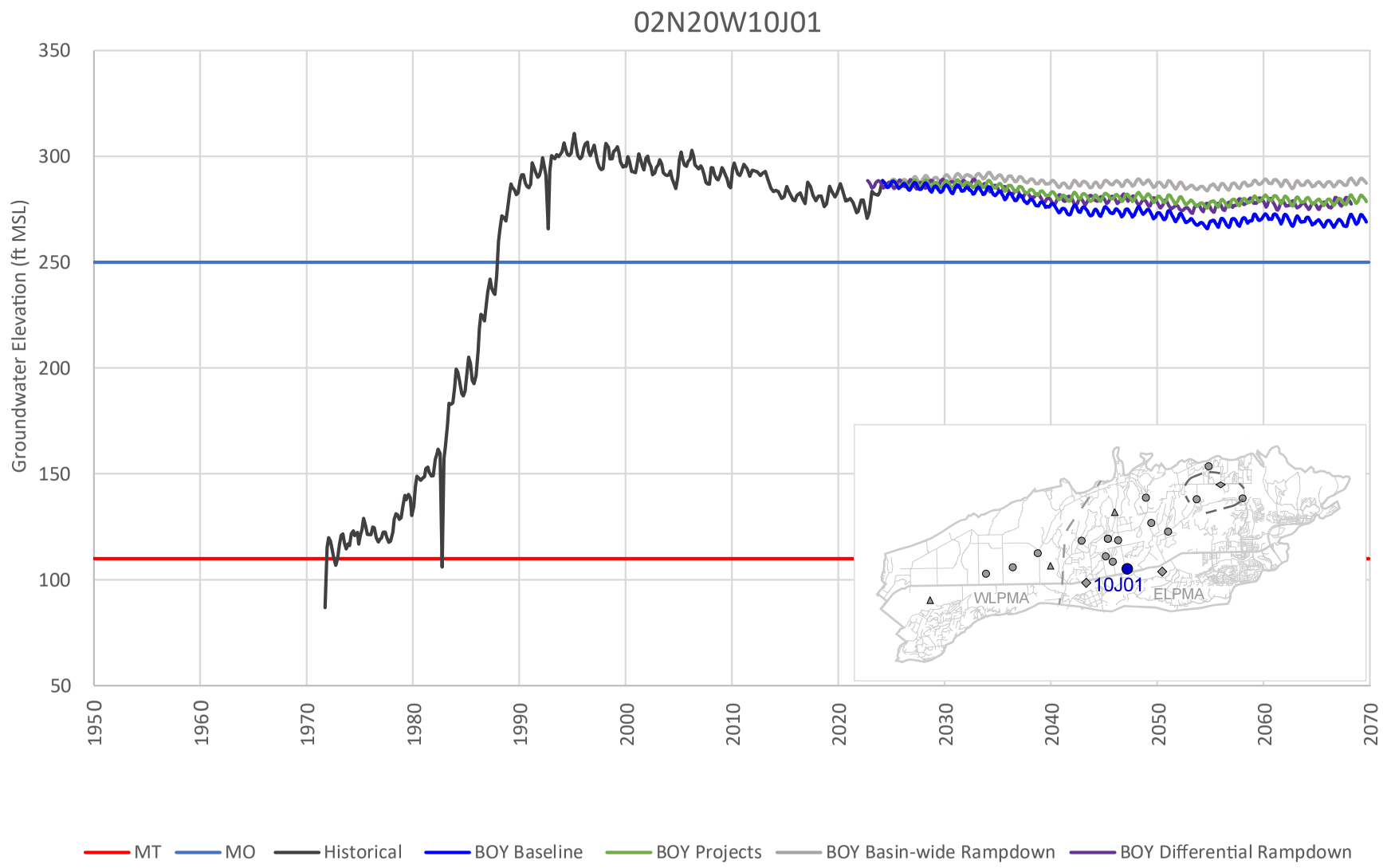


NOTE: The simulated groundwater levels have been shifted so that the initial modeled groundwater elevation is the same as the most recent measured groundwater elevation.

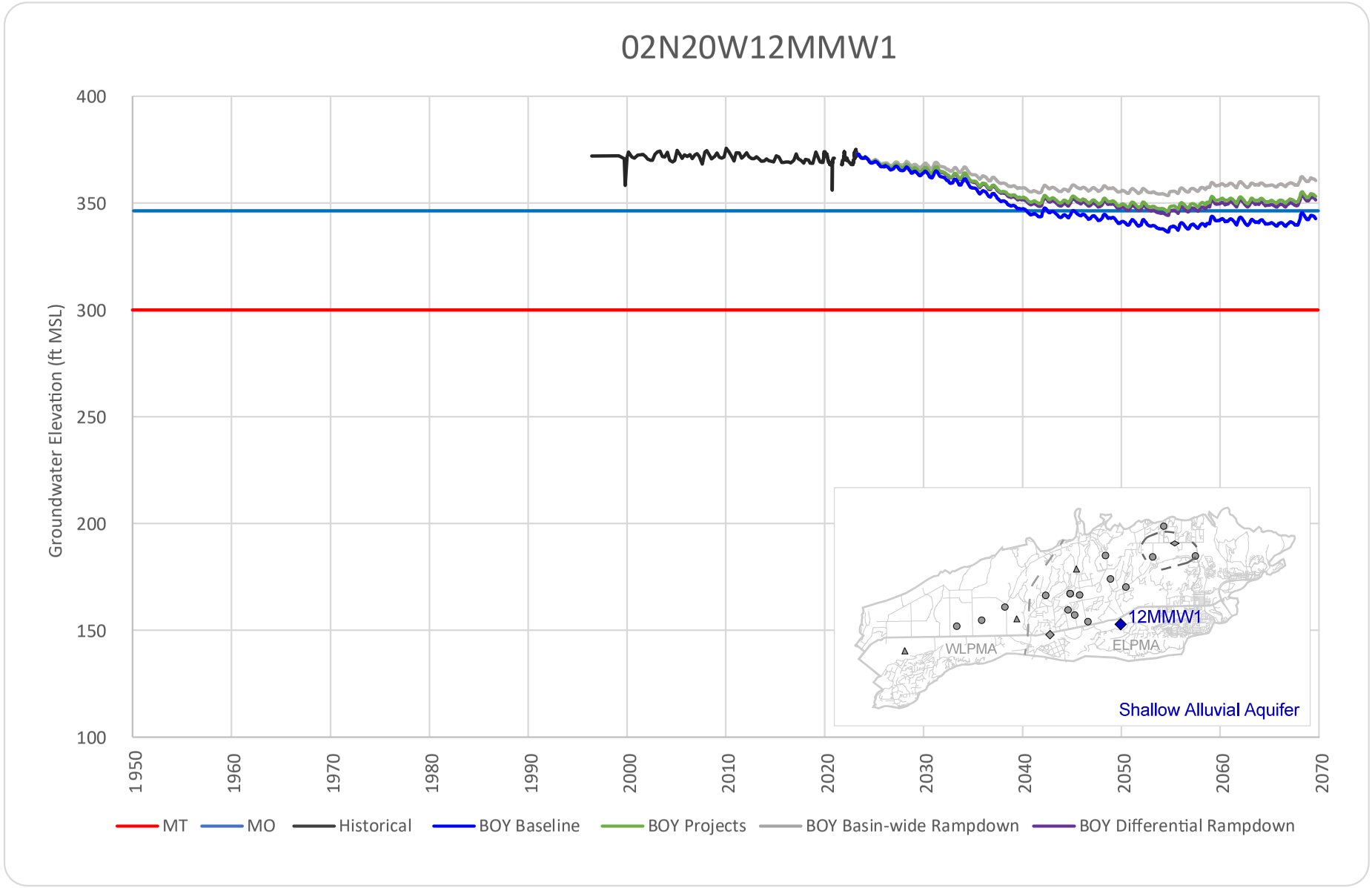


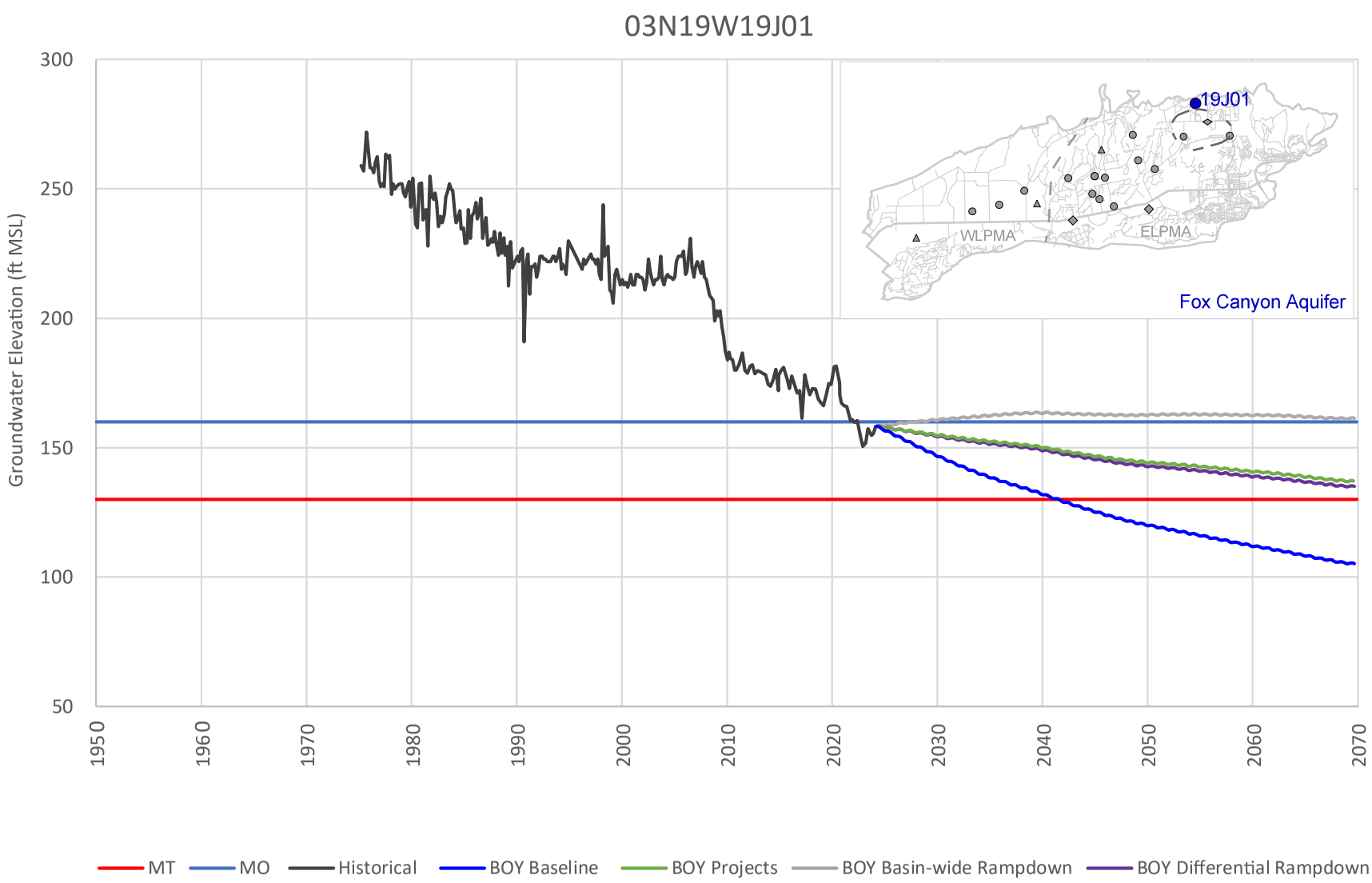
NOTE: The simulated groundwater levels have been shifted so that the initial modeled groundwater elevation is the same as the most recent measured groundwater elevation.



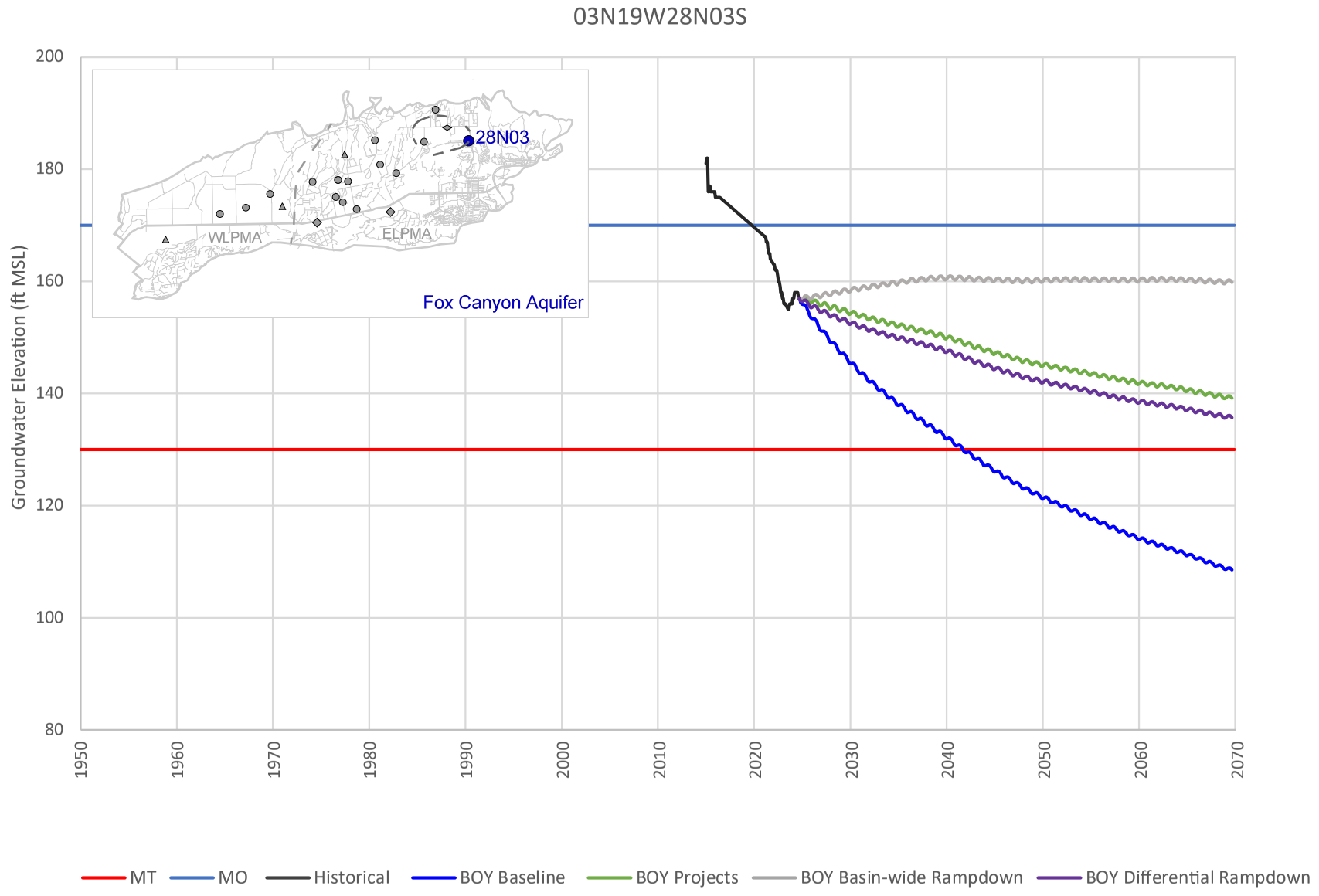


NOTE: The simulated groundwater levels have been shifted so that the initial modeled groundwater elevation is the same as the most recent measured groundwater elevation.

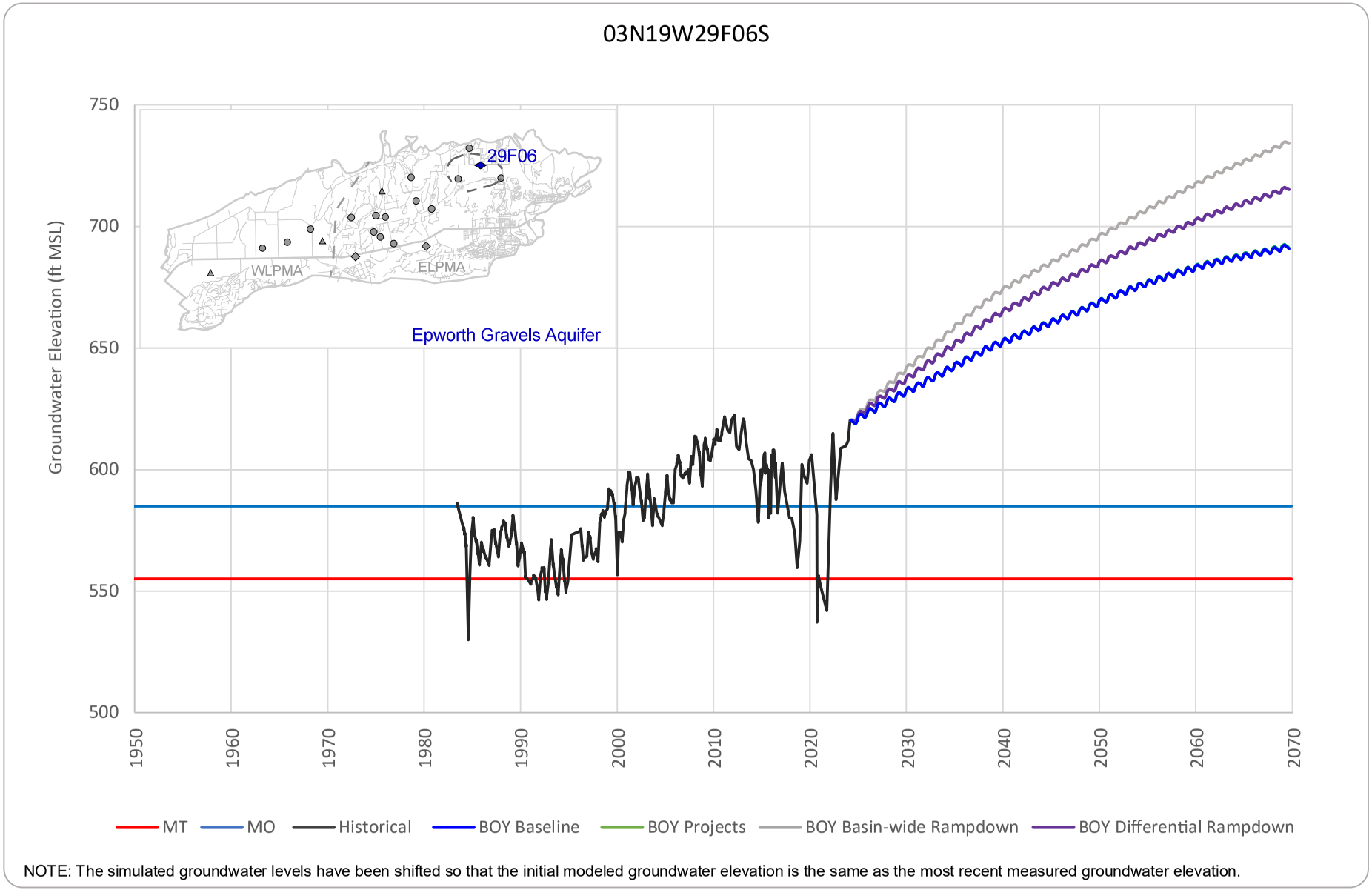




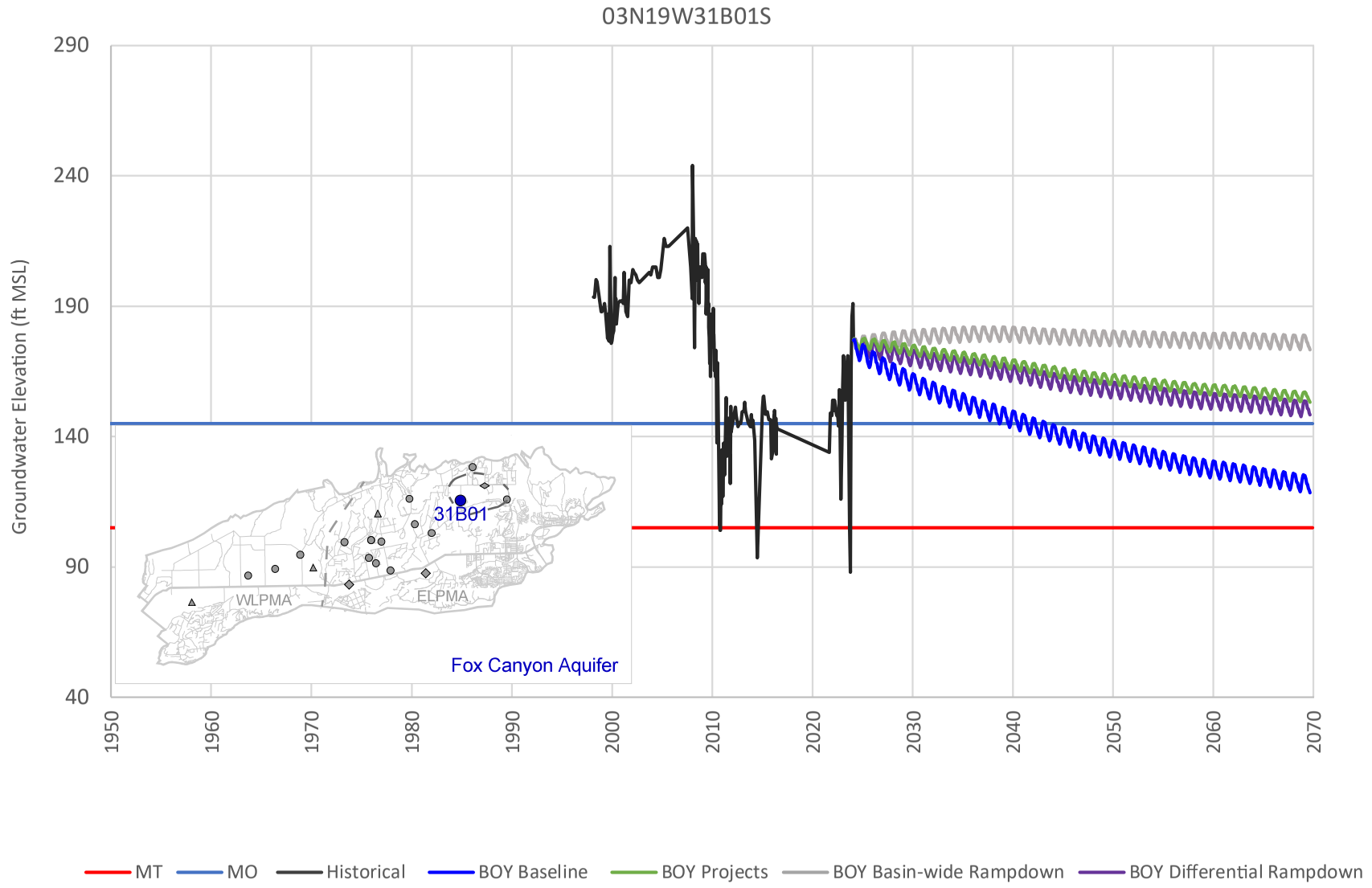
NOTE: The simulated groundwater levels have been shifted so that the initial modeled groundwater elevation is the same as the most recent measured groundwater elevation.



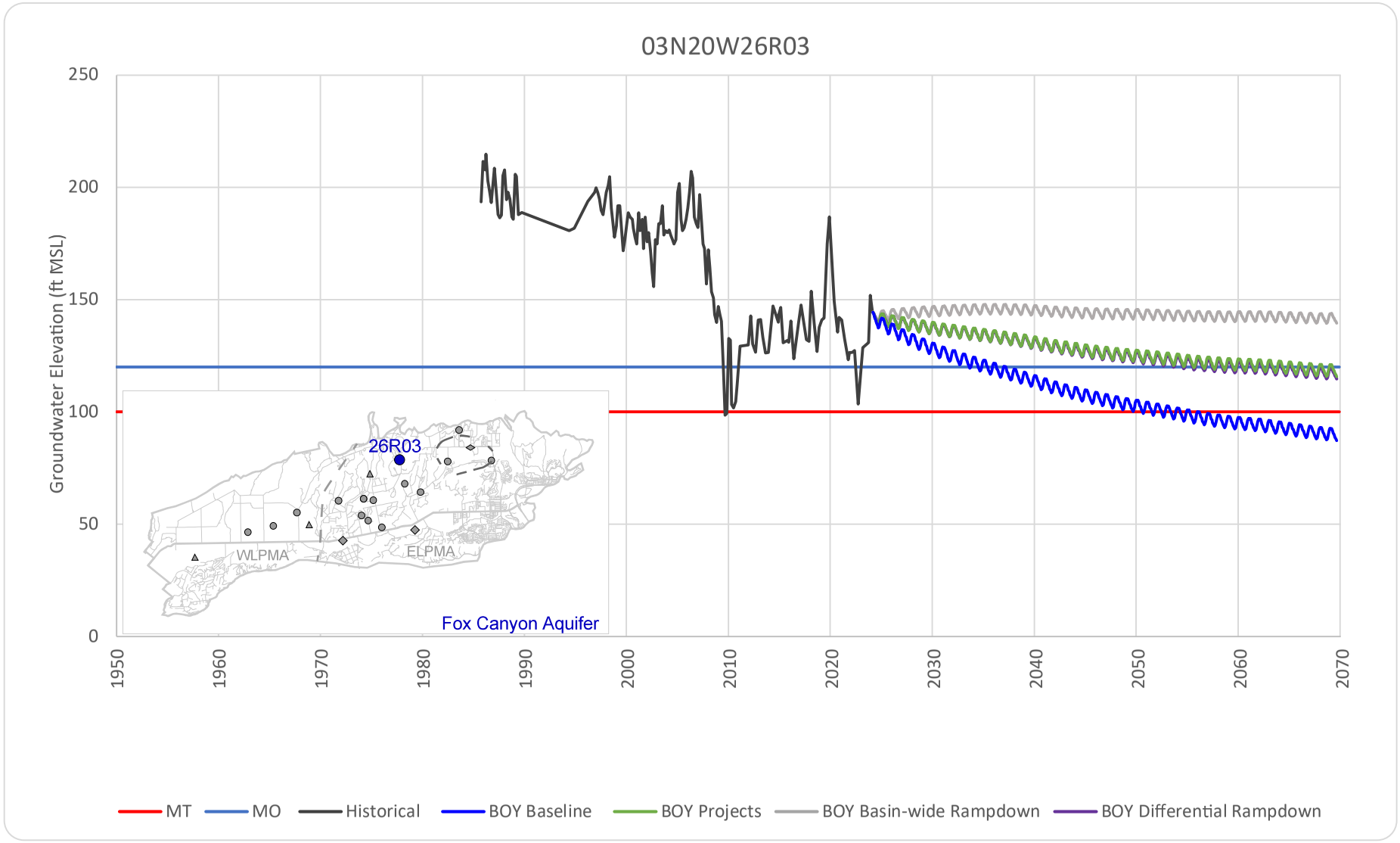
NOTE: The simulated groundwater levels have been shifted so that the initial modeled groundwater elevation is the same as the most recent measured groundwater elevation.



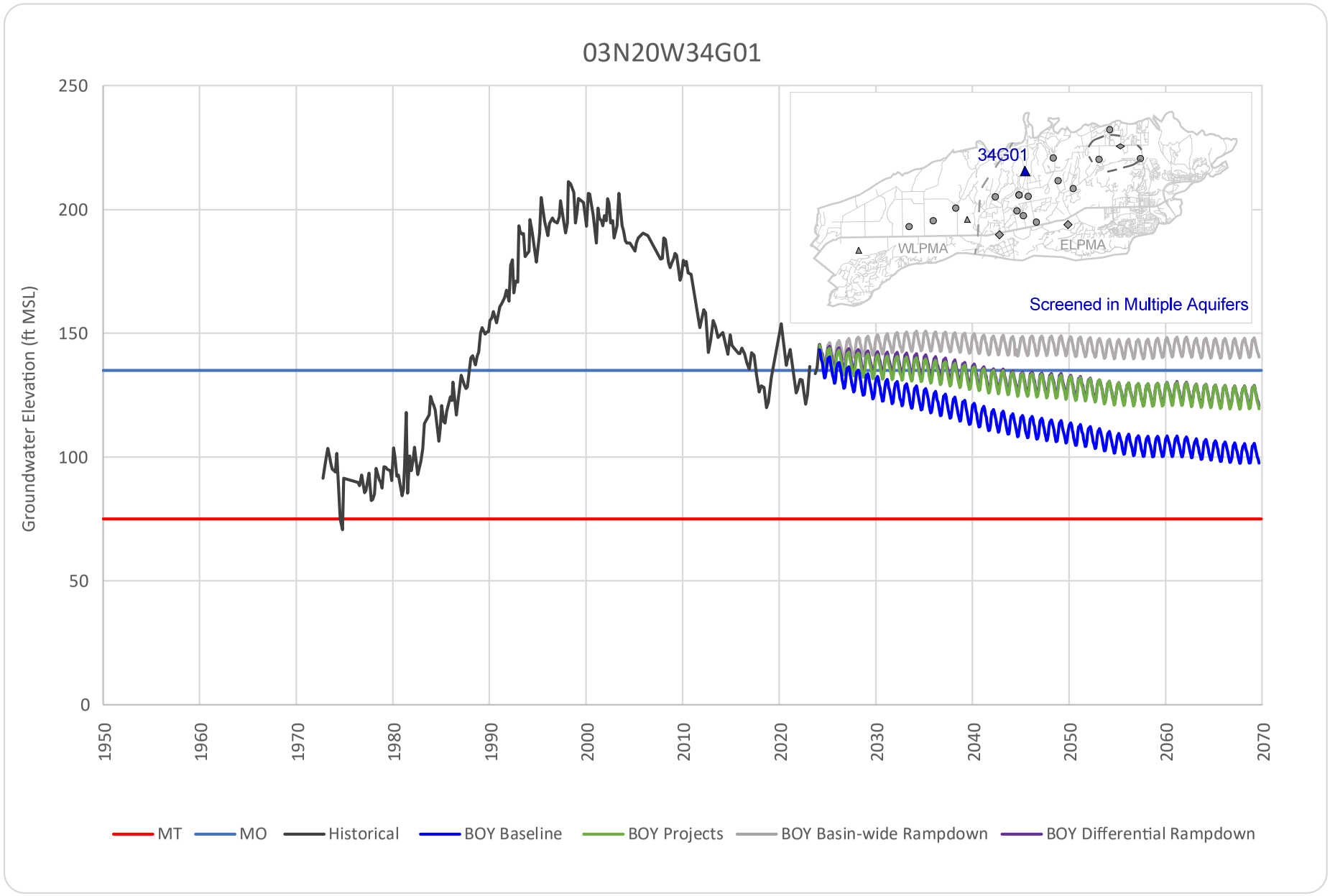
NOTE: The simulated groundwater levels have been shifted so that the initial modeled groundwater elevation is the same as the most recent measured groundwater elevation.

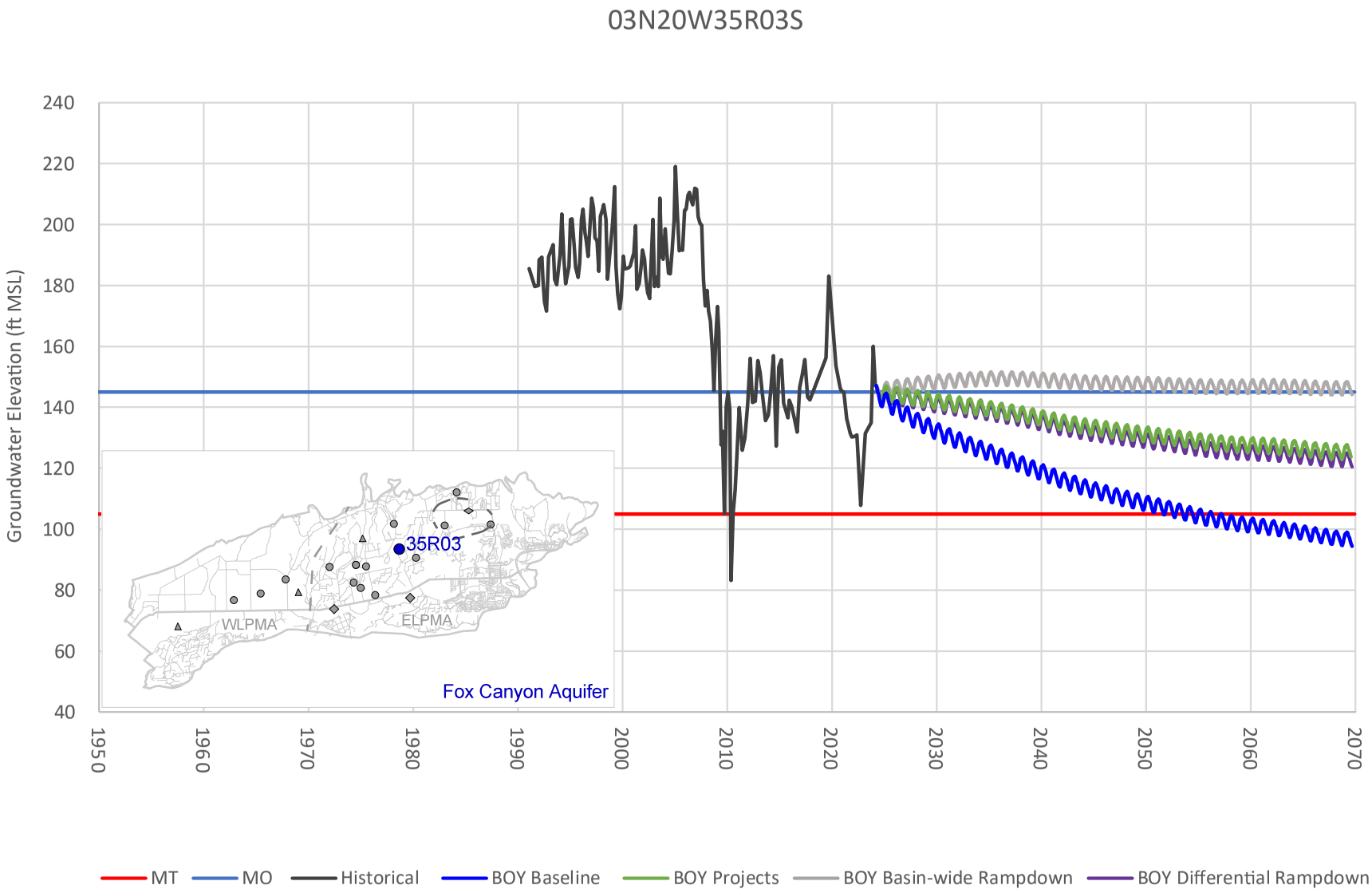


NOTE: The simulated groundwater levels have been shifted so that the initial modeled groundwater elevation is the same as the most recent measured groundwater elevation.

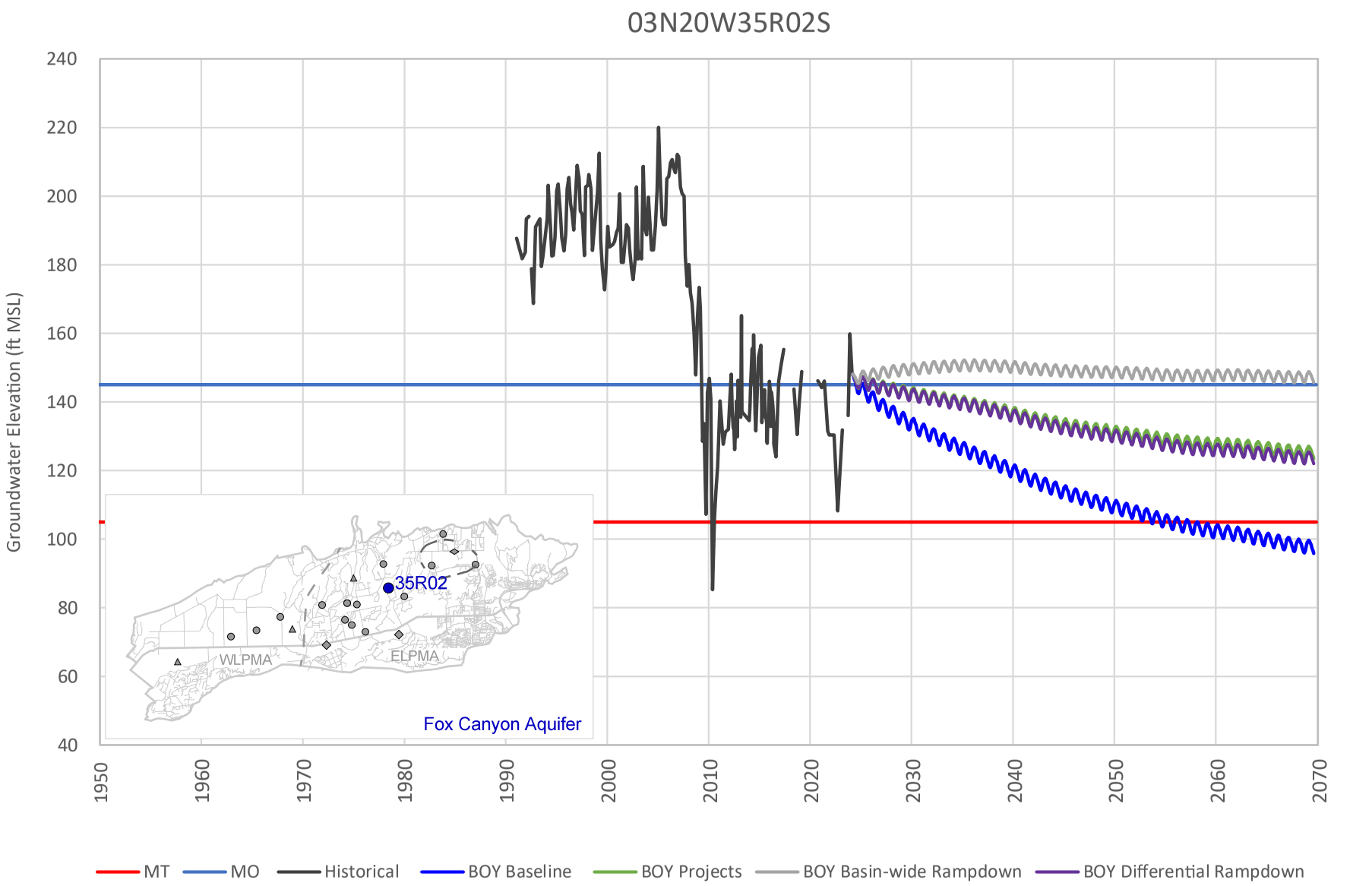


NOTE: The simulated groundwater levels have been shifted so that the initial modeled groundwater elevation is the same as the most recent measured groundwater elevation.





NOTE: The simulated groundwater levels have been shifted so that the initial modeled groundwater elevation is the same as the most recent measured groundwater elevation.



NOTE: The simulated groundwater levels have been shifted so that the initial modeled groundwater elevation is the same as the most recent measured groundwater elevation.

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, Calleguas MWD	X			
John Menne, Zone MWC	X			
Arturo Aseo, Commercial	X			
Rob Grether, West LPV Large Ag	X			
David Schwabauer, East LPV Large Ag	X			
Patty Martinez, East LPV Small Ag				X
Richard Cavaletto, West LPV Small Ag	X			
Laurel Servin, East LPV MWC	X			
Steven Murata, West LPV MWC				X
Paul Chan, VCWWD 1 and 19				X

Report of Bases for Majority and Minority Committee Member Positions:

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.

Specific Comments from the Las Posas Valley Basin Policy Advisory Committee (PAC) - SORTED
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 detaill as possible, including paragraph and line whenever practicle	*Text from document in italics for identification*	Comment with as much detail as possible/necessary.
RC-3	RCavaletto	Misc	Rampdown period	3	1.3	*Rampdown was calculated over a 13-year period*	The Executive Summary says 14 years. Which is correct?
DS-1	DSchwabauer	General Editorial	clarification of purchase or lease of water	8	3.1.3	*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).*	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.
DS-2	DSchwabauer	General Editorial	needed validation on Epworth Gravels	13	3.2.3.1	*In the Epworth Gravels Management Area, simulated groundwater elevations rose throughout the 47-year model time period (Figure 3.5).*	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.
DS-3	DSchwabauer	General Editorial	impacts unknown to date	13	3.2.3.1	*First, not all groundwater producers with wells in the Epworth Gravels Management Area received an allocation in the Judgement (Figure 3-4).*	The full impact of this allocation change is unknown; at this time there has not yet been a ruling by the court.
DS-4	DSchwabauer	General Editorial	validation of the In-lue project	13	3.2.3.1	*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.*	From my perspective, these ending sentences clearly encapsulate the water usage patterns of the Epworth Gravels Management Area. 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.
JM-2	JMenne	General Policy	Postpone Rampdown	15	3.3	*Discussed in entire Section 3.3.*	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-1	JMenne	General Policy	Implement Calleguas In Lieu asap	26	3.1.3	*Discussed in entire Section 3.1.3*	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.
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	*"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."*	The Draft BOYS frequently conflates **reductions in groundwater extraction** with **reductions in Allocations**, creating confusion regarding the legal effect of Rampdown under the Judgment. 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. 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. **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.

Specific Comments from the Las Posas Valley Basin Policy Advisory Committee (PAC) - SORTED
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	*"The Rampdown is the difference between the Initial Operating Yield and this Sustainable Yield."*	The Draft BOYS misdefines and misapplies the Judgment's terms for **Basin Optimization Yield** and **Rampdown**, resulting in incorrect Rampdown magnitudes and Rampdown Rates. 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. 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. 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. **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 not incorporate reasonably anticipated projects.
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	*"The projects rely on other water agencies for implementation… coordination agreements between the agencies have not yet been drafted."*	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. 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. 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. **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.
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	*"If the projects are not implemented, the BOY Study evaluated the Rampdown, and Rampdown rate for the Basin for two scenarios."*	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. 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. **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.

Specific Comments from the Las Posas Valley Basin Policy Advisory Committee (PAC) - SORTED
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	*"The Rampdown Rate, which is the annual reduction in pumping required if the Rampdown is fully implemented by the fall of 2039…"*	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. According to the Water Year 2024 Annual Report, total Basin-wide extractions were approximately**26,805 AF**, and according to the Draft Water Year 2025 Annual Report were approximately**31,122 AF**. Even under conservative assumptions that all WMIDs with incomplete reporting used their full allocations, adjusted extractions remain well below modeled yields: approximately**29,889** AF for WY 2024 and **32,738** AF for WY 2025. 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). 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. **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
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	*"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…"*	The Draft BOYS treats modeled exceedances of Minimum Thresholds (MTs) as determinative of the need for Rampdown, without adequately distinguishing between**modeled threshold exceedances** and the occurrence of actual **Undesirable Results** as defined in the Judgment and SGMA. 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. 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. 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. **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

Specific Comments from the Las Posas Valley Basin Policy Advisory Committee (PAC) - SORTED
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	*"The Rampdown Rate… required if the Rampdown is fully implemented by the fall of 2039…"*	The Draft BOYS overstates the requirement for immediate and linear Rampdown to achieve compliance by 2040. 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 a**calculation framework**, not a mandate that Rampdown must begin immediately or proceed linearly in all circumstances. 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. 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. **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
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	*"In the second scenario, referred to as the Differential Rampdown Scenario, the Rampdown differed by management area."* *"although not specified in the Judgment, this BOY Study considers a Differential Rampdown Scenario…"*	The Draft Basin Optimization Yield Study introduces a "Differential Rampdown" concept that applies non-uniform reductions in groundwater production by Management Area. This approach is**not authorized by the Judgment** and misinterprets **Judgment §4.10.3**. 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. 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**. 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. **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
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.
RC-4	RCavaletto	General Policy	Economic Considerations	NA	NA		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.
RC-1	RCavaletto	Editorial	Number senarios evaluated.	v	Executive Summary	*The scenarios evaluated included. . . scenarios.*	number each of the scenarios to make it easer to follow.

Specific Comments from the Las Posas Valley Basin Policy Advisory Committee (PAC) - SORTED
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
RC-2	RCavaletto	Misc	Rampdown rate	v	Executive Summary	*4th Paragraph.*	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?

LAS POSAS VALLEY WATERMASTER RESPONSE REPORT

Date: March 18, 2026

To: Las Posas Valley Watermaster Board of Directors

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

Re: Response Report to PAC Recommendation Report – Draft Las Posas Valley Basin Optimization Yield Study

The Las Posas Valley (LPV) Watermaster (Watermaster) requested consultation from the LPV Policy Advisory Committee (PAC) on the draft Basin Optimization Yield Study (BOY Study or BOYS). Watermaster's request was transmitted in a December 17, 2025, memorandum to PAC. Watermaster requested two previous TAC consultations regarding the BOY Study which guided preparation of the draft BOY Study:

- December 23, 2024, request for consultation on the BOY Study schedule (January 22, 2025, PAC verbal comments at Watermaster Board meeting)
- April 3, 2025, request for consultation on preferred modeling alternatives and impacts to schedule (May 15, 2025, PAC recommendation report)

The PAC discussed and developed its recommendation report at its January 15, 2026, and February 5, 2026, regular meetings. PAC's February 5, 2026 (received February 24, 2026), recommendation report included four recommendations. Each of these recommendations is listed below followed by Watermaster response. Watermaster appreciates PAC's review of the draft BOY Study and recommendations.

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.

Response to Recommendation 1:
The BOY Study has been revised to clarify that numerical modeling forecasts that Rampdown is unnecessary if Basin Optimization Plan Project 2 (Purchase of Imported Water from CMWD for Basin Replenishment) is fully implemented as scheduled. However, if Project 2 is not fully implemented as scheduled, then Rampdown would be required so that the Operating Yield equals the sustainable yield by fall of 2039. Additionally, the BOY Study finds that if Project 5 (Arroyo Simi-Las Posas Water Acquisition) is not implemented and the City of Simi Valley reduces discharges to the Arroyo Simi, then Rampdown may be required. Ongoing monitoring of the Key Wells will confirm that measured groundwater elevations are consistent with forecasted groundwater elevations simulated by the numerical models to provide assurance that undesirable results will not occur after 2040.

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.

Response to Recommendation 2:
The BOY Study Projects Scenario includes the projects selected for the Basin Optimization Plan that include sufficient information that the project benefits can be quantified for numerical modeling. These are Project 2 (Purchase of Imported Water from CMWD for Basin Replenishment) and Project 5 (Arroyo Simi-Las Posas Water Acquisition). Watermaster is working with CMWD on a fee structure for the purchase of imported water and once finalized will be working with the CMWD and the purveyors on the mechanism for the project. Additionally, Watermaster is working on development of the additional projects selected for the Basin Optimization Plan. These are Project 8 (Allocation Buyback and Reduction Program), Project 7 (In Lieu Deliveries to Northern East Las Posas Feasibility

Study), and Project 9 (Regional Desalter Feasibility Study). Watermaster anticipates that Project 8 will be included numerical modeling forecasts for the next BOY Study, which must be completed by February 1, 2030. Projects 7 and 9 are feasibility studies, the findings of which will inform whether these projects will be included in the 2030 BOY Study. Watermaster is currently soliciting proposals from qualified firms to conduct Project 7. At the same time, given that ELPMA lies completely within CMWD service area and that CMWD has a regional feasibility study similar to Project 9 which requires the same or similar stakeholders, Watermaster is working to collaborate with CMWD on this project. Such collaboration will avoid duplication of work and potentially result in some cost savings.

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

Under the Judgment, Rampdown is a single, basin wide 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.

Response to Recommendation 3:

The Differential Rampdown Scenario was developed and modeled based on a specific Technical Advisory Committee (TAC) recommendation. The term "differential rampdown," as used in the BOYS, refers to localized restrictions on extractions that could be implemented pursuant to Section 4.10.3 of the Judgment to ensure sustainable management and maintain an Operating Yield as close to 40,000 AFY as possible. The scenarios, both Basin-wide and Differential, were modeled to provide both the Watermaster Board and Water Right Holders with an understanding of the reduction in groundwater production that would be necessary to reach sustainable conditions if the projects are not implemented. Decisions regarding Rampdown and localized restrictions, if any, are outside the scope of the BOY Study.

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.

Response to Recommendation 4:
Judgment Section 4.10 clearly states that the BOY Study will establish the Basin Optimization Yield and establish the need for Rampdown, and the Rampdown Rate for the next five years, if the Basin Optimization Yield is less than the initial Operating Yield of 40,000 acre-feet per year. The two numerical models were determined to be the best available tools to establish the Basin Optimization Yield. Watermaster notes that PAC "concurs with Watermaster and Dudek that the alternative providing for the use of the Estimation for the BOY [Basin Optimization Yield] Using the UWCD [United Water Conservation District] Periodic Evaluation Model Files to Run New Scenarios is the most favorable approach" (PAC May 15, 2025, recommendation report).

Watermaster agrees that groundwater elevations measured at Key Wells is the basis for determining if Undesirable Results are occurring in the Basin. PAC is correct that reported groundwater extractions over the first two water years following Judgment implementation have been less than the initial Operating Yield. However, groundwater elevations have been below the minimum thresholds at one or two Key Wells when measured in water years 2024 and 2025 indicating that Undesirable Results are occurring. These wells are in the West Las Posas Management Area of the Basin. In the northern portion of the East Las Posas Management Area of the Basin, groundwater elevations continue to exhibit a long-term non-sustainable decline.

The BOY Study text has been revised to provide clarity that ongoing monitoring of the Key Wells will confirm that measured groundwater elevations are consistent with forecasted groundwater elevations simulated by the numerical models to provide assurance that undesirable results will not occur after 2040. Watermaster will exercise adaptive management based on the findings of ongoing groundwater monitoring. Further, the Basin Optimization Yield will be re-evaluated in 2030 and 2035 BOY Studies, as required by the Judgment. The 2030 BOY Study must be completed by February 1, 2030.

Specific Comments from the Las Posas Valley Basin Policy Advisory Committee (PAC) - SORTED 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	Watermaster Response
CN-1 (commentor initials and comment number)	Commentor Name	General Technical, General Editorial, Technical, Editorial, etc.	Simple description of comment topic	Page number as it appears in document	Section number with as much detaill as possible, including paragraph and line whenever practicle	*Text from document in italics for identification*	Comment with as much detail as possible/necessary.	
RC-3	RCavaletto	Misc	Rampdown period	3	1.3	*Rampdown was calculated over a 13-year period*	The Executive Summary says 14 years. Which is correct?	14 years is correct. Text revised.
DS-1	DSchwabauer	General Editorial	clarification of purchase or lease of water	8	3.1.3	*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).*	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.	The Arroyo Simi-Las Posas Water Acquisition Project is discussed in detail in the Basin Optimization Plan (BOP). The BOYS purpose is to estimate the Basin Optimization Yield based on the projects selected in the BOP. Evaluation of the purchase/lease and costs are beyond the scope of the BOYS.
DS-2	DSchwabauer	General Editorial	needed validation on Epworth Gravels	13	3.2.3.1	*In the Epworth Gravels Management Area, simulated groundwater elevations rose throughout the 47-year model time period (Figure 3.5).*	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.	Commenter is correct regarding historical groundwater levels. The BOYS notes that the projected future groundwater levels simulated by the numerical model are not anticipated to reflect actual conditions in the Epworth Gravels. The text explains the two reasons why the model does not accurately predict future groundwater levels in the Epworth Gravels.
DS-3	DSchwabauer	General Editorial	impacts unknown to date	13	3.2.3.1	*First, not all groundwater producers with wells in the Epworth Gravels Management Area received an allocation in the Judgement (Figure 3-4).*	The full impact of this allocation change is unknown; at this time there has not yet been a ruling by the court.	Comment noted.
DS-4	DSchwabauer	General Editorial	validation of the In-lue project	13	3.2.3.1	*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.*	From my perspective, these ending sentences clearly encapsulate the water usage patterns of the Epworth Gravels Management Area. 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.	Comment noted.
JM-2	JMenne	General Policy	Postpone Rampdown	15	3.3	*Discussed in entire Section 3.3.*	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.	Based on PAC and TAC recommendations, the BOYS has been revised to clarify that modeling indicates that rampdown is not needed if the two projects are implemented as proposed in the BOP.
JM-1	JMenne	General Policy	Implement Calleguas In Lieu asap	26	3.1.3	*Discussed in entire Section 3.1.3*	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.	Watermaster agrees that the in-lieu project should be implemented in a timely manner.
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	*"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."*	The Draft BOYS frequently conflates **reductions in groundwater extraction** with **reductions in Allocations**, creating confusion regarding the legal effect of Rampdown under the Judgment. 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. 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.	Text has been revised to clarify that the "Differential Rampdown" scenario was modeled for informational purposes relevant to Section 4.10.3 of the Judgment. The BOYS is a technical document, and as such, does not provide policy recommendations.

Specific Comments from the Las Posas Valley Basin Policy Advisory Committee (PAC) - SORTED 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	Watermaster Response
							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.	
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	*"The Rampdown is the difference between the Initial Operating Yield and this Sustainable Yield."*	The Draft BOYS misdefines and misapplies the Judgment's terms for **Basin Optimization Yield** and **Rampdown**, resulting in incorrect Rampdown magnitudes and Rampdown Rates. 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. 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. 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. **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 not incorporate reasonably anticipated projects	The Executive Summary has been completely revised. Text discussing rampdown has also been revised in the body text. Definition of Basin Optimization Yield quote the Judgment definition in Section 1.21 and 1.88. Revisions have been made for clarification.
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	*"The projects rely on other water agencies for implementation… coordination agreements between the agencies have not yet been drafted."*	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. 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. 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.	The BOYS text has been revised, and the estimate of Basin Optimization Yield, to be based on the assumption that the two projects selected in the Basin Optimization Plan (BOP) will be implemented as presented in the BOP.

Specific Comments from the Las Posas Valley Basin Policy Advisory Committee (PAC) - SORTED 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	Watermaster Response
							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	
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	*"If the projects are not implemented, the BOY Study evaluated the Rampdown, and Rampdown rate for the Basin for two scenarios."*	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. 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. **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.	Text has been revised throughout to state that if the projects are fully implemented as scheduled, numerical modeling forecasts that Rampdown is unnecessary to maintain a Basin Optimization Yield of 40,000 AFY. Text has been revised in Section 5, Rampdown Rate, that "It should be noted again that the Rampdown calculations in this initial BOY Study, as shown in Table 5-1, are provided for informational purposes for consideration by the Watermaster Board of Directors should the projects not be implemented in a timely manner."
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	*"The Rampdown Rate, which is the annual reduction in pumping required if the Rampdown is fully implemented by the fall of 2039…"*	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. According to the Water Year 2024 Annual Report, total Basin-wide extractions were approximately**26,805 AF**, and according to the Draft Water Year 2025 Annual Report were approximately**31,122 AF**. Even under conservative assumptions that all WMIDs with incomplete reporting used their full allocations, adjusted extractions remain well below modeled yields: approximately**29,889** AF for WY 2024 and **32,738** AF for WY 2025. 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). 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. **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.	Watermaster agrees that there is uncertainty regarding the amount and distribution of extractions in the Basin. When the numerical groundwater modeling was conducted for the BOYS, there was only a single water year of reported extractions available. The Judgment allocations were distributed based on the methodology discussed in section 3.2.2.1. TAC concurred with this methodology. Text has also been revised to identify a further unknown regarding Carryover of unused allocation. Watermaster also agrees with commentor's identification of Basin conditions will drive consideration of the need for rampdown. Text has been revised to clarify that ongoing monitoring of Key Wells will confirm that measured groundwater elevations are consistent with forecasted groundwater elevations simulated by the numerical models and that the Basin Optimization Yield must be re-evaluated in 2030 and 2035, and could be re-evaluated earlier, if necessary.

Specific Comments from the Las Posas Valley Basin Policy Advisory Committee (PAC) - SORTED 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	Watermaster Response
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	*"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…"*	The Draft BOYS treats modeled exceedances of Minimum Thresholds (MTs) as determinative of the need for Rampdown, without adequately distinguishing between**modeled threshold exceedances** and the occurrence of actual **Undesirable Results** as defined in the Judgment and SGMA. 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. 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. 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. **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	California Code of Regulations, Title 23, Division 2, Chapter 1.5, Subchapter 2, defines minimum threshold as a numeric value for each sustainability indicator used to define undesirable results. The Groundwater Sustainability Plan for the Basin established the minimum thresholds that define when undesirable results are occurring in the Basin.
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	*"The Rampdown Rate… required if the Rampdown is fully implemented by the fall of 2039…"*	The Draft BOYS overstates the requirement for immediate and linear Rampdown to achieve compliance by 2040. 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 a**calculation framework**, not a mandate that Rampdown must begin immediately or proceed linearly in all circumstances. 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. 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.	Text has been revised throughout to state that if the projects are fully implemented as scheduled, numerical modeling forecasts that Rampdown is unnecessary to maintain a Basin Optimization Yield of 40,000 AFY. Additionally, text has been revised to clarify that ongoing monitoring of Key Wells will confirm that measured groundwater elevations are consistent with forecasted groundwater elevations simulated by the numerical models and that the Basin Optimization Yield must be re-evaluated in 2030 and 2035, and could be re-evaluated earlier, if necessary.

Specific Comments from the Las Posas Valley Basin Policy Advisory Committee (PAC) - SORTED 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	Watermaster Response
							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	
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	*"In the second scenario, referred to as the Differential Rampdown Scenario, the Rampdown differed by management area."* *"although not specified in the Judgment, this BOY Study considers a Differential Rampdown Scenario…"*	The Draft Basin Optimization Yield Study introduces a "Differential Rampdown" concept that applies non- uniform reductions in groundwater production by Management Area. This approach is**not authorized by the Judgment** and misinterprets **Judgment §4.10.3**. 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. 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**. 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. **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	Please see response to RG-2.
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.	Comment noted.
RC-4	RCavaletto	General Policy	Economic Considerations	NA	NA		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.	Comment noted.
RC-1	RCavaletto	Editorial	Number senarios evaluated.	v	Executive Summary	*The scenarios evaluated included. . . scenarios.*	number each of the scenarios to make it easer to follow.	Text has been extensively rewritten for clarity rendering the need for scenario numbering unnecessary.

Specific Comments from the Las Posas Valley Basin Policy Advisory Committee (PAC) - SORTED 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	Watermaster Response
RC-2	RCavaletto	Misc	Rampdown rate	v	Executive Summary	*4th Paragraph.*	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?	The BOYS is a technical document to provide the Watermaster Board with the technical basis for consideration of policy including consideration of implementation of rampdown. The modeling scenarios did not evaluate how long the projects need to be active before 2039 to provide assurance of a 40,000 AFY Operating Yield in 2040. However, ongoing groundwater monitoring at the Key Wells will be compared with the projected groundwater elevations simulated by the numerical model and be used to evaluate whether undesirable results are occurring and the need for rampdown.

LAS POSAS VALLEY TECHNICAL ADVISORY COMMITTEE

February 3, 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 – Las Posas Valley Basin, Draft Basin Optimization Yield Study Report

The Las Posas Valley Watermaster Technical Advisory Committee (TAC) provides this Recommendation Report regarding the draft Basin Optimization Yield Study in response to a committee consultation request transmitted to the TAC on December 17, 2025 by Las Posas Valley Basin Watermaster (Watermaster) staff.

BACKGROUND

The Las Posas Valley Adjudication judgment requires preparation of a Basin Optimization Yield (BOY) Study to evaluate Basin Optimization Yield, set the Operating Yield, and calculate the pumping rampdown to achieve sustainable groundwater management by 2040. A draft of the Las Posas Valley Basin Optimization Yield Study was provided to the TAC for review. This followed previous TAC review of preliminary model scenario results for the simulations included in the BOY Study in the summer of 2025. TAC prepared and submitted a Recommendation Report presenting comments and recommendations on the preliminary model scenario results on September 16, 2025. In preparation of the draft BOY Study, the Watermaster considered and incorporated comments and recommendations the TAC provided after reviewing the preliminary model scenario results.

The draft BOY Study follows coordination and consultation between the Watermaster, Dudek, and the TAC regarding the methods for assessing basin yield and initial results of those assessments. The Watermaster requested TAC recommendations or comments on the draft and the TAC discussed and reviewed the draft BOY Study in meetings on January 6 and 20, 2026. TAC comments and recommendations following review of the draft BOY Study are summarized in this Recommendation Report. Detailed TAC comments and editorial suggestions are also attached in tabular format organized by TAC member, comment type and topic, and draft BOY Study page and section to provide additional information and assist the Watermaster in tracking and responding to comments.

The draft BOY Study represents a significant effort on the part of the Watermaster and their groundwater consultant, Dudek. The TAC appreciates the considerate approach both parties have taken in analyzing optimized yield in the Las Posas Valley Basin (LPVB) and presenting a thorough report summarizing the work.

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

TAC RECOMMENDATIONS

1. RECOMMENDATION 1: CLARIFY HOW THE ARROYO SIMI-LAS POSAS WATER ACQUISITION PROJECT WAS SIMULATED IN THE MODEL SCENARIOS

It is unclear how the Arroyo Simi-Las Posas water acquisition project (Basin Optimization Plan Project 5) was included in the various simulations. Please clarify in text and add a simple table that lists the amount of surface water that was simulated to enter the LPVB for each simulation. This is particularly important for the rampdown scenarios, which are described as being no-project scenarios. If they are no-project scenarios, please clarify that the current flows in the Arroyo Simi-Las Posas that Basin Optimization Plan Project 5 are intended to maintain were not included.

1.1 Recommendations:

Clarify and document how surface water flows were adjusted between scenarios to include or exclude the Arroyo Simi-Las Posas water acquisition project.

1.2 Technical Rationale for Recommendation:

The Arroyo Simi-Las Posas water acquisition project is designed to maintain recent historical surface water flow into the LPVB. If the no-project rampdown scenarios do not include the contribution to the water budget from the project, that should be clearly stated in the BOY Study.

1.3 Summary of Facts in Support of Recommendation:

- The Arroyo Simi-Las Posas water acquisition project (Basin Optimization Plan Project 5) has been described as a means of maintaining current and recent historical surface water flow into the LPVB.
- If maintenance of this surface water inflow is dependent on the project, then it should not be included in the no-project rampdown scenario simulations.

2. RECOMMENDATION 2: PRESENT BASIN OPTIMIZATION YIELD AND RAMPDOWN CONSISTENT WITH JUDGEMENT

The Judgment defines Basin Optimization Yield as the estimated yield projected to be available to achieve sustainable groundwater management by 2040 and rampdown as the deficit between the effective Operating Yield and the Basin Optimization Yield. The draft BOY Study references these definitions and identifies the Basin Optimization Yield as a

groundwater production rate of 36,860 acre-feet per year (AFY), which includes implementation of Basin Optimization Projects and maintains sustainable groundwater conditions. However, the draft BOY Study then uses a different annual production rate to identify and define rampdown and rampdown rate. According to the Judgment, rampdown would therefore be 40,000 AFY minus 36,860 AFY, which is 3,140 AFY (current Operating Yield is 40,000 AFY and BOY Study calculated Basin Optimization Yield is 36,860 AFY).

This may point to a conflict within the Judgement. The reduction in pumping below the Operational Yield identified in the draft BOY Study as the Basin Optimization Yield applies only to those LPVB groundwater users who would receive project in lieu water deliveries. However, the Judgment requires rampdown to be applied to all groundwater users in the LPVB. The Judgment does not appear to contemplate a condition in which a no-project scenario results in rampdown, which is the context in which rampdown has been discussed and estimated in the draft BOY Study.

2.1 Additionally the Judgment requires that the Basin Optimization Yield be used by the Watermaster to allocate pumping to pumpers. If the Basin Optimization Yield identified in the BOY Study is used for this purpose, pumpers will not receive the correct annual allocations; it will be reduced by the volume of in lieu water delivered to the projects assessed in the BOY Study. Because the in lieu projects in the BOY Study offset some groundwater use, the volume of water delivered for in lieu use should be included in the Basin Optimization Yield. Recommendations:

- Clarify how the Basin Optimization Yield with the in lieu projects will be used for future allocation determinations, and rampdown (which is assumed to be zero so long as projects are implemented).
- Explore and characterize how rampdown is being presented in the BOY Study in contrast to the definitions in the Judgment.
- Provide additional explanation for the context of including a no-project scenario and associated rampdown in the BOY Study. To avoid confusion, this explanation should differentiate between pumping reductions in the BOY Study and rampdown in the Judgment. This explanation should also inform the reader that uniform and differential pumping reductions are both presented for informational purposes only.

2.2 Technical Rationale for Recommendation:

The Judgment and the draft BOY Study appear to address rampdown differently, as discussed above. The BOY Study should accurately describe these differences and discuss how the Basin Optimization Yield will be used to determine future allocations. Without this clarification, and in strict compliance with the Judgment, there may be confusion regarding the basis for allocations. The no-project pumping reduction in the BOY Study should also be modified so that its difference from rampdown as defined and described in the Judgment.

2.3 Summary of Facts in Support of Recommendation:

- The Judgment includes the following definitions:
    - Basin Optimization Yield is the estimated yield projected to be available to achieve sustainable groundwater management by 2040.

    - Rampdown is the deficit between the effective Operating Yield and the Basin Optimization Yield.
- The draft BOY Study references these definitions, however:
    - The Basin Optimization Yield is identified a groundwater production rate of 36,860 AFY, implying that this is the value that would be used to determine future allocations.
    - No-project pumping reductions are identified using an approach that differs from the definition in the Judgment.

3. RECOMMENDATION 3: CONSIDER ADDRESSING THE EFFECTS OF THE SOMIS FAULT MODEL BOUNDARY CONDITION ON IN LIEU AND RAMPDOWN SIMULATIONS

As noted in the draft BOY Study and raised by the TAC in previous recommendation reports, the Coastal Plain Model includes a boundary condition on the Somis fault that is inconsistent with the agreed-upon hydrogeologic conceptual model of the LPVB, the boundary condition in the East Las Posas Model, and the version of the Ventura Regional Groundwater Flow Model (VRGFM) that was used to develop the LPVB GSP. While the draft BOY Study indicates that the simulated in lieu and rampdown scenarios for the WLPMA are sustainable despite this issue with the Coastal Plain Model, it is possible that the volumes of water identified for in lieu delivery and reduced pumping in the projects and rampdown scenarios, respectively, exceed what would actually be required to achieve sustainable groundwater conditions in the WLPMA.

3.1 Recommendations:

Consider estimating the volumetric effect the inconsistent boundary condition has on the project and rampdown scenario simulations. This could allow the in lieu and rampdown volumes to be refined downward, reducing costs and impacts to WLPMA groundwater users.

3.2 Technical Rationale for Recommendation:

The Coastal Plain model boundary condition at the Somis fault is inconsistent with the agreed upon hydrogeologic conceptualization and observed conditions in the eastern portion of the WLMPA. As a result the Coastal Plain model simulates flow leaving the WLPMA when groundwater elevations in the eastern part of the management area rise in response to the simulated project and rampdown changes to the local water budget. An analysis of the volume of water that leaves the management area could show how much the in lieu project and rampdown scenarios overestimate pumping reductions, thereby allowing for reduced in lieu water delivery and rampdown requirements.

3.3 Summary of Facts in Support of Recommendation:

- The Coastal Plain model boundary condition at the Somis fault is not consistent with the agreed-upon hydrogeologic conceptual model.

- Increased groundwater elevations resulting from reduced pumping in project and rampdown scenarios causes the model to simulate groundwater flow out of the WLMPA across the Somis fault.
- In practice, the groundwater that leaves the WLPMA in the model would remain in the management area increasing water levels above what is simulated in the scenarios presented in the draft BOY Study.
- This outflow implies that the in lieu delivery and rampdown pumping reduction volumes identified in the draft BOY Study could be reduced.

4. RECOMMENDATION 4: CLARIFY EXISTING AND PROJECTED CONDITIONS IN THE EPWORTH GRAVELS MANAGEMENT AREA

The information presented for the Epworth Gravels Management Area (EGMA) should be expanded to explain several factors. These include the presence of groundwater producers without allocations in the Judgment, the effects of recent pumping patterns on model simulations, and the need for rampdown in the management area if the Basin Optimization Plan projects are not implemented.

4.1 Recommendations:

- In section 3.2.3.1:
  - Provide more information and quantify or estimate how much pumping in the EGMA is not accounted for in the distribution of allocations in the Judgment.
  - Provide similar information for the other management areas or note the absence of pumpers without allocations in those management areas.
- Provide additional information regarding the effects of using water year 2024 pumping in the EGMA for the 47-year model period and how this will be accounted for in the Operating Yield for the management area and LPVB.
- Explain why the difference between the estimated sustainable yield and rampdown volumes were so large for the EGMA.
- Explain why EGMA pumping is reduced in the rampdown scenarios when the baseline production rate for the management area is already lower than the sustainable yield, as indicated on page 13 of the draft BOY Study.
- Provide additional discussion of the differential rampdown scenario results in the EGMA, specifically addressing continuing declines in groundwater levels shown on Figure 3-13.

4.2 Technical Rationale for Recommendation:

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

4.3 Summary of Facts in Support of Recommendation:

A summary of facts for this recommendation is not applicable.

5. RECOMMENDATION 5: CLARIFY HOW PUMPING AND WATER BUDGET CHANGES WERE APPLIED IN MODEL SCENARIOS, SPECIFICALLY WITH RESPECT TO TEMPORAL VARIABILITY IN PUMPING VOLUME AND DISTRIBUTION

It is not clear from the descriptions of model scenarios if pumping was held constant for every year of the simulation period for each scenario, or if pumping volume and/or distribution were varied during the simulation period.

While this comment and recommendation applies to all model simulations, it is particularly important for the rampdown scenarios. It is unclear whether pumping at the fully reduced rate was used for the entire rampdown simulation period or if pumping was reduced incrementally each year. If it is the former, the TAC questions whether rampdown will be effective in achieving sustainable groundwater conditions by 2040. As presented in the BOY Study, the model scenarios indicate that over the 47-year model period the annual groundwater production volumes pumped in the rampdown scenarios will achieve sustainability. However, the BOY Study does not appear to assess how long after reaching the rampdown pumping rate it will take for water levels to rise to the thresholds identified as sustainable. Prolonged pumping at rates in excess of the rampdown rate may result in water levels below the minimum thresholds in representative monitoring wells and it is not clear that one year of pumping at the rampdown rate at the end of the 14-year rampdown period will be sufficient to facilitate water level recovery.

5.1 Recommendations:

- Clarify how pumping and other water budget changes were applied in model scenarios, especially as it relates to rampdown rate implementation over time during the model period.
- Assuming the rampdown was assumed to have occurred before the start of each scenario and pumping during the entire model period was equal to the rampdown rate for the scenario, explain how long water level recovery to sustainable conditions may take after rampdown is complete.

5.2 Technical Rationale for Recommendation:

The BOY Study presents rampdown scenario model results that appear to have assumed pumping over the entire 47-year model period at the reduced rampdown rate that will only be achieved after a period of progressive pumping reduction according to a rampdown rate schedule. These simulations do not appear to show how long it will take water levels in the LPVB to respond once rampdown is completed and as defined in the Judgment and BOY Study that would not occur until 2040.

5.3 Summary of Facts in Support of Recommendation:

- Modeling over a long period at a reduced pumping rate will show higher water levels than can be achieved by prolonged pumping at higher rates.
- The 14-year rampdown period includes linear reduction in groundwater pumping every year.

- Rampdown model scenarios appear to have assumed pumping would be constant every year during the 47-year model period.
- Water levels are likely to take time to rise once rampdown is complete.

6. RECOMMENDATION 6: CLEARLY IDENTIFY ASSUMPTIONS ASSOCIATED WITH MODELING AND OTHER ANALYSES IN THE BOY STUDY

The TAC review identified some unstated assumptions in the modeling approach that should be included in the BOY Study. These include the assumption that modeled hydrology from the beginning of water year 2023 and current is consistent with actual conditions and that water in storage credited to Calleguas Municipal Water District will remain in storage. There may be other assumptions that are implicit in the modeling and other analyses in the BOY Study and these should be clearly identified and discussed in a dedicated section of the report.

6.1 Recommendations:

Clearly describe and explain the implications of assumptions in the modeling and other analyses in the BOY Study, including but not limited to the following:

- The difference between modeled and actual hydrology for the period from beginning of water year 2023 (October 2022) through the end of water year 2025 (September 2025) and briefly describe (qualitatively) the impact on interpretation of model results.
- The potential effects of recovery of water stored by Calleguas Municipal Water District on water levels, water budgets, and sustainable groundwater conditions.

6.2 Technical Rationale for Recommendation:

It is important for reports that include complex analysis to include documentation and discussion of the assumptions that were used and the potential implications of the assumptions on the outcome of the analyses.

6.3 Summary of Facts in Support of Recommendation:

A summary of facts for this recommendation is not applicable.

7. RECOMMENDATION 7: DISCUSS THE POTENTIAL EFFECTS OF CARRYOVER WATER ON SUSTAINABLE MANAGEMENT OF THE BASIN

The methodology used to distribute pumping in the baseline and other model scenarios assumed that pumping was constant every year and that all active wells produced the same volume of groundwater every year. While this approach preserves the water balance and allows the model to show how hydrologic variability affects groundwater conditions, it does not allow for assessment of the impacts of highly variable changes in groundwater pumping dependent on those same hydrologic conditions. Recent groundwater use in the LPVB has been below the current Operational Yield of 40,000 AFY, which indicates that some water rights holders have been accumulating carryover water, which is common during wet years.

Subsequent use of carryover water in dry years has the potential to effect groundwater sustainability and should be discussed.

7.1 Recommendations:
Discuss the potential effects of carryover water on sustainable management in the LPVB in light of the scenarios simulated for the BOY Study.

7.2 Technical Rationale for Recommendation:
Carryover is allowed by the Judgment recent historical pumping records show that some water rights holders have not used their allocations. Therefore some water rights holders are likely already accumulating carryover water that could lead to single-year groundwater production in excess of the Operational Yield, which may impact groundwater sustainability.

7.3 Summary of Facts in Support of Recommendation:

- Recent water use records show total pumping in the LPVB has been less than the Operational Yield.
- Some water rights holders have therefore been accumulating carryover water.
- Significant pumping in excess of the Operational Yield in a single year could occur if multiple parties elected to recover all their carryover water simultaneously.
- Pumping in excess of the Operational Yield has the potential to impact groundwater sustainability.

8. RECOMMENDATION 8: DOCUMENT AND DISCUSS UNCERTAINTIES IN THE MODEL RESULTS AS THEY RELATE TO THE FINDINGS OF THE BOY STUDY

Uncertainty in model results is presented alongside some values in section 2.1 of the draft BOY Study but then not explored further when describing the project scenario simulations, Basin Optimization Yield, or rampdown scenarios. Adding discussion of uncertainty and contextualizing quantified uncertainty would help readers understand the confidence that should be placed on the projections for LPVB management based on model simulations.

8.1 Recommendations:
Show quantitative estimates of uncertainties for all model simulation results, similar to those presented in section 2.1 and discuss how uncertainty should be considered in relation to project scenarios, Basin Optimization Yield, and rampdown.

8.2 Technical Rationale for Recommendation:
Relatively large amounts of uncertainty are presented in section 2.1 when discussing the sustainable yield estimates from the LPVB GSP. However, similar uncertainty quantification is not presented for the model scenario simulations developed as part of the BOY Study. Understanding the uncertainty associated with the information presented in the BOY Study may be important for stakeholders and policy makers when implementing the findings of the BOY Study. This understanding may also help reinforce the need for adaptive management of projects through consistent and high-quality groundwater monitoring.

8.3 Summary of Facts in Support of Recommendation:

- Quantitative uncertainty is presented for the sustainable yield estimates from the GSP but not for the yield and rampdown estimates presented in the BOY Study.
- Understanding uncertainty is important for stakeholders and policy makers.
- Documentation of uncertainty may also reinforce the need for adaptive management and consistent groundwater monitoring.

9. RECOMMENDATION 9: REVIEW AND CONSIDER SIGNIFICANT EDITS TO TEXT IDENTIFIED BY TAC

There are significant text edits identified through the TAC review that should be considered by the Watermaster in preparation for finalizing the draft BOY Study. Specific recommendations are referenced below.

9.1 Recommendations:

- Consider reframing the executive summary and section 6 to highlight the positive outcome that rampdown won't be necessary if the two identified projects proceed in a timely fashion and that both project and rampdown implementation will have to be adaptive processes guided by monitoring data and the required 5-year updates to the BOY Study. Suggested text for some of the revisions to the Executive Summary has been provided by Dr. Abrams and is attached.
- State in the BOY Study that simulated relative head changes are used and are deemed to be more reliable for comparing MTs to groundwater elevations. This is noted as a "shift" in hydrographs but should be more specific. Models are better at predicting head changes than they are at predicting actual heads. The second paragraph of section 1.3 might be a good place to include this information. Each instance of shifted hydrographs should also be identified in the text and on the relevant figures.
- Revise text in section 2.2 to refer to boundary *conditions* and the Somis fault as a barrier to groundwater flow as indicated in comments BA-7, 8, 9, 10, and 12 in the attached tabular comments.
- Consider including uncertainty in the presentation of sustainable yield in table 3-2 as a separate column where the uncertainty in the sustainable yield for each management area can be documented.
- Reference the Coastal Plain model uncertainty and difference between groundwater elevation observations during past in lieu water use presented in sections 2.2 and 3.1.4 when discussing assessment of model simulation results for the WLPMA in comparison to sustainability metrics. The intent would be to remind readers that the model simulated conditions at well 02N20W06R01 do not align with historical observations and that in practice sustainability in this area of the LPVB will be assessed using monitoring data and adaptive project management.
- Add explanatory text regarding the significant difference between the sustainable yield published in the First GSP Periodic Evaluation for the LPVB and the annual groundwater production rate identified in the basin-wide rampdown scenario.

- Add a table or tables in section 4 that summarize the Baseline, BOY Project, Basin-wide Rampdown, Differential Rampdown, and Sustainable Yield estimates for each management area to assist the reader in understanding the differences between the scenarios.
- Revise Conclusions to be consistent with changes to the Executive Summary and discuss all conclusions from the study. The existing Conclusions section is focused on the rampdown scenarios. All of the modeled scenarios should be discussed in this section along with reiterating that timely project implementation is shown to result in sustainable groundwater conditions without the need for basin-wide pumping reductions associated with rampdown. Suggested text for some of the revisions to the Conclusions was provided by Dr. Abrams and is attached. Also consider including a summary table of each scenario evaluated in the BOY Study in the conclusions to provide readers with context for the discussion of the conclusions.
- Develop and include a recommendations section. While the Judgment may not specifically call for recommendations, it would be prudent to include a discussion recommendations identified by the BOY Study. This should include recommendations for the rapid development of the projects identified in the BOY Study along with creation of contingency plans in case the projects are delayed or not successfully implemented, as raised in section 4. Recommendations could also include data needs, model clarifications and/or updates, and other ongoing tasks that would be prudent to consider pursuing ahead of the next update of the BOY Study.

9.2 Technical Rationale for Recommendation:

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

9.3 Summary of Facts in Support of Recommendation:

A summary of facts for this recommendation is not applicable.

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

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

10.1 Recommendations:

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

10.2 Technical Rationale for Recommendation:

See individual editorial comments for rationale.

10.3 Summary of Facts in Support of Recommendation:
A summary of facts for this recommendation is not applicable.

11. 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.

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

REPORT OF BASES FOR MAJORITY AND MINORITY COMMITTEE MEMBER POSITIONS

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

Attachment 1

Specific Comments from the Las Posas Valley Basin Technical Advisory Committee, Draft Basin Optimization Yield Study

Specific Comments from the Las Posas Valley Basin Technical Advisory Committee
Draft Basin Optimization Yield Study

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment
BB-1	Bryan Bondy	Editorial	Clarification	5	2.1	*"CMWD no longer maintains the ELP Model but has provided this model to FCGMA to support management of the Basin."*	Calleguas has not made a decision to stop maintaining the model.
BB-2	Bryan Bondy	Editorial	Editorial	7	3.1.2	*"Of course, the exact future hydrology is unknown. Therefore, the synthetic future hydrology is a source of uncertainty in any future model simulations."*	Standalone sentence - should it be included in the prior paragraph?
BB-3	Bryan Bondy	Editorial	Editorial	12, 13, and 16	3.2.3.1 & Tables 3-2 and 3-3	*N/A*	Baseline groundwater production value for Epworth Gravels Mgmt. Area listed in text does not match value in Tables 3-2 and 3-3.
BB-4	Bryan Bondy	Editorial	Editorial	15 and 16	3.3.1 & Table 3-3	*N/A*	Groundwater production values for ELPMA and WLPMA listed in text do not match values in Table 3-3.
BB-5	Bryan Bondy	Editorial	Editorial	v	N/A	*Second paragraph, first sentence "...that provided quantifiable groundwater at a level of detail that could be included in the model."*	Groundwater what? Levels, flow, budgets?
BB-6	Bryan Bondy	Technical	Analysis Assumptions	7	3.1.2	*N/A*	An unstated assumption of the modeling approach is that the modeled hydrology between 10/1/22 and now is identical to that which has actually occurred. Consider qualitatively describing the difference between modeled and actual hydrology for this period and briefly describe (qualitatively) the impact on interpretation of the results.
BB-7	Bryan Bondy	Technical	Analysis Assumptions	8	3.1.3	*N/A*	An unstated assumption of the modeling approach is that water in storage credited to Calleguas MWD by FCGMA will remain in storage. Should this water be recovered, water levels would be lower than simulated and minimum thresholds may not be achieved. Consider describing this (qualitatively) for context.
BB-8	Bryan Bondy	Technical	Clarification	v & 1	ES, 2nd paragraph & 1, 2nd paragraph	*N/A*	It is unclear how the Arroyo Simi-Las Posas water acquisition project (Basin Optimization Plan Project 5) was included in the various simulations. Please clarify in text and add a simple table that lists the amount of surface water that was simulated to enter the model domain via the SFR package from Simi Valley for each simulation.
BB-9	Bryan Bondy	Technical	Epworth Gravels Mgmt. Area	Various	Various	*N/A*	It is stated on page 13 that the sustainable production rate for the Epworth Gravels Mgmt. Area is 1,320 AFY. The baseline Epworth Gravels Mgmt. Area extractions were less than this (1,024 AFY). Given this, please explain why the Epworth Gravels Mgmt. Area extractions were reduced in the rampdown scenarios. Please also caveat the rampdown to alert policymakers to the fact that it appears that Epworth Gravels Mgmt. Area rampdown does not appear necessary from a technical perspective.
BB-10	Bryan Bondy	Technical	Epworth Gravels Mgmt. Area	13	3.2.3.1	*"not all groundwater producers with wells in the Epworth Gravels Management Area received an allocation in the Judgment (Figure 3-4)."*	Two comments. (1) Estimates of Epworth Gravels Mgmt. Area extractions that are not included in the analysis should be provided (i.e. groundwater producers w/o a Judgment allocation) for context. This can be estimated from historical extractions reported to FCGMA. (2) Is the Epworth Gravels Management Area the only management area that has groundwater producers w/o a Judgment allocation? If no, estimates should also be provided for those management areas for context.
BB-11	Bryan Bondy	Technical	Epworth Mgmt Area Sustainable Yield vs. Rampdown Pumping	18	3.4.1.1	*"The estimated sustainable yields of the Epworth Gravels Management Area and the ELPMA were approximately 500 and 1,450 AFY higher, respectively, than the simulated groundwater production in the Basin-wide Rampdown scenario."*	This difference for Epworth Gravels Mgmt Area is significant on a percentage basis. Text should be added to explain why this large of a difference exists.
BB-12	Bryan Bondy	Technical	Projects and Rampdown	v and 26-27	ES and 6	*N/A*	Please add more text to remind the reader that implementation of either projects or rampdown would be an adaptive process that is guided by monitoring data and the required 5-year updates to this document.

Specific Comments from the Las Posas Valley Basin Technical Advisory Committee
Draft Basin Optimization Yield Study

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment
BB-13	Bryan Bondy	Technical	Rampdown Rate	N/A	5	*N/A*	It appears that the rampdown rates are based on an assumption that the amount of surface water entering ELPMA from Simi Valley will not change even if the Arroyo Simi-Las Posas water acquisition project (Basin Optimization Plan Project 5) is not executed. This should be made clear in the text and the rampdown rate should be caveated accordingly.
BB-14	Bryan Bondy	Technical	Rampdown Rate	18	3.4.1.1	*N/A*	Please clarify how rampdown was simulated in the rampdown model scenarios. It is unclear whether pumping at that the fully reduced rate was used for the entire rampdown period or if pumping was reduced incrementally each year during the rampdown period. If it is the former, the results should be caveated because the model scenario may be underestimating pumping and the resulting simulated groundwater levels may be overestimated.
BB-15	Bryan Bondy	Technical	Recommendations	N/A	N/A	*N/A*	There is no recommendations section. While the Judgment may not specifically call for recommendations, it would be prudent to include a discussion of data needs, model clarifications/updates, etc. that would be prudent to consider pursuing ahead of the next update of this document.
BB-16	Bryan Bondy	Technical	Technical	16	3.3.2.1	*"Although the groundwater elevation at the third well, Well 02N20W06R01, remained below the minimum threshold during the Projects Scenario, the groundwater elevation at the end of the scenario was similar to the elevation at the start of the scenario. This suggests that if the initial groundwater elevation can be raised at this well, ongoing production at the rates simulated in the Projects Scenario will maintain the groundwater elevation in the future."*	This text is unclear. What is meant by "if the initial groundwater elevation can be raised at this well"? How would this initial groundwater level increase be achieved? Would it be more appropriate to say that the simulated groundwater elevations are close to the MT and that is reasonable to conclude that the MT could be achieved consistently when considering uncertainty in the WLPMA model?
BB-17	Bryan Bondy	Technical	WLPMA Sustainable Yield vs. Rampdown Pumping	18	3.4.1.1	*"The estimated sustainable yield of the WLPMA in the First Periodic Evaluation was approximately 3,300 AFY lower than the simulated groundwater production in the Basin-wide Rampdown scenario."*	This is significant difference. Text should be added to explain why this large of a difference exists.
TM-1	Tony Morgan	General Editorial	spell out abbreviation	1	1.1	*LPV Judgment*	first use of Las Posas Valley so spell out abbreviation - Las Posas Valley (LPV) Judgment
TM-2	Tony Morgan	General Editorial	spell out abbreviation	5	2	*ELP Model; a MODLFOW numerical model…*	first use of ELP - spell out
TM-3	Tony Morgan	General Technical	model uncertainty	5	2.1	*uncertainty bounds in the sustainable yield …estimated using the ELP Model of ±2,300 AFY…*	the ±2,300 AFY uncertainty (on an ~18,000 AFY yield) is significant – on the order of 13% – which directly affects confidence in the BOY and rampdown values
TM-4	Tony Morgan	Technical	model uncertainty	6	2.1	*…uncertainty bounds in the sustainable yield for the WLPMA estimated using the GSP version of the VRGWFM of ±1,200 AFY …*	How is the model uncertainty considered in the analyses?
TM-5	Tony Morgan	Technical	sustainable yield uncertainty	22	4	*…model scenarios simulated for this BOY Study the Basin Optimization Yield is estimated to be 36,860 AFY if the in-lieu surface water delivery projects are implemented…*	How is the model uncertainty reflected in this value? Is it 36,860 AFY+/- the uncertainty?
TM-6	Tony Morgan	Technical	rampdowns	24	5.2	*…scenario groundwater production was reduced by 20% relative to the Baseline Scenario pumping in the WLPMA…*	It is recognized that the model used for WLPMA under predicts WLs for the Key Wells. If a 20% rampdown is needed per the model to ultimately get WLs above the MT, isn't it logical to assume that a lesser rampdown could achieve comparable results when the WLs are corrected for the under prediction tendencies of the model? It didn't seem like the underprediction was accounted for, at least semiquantitatively, in the analyses. Is the report suggesting a rampdown quantity that is too aggressive?

Specific Comments from the Las Posas Valley Basin Technical Advisory Committee
Draft Basin Optimization Yield Study

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment
TM-7	Tony Morgan	Technical	conclusions	26	6	*Conclusion*	why does the Conclusion section focus solely on the ramp-down scenarios? Per Section 1, *the BOY Study evaluates groundwater conditions under three potential future production scenarios: (1) continued production at 40,000 acre-feet per year (AFY), the initial Operating Yield defined in the Judgment, (2) implementation of two groundwater in-lieu projects evaluated in the Basin Optimization Plan (BOP), and (3) a ramp-down scenario to determine the BOY in the event that the projects are not implemented.*. . Discussions of all three scenarios should be included in the Conclusions. Isn't the major take-away message that if the in-lieu delivery projects can be implemented promptly, then ramp-downs are not likely to be needed? Don't bury (or omit) the lead message.
TM-8	Tony Morgan	Technical	conclusions	26	6		It would be useful to the reader to have a summary table for each of the scenarios evaluated in the report. There are lots of numbers in the document. A summary in the conclusions makes it easier to compare the scenario outcomes. Suggest a table (with supporting text) that lists for each key well when each scenario brings water levels above the MT, is the MT achieved before 2040, water level trends (up or down), do water level trends suggest that MO will be met, etc.
TM-9	Tony Morgan	Technical	possible typo	7	3.1.1	*The future scenarios developed for the BOY Study simulate groundwater conditions in the Basin over the 47-year…*	reference to a “37-year modeled period” for trends in section 3.4.2.2 – this appears to be a typo, since the scenarios run 47 years
TM-10	Tony Morgan	Technical	timing of project implementation	8	3.1.3	*Table 3-1*	Table 3-1 indicates Time Period for Implementation as "Water Year 2027", but does not specifically identify when in WY2027 the water deliveries were initiated in the model
TM-11	Tony Morgan	Technical	timing of project implementation	8	3.1.3	*…the in-lieu project deliveries are not currently occurring. If implementation of the in-lieu project is delayed for multiple years, the modeled impacts of the project on groundwater levels in this BOY Study may 'overestimate the impact of this project…*	since these projects depend on agencies outside the Watermaster’s direct control, there is uncertainty in their yield and timing. The study already notes no agreements are signed yet. It might be prudent to recommend contingency planning (e.g., if by year X the projects are behind schedule, implement phased rampdowns to compensate). This is hinted in Section 4 (if Project 2 is not fully implemented, consider a Rampdown), which is a good inclusion.
TM-12	Tony Morgan	Technical	SGMA compliance	9	3.1.4	*…in the WLPMA, the long-term groundwater production rate was determined to be potentially sustainable if groundwater elevations remained stable over the future model period, such that the ending groundwater level was equal to or higher than the starting groundwater elevation."*	an additional criterion is used: a pumping rate is considered potentially sustainable if groundwater levels **stabilize or rise over the future period**, even if they start (and end) below the MT. It’s important to highlight the risk of allowing “stable but below-threshold” conditions, even temporarily, technically means undesirable results (as defined in the GSP) persist until those levels rise above MT. The study implies that with projects or rampdown, those key wells might not reach MT by 2040 but could soon after.
TM-13	Tony Morgan	Technical	Baseline Scenario extractions	10	3.2.2	*…the selected approach, with which the TAC concurred, was to distribute the Annual Allocation based on the reported pumping and MWC deliveries for DWR water year 2024…*	The distribution method ensures every drop of the 40,000 AFY is assigned to a specific well or MWC, preserving the water balance, and does so in a way that reflects current (2024) usage patterns. The model does not account for underutilization (which has occurred in the past couple of years) which results in carryover amounts that can have an as yet unmodeled impact on future water levels. The baseline scenario is logical, however, it would be useful to be more forthcoming with the shortcomings of the scenario assumptions as predictors of future conditions.
TM-14	Tony Morgan	General Technical	modeling assumptions	10	3.2.2		The modeling approach could be more robust by accounting for the carryover amounts earned in the wet periods and their use in subsequent dry periods. For example, assume carryover was earned in "above normal wet years" at a rate consistent with GW use in recent wet years. The carryover would be used in dry years when irrigated water demand is greater than the average. It is not clear how this would impact efforts to bring GW levels above the MT, but it would offer a more likely scenario for how the basin would operate.
TM-15	Tony Morgan	Technical	estimated sustainable yield uncertainty	12	3.2.2.2	*Table 3-2 Estimated Sustainable Yield*	shouldn't the sustainable yield be +/- the uncertainty ? Suggest adding another column to show the possible range of the sustainable yield OR put the range in paretheses in the same cell as the Estimated Sustainable Yield. For example, WLPMA Estimated Sustainable Yield is 11,400 (10,200-12,600), ELPMA + EG is 19,230 (16,930-21,530). LPVB sustainable yield is 30,630 (27,137-34,130).

Specific Comments from the Las Posas Valley Basin Technical Advisory Committee
Draft Basin Optimization Yield Study

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment
TM-16	Tony Morgan	Technical	in lieu amounts	17	3.2.2.2	*...the LAS groundwater production was reduced by 1,760 AFY to simulate implementation of the in-lieu surface water delivery project to Zone MWC and VCWWD 19."*	Is the in lieu delivery amount being overestimated because the WLPMA model under predicts WL responses to imported water? Could a lesser in lieu amount achieve the same result if the model's WLs were adjusted to account for the underprediction?
TM-17	Tony Morgan	Technical	possible typo	15	3.3.1	*The resulting groundwater production rates were 16,656 AFY in the WLPMA and 16,420 AFY in the ELPMA (Table 3-3).*	Table 3-3 shows ELPMA pumping as 19,179 AFY in the Projects scenario, but 16,420 AFY in text. Looks like the text should be changed to 19,179 AFY which is consistent with modeled ~7% reduction. Similar for WLPMA - Table 3-3 shows 16,657 AFY, text says 16,656 AFY– likely typo.
TM-18	Tony Morgan	Technical	estimated sustainable yield uncertainty	16	3.3.1	*Table 3-3*	how is model uncertainty accounted for in this table?
TM-19	Tony Morgan	Technical	SGMA compliance	16	3.3.2	*...if the initial groundwater elevation can be raised at this well, ongoing production at the rates simulated in the Projects Scenario will maintain the groundwater elevation in the future.*	WLPMA meets the softer criterion (stable levels at the problematic well). From a hydrogeologic standpoint, the in-lieu deliveries clearly mitigate drawdown in the targeted areas. It just flags one gap - one location still below threshold, requiring either trust in model correction of flow across Somis fault or additional management.
TM-20	Tony Morgan	Technical	SGMA compliance	19	3.4.1.2	*In the WLPMA, simulated groundwater elevations remained above the minimum threshold groundwater elevation at two of three Key Wells...*	The 20% reduction predicted water levels would remain below the MT in one Key Well. So, a 20% reduction is not actually consistent with SGMA goals of avoiding undesirable results. It is unknown if this "modified approach" to SGMA compliance is acceptable to DWR. Report states that model response is "...dampened relative to historical observations" therefore, groundwater elevations in this well are expected to be above the MT. What happens to the groundwater elevations in the other key wells if we account for the "dampened response"? Are we suggesting that a rampdown of some amount less that 20% is adequate if the dampened response is accounted for? If so, why not present the model results for that lower value? Does the use of a 20% rampdown put unnecessarily stringent cuts on ELPMA & Epworth?
TM-21	Tony Morgan	Technical	rampdowns	20	3.4.2.1	*...it should be noted that simulated groundwater elevations exhibited a declining trend over the 37-year modeled period."*	under the 11% cut, ELPMA is still *mildly overdrafting* , which is consistent with the note that water levels in ELPMA show a declining trend over the 47-year simulation (albeit all above MT). Is the declining trend over the SGMA compliance timeframe consistent with SGMA compliance requirements?
TM-22	Tony Morgan	General Editorial	add PVB, LPV, ELP, WMID to list of abbreviations	iii			
TM-23	Tony Morgan	General Technical	Somis fault/model boundaries				The WLPMA model has assigned properties to the Somis fault that are inconsistent with current hydrogeologic understanding. Before the next BOYS or Periodic Evaluation update, it is recommended that the model be updated to reflect our hydrogeologic conceptual model. This allows the forward forecasts to be used without having to consider the "dampened results" correction factor.
BA-1	Bob Abrams	Technical	Setting the tone of the report (that the report presents good news)	v	Executive Summary		Overall, the BOYS study and report present good news that rampdown won't be necessary if the two projects proceed in a timely fashion. Suggest revising the Executive Summary to highlight this and support better understanding of terms in the Judgment, such Operating Yield, etc. Please see accompanying Word file that presents my suggested revisions.
BA-2	Bob Abrams	Editorial	Conforming main text to suggested revised Executive Summary	v	Executive Summary		Left to Dudek to revise main text to hit the highlights noted in the suggested revised Executive Summary
BA-3	Bob Abrams	Editorial	Delete unneeded comma	3	1.3	*Undesirable results were defined in the GSP for the three management areas of the Basin: the East Las Posas Management Area (ELPMA), the Epworth Gravels Management Area, and the West Las Posas Management Area (WLPMA) , (FCGMA 2019).*	Delete identified comma (in red)

Specific Comments from the Las Posas Valley Basin Technical Advisory Committee
Draft Basin Optimization Yield Study

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment
BA-4	Bob Abrams	Technical	Use of modeled heads for MT metric versus head changes (i.e., the "shift" used in hydrographs)	3	1.3	*Because the MTs are the metric by which groundwater conditions in the Basin are determined to be sustainable, the BOY Study compares simulated future groundwater elevations in the Basin to the MTs at the Key Wells in the Basin. Future groundwater elevations were simulated using the two numerical groundwater models that cover the three management areas of the Basin. Simulated production rates that result in long-term stability of the groundwater elevations at levels above the MTs are considered sustainable. The Basin Optimization Yield is the production rate, with implementation of the Basin Optimization Projects that can be reasonably implemented by 2040 and maintains groundwater elevations above the MTs.*	Somewhere in the main text it should be stated that simulated relative head changes are used to compare to MTs for groundwater elevations. This is noted as a "shift" in hydrographs, but should be more specific. Models are better at predicting head changes than they are at predicting actual heads. This paragraph might be a good place to do that.
BA-5	Bob Abrams	Editorial	Inconsistent use of acronyms	5	2	*Coastal Plain Model: a version of the Ventura Regional Groundwater Flow Model (VRGFM) MODFLOW numerical model developed and maintained by UWCD, which covers the entirety of the WLPMA, Oxnard Subbasin, PVB, and Mound Subbasin (UWCD 2018).*	Ventura Regional Groundwater Flow Model is sometimes abbreviated as VRGFM and sometimes as VRGWFM. Be consistent.
BA-6	Bob Abrams	Editorial	Delete unneeded word	5	2	*Therefore, the only change FCGMA made to the model for the First Periodic Evaluation was to extend the simulation time period through the end of water year 2022 (i.e., September 30, 2022) (FCGMA 2024*	Delete the word "time" (in red)
BA-7	Bob Abrams	Technical	Model "boundary" and modeled "boundary condition" are not the same thing and cannot be used interchangeably	6	2.2	*Although the Coastal Plain Model included improved hydrogeologic conceptual model data in several groundwater basins, the update also included a revision to the model boundary at the eastern edge of the WLPMA.*	Revise to: Although the Coastal Plain Model included improved hydrogeologic conceptual model data in several groundwater basins, the update also included a revision to the model boundary condition at the eastern edge of the WLPMA.
BA-8	Bob Abrams	Technical	Somis Fault is observed to be a flow barrier; should emphasize that this is an observation and not a model phenomenon	6	2.2	*In previous versions of the model, the boundary between the ELPMA and WLPMA was represented using a no-flow boundary condition, which is consistent with the Somis Fault acting as a barrier to groundwater flow between the two management areas (FCGMA 2019).*	Revise to: In previous versions of the model, the boundary between the ELPMA and WLPMA was represented using a no-flow boundary condition, which is consistent with the observation that the Somis Fault acts as a barrier to groundwater flow between the two management areas (FCGMA 2019).
BA-9	Bob Abrams	Technical	Model "boundary" and modeled "boundary condition" are not the same thing and cannot be used interchangeably	6	2.2	*In contrast, the model boundary in the version of the model used in the First* *Periodic Evaluation and in this BOY Study is a general head boundary condition ...*	Insert the word "condition" as indicated in red. THERE ARE also two other instances in the next paragraph to insert the word "condition." One is noted in next comment along with suggested change in wording.
BA-10	Bob Abrams	Technical	Model "boundary" and modeled "boundary condition" are not the same thing and cannot be used interchangeably, and clarification	6	2.2	*...simulated groundwater elevations do not rise as rapidly in response to* *reduced groundwater production as they would if the model boundary were a no-flow boundary.*	Revise to: ...simulated groundwater elevations do not rise as rapidly in response to reduced groundwater production as they would if the model boundary condition had not been changed from a no-flow boundary to a general head boundary. ~~they would if the model boundary~~
BA-11	Bob Abrams	Technical	Missing or extra words	6	2.2	*This rise is similar to that measured in the historical data between 1994 and 2006, when CMWD was delivering imported water in-lieu groundwater delivery to WLPMA*	Revise to: This rise is similar to that measured in the historical data between 1994 and 2006, when CMWD was delivering imported water in lieu of local groundwater pumping to the ~~r in-lieu groundwater delivery to~~ WLPMA

Specific Comments from the Las Posas Valley Basin Technical Advisory Committee
Draft Basin Optimization Yield Study

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment
BA-12	Bob Abrams	Technical	Model "boundary" and modeled "boundary condition" are not the same thing and cannot be used interchangeably, and clarification	7	2.2	*The comparison of the observed historical change in groundwater elevation to the modeled change in groundwater elevation indicates that the model boundary change has introduced additional uncertainty into the predictive capabilities of the model in this region. Future work should be conducted to reduce this uncertainty by recalibrating the revised model using a no-flow boundary to better represent the hydrogeologic conceptual model of this area.*	Revise to: The comparison of the observed historical change in groundwater elevation to the modeled change in groundwater elevation indicates that UWCD's change to the model boundary condition between the WLPMA and ELPMA ~~model boundary change~~ has introduced errors and additional uncertainty into the predictive capabilities of the model in this region. Future work should be conducted to fix this error and reduce this uncertainty by recalibrating the revised model using a no-flow boundary condition to ~~better~~ represent the hydrogeologic conceptual model of this area.
BA-13	Bob Abrams	Editorial	Grammer	7	2.2	*Watermaster and TAC agreed that, while the change in the model boundary is not consistent with the hydrogeologic conceptual model, groundwater management decisions will be based on observed water levels, rather than model simulation .*	Change to "simulations"
BA-14	Bob Abrams	Editorial	Run-on sentence	7	2.2	*Because the UWCD model is capable of simulating groundwater elevations in the eastern portion of the WLPMA that rise above the minimum threshold prior to 2040 and remain above the minimum threshold from 2040 to 2070, use of the UWCD model files developed for the Periodic Evaluation remains the best available option to evaluate the BOY and complete this first BOY study prior to the beginning of the 2027 water year (October 1 2026 – September 30, 2027) (FCGMA 2025b).*	Change to: The UWCD model is capable of simulating groundwater elevations in the eastern portion of the WLPMA that rise above the minimum threshold prior to 2040 and remain above the minimum threshold from 2040 to 2070. Thus, the use of the UWCD model files developed for the Periodic Evaluation remains the best available option to evaluate the BOY and complete this first BOY study prior to the beginning of the 2027 water year (October 1, 2026 – September 30, 2027) (FCGMA 2025b)
BA-15	Bob Abrams	Editorial	Needs additional clarification	8	3.1.3	*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).*	Need a statement as to why this water can't continue without purchasing or leasing.
BA-16	Bob Abrams	Editorial	Needs additional clarification	10	3.1.4	*However, the updated Coastal Plain Model did not reproduce the same magnitude of groundwater elevation response as was observed historically (Figure 2-1). Therefore, project implementation and adjustment through groundwater elevation monitoring are expected to bring groundwater elevations back above the MT. Once the groundwater elevations are higher than the MT, a long-term production rate that results in stable groundwater elevations that remain above the MT is sufficient to avoid undesirable results.*	Revise to: However, the updated Coastal Plain Model did not reproduce the same magnitude of groundwater elevation response as was observed historically (Figure 2-1). Therefore, project implementation and adjustment of in-lieu delivery rates driven by ~~through~~ groundwater elevation monitoring are expected to bring groundwater elevations back above the MT. Once the groundwater elevations are higher than the MT, a long-term production rate can be determined that results in stable groundwater elevations that remain above the MT is sufficient to avoid undesirable results.
BA-17	Bob Abrams	Technical	Needs additional clarification	10	3.1.4	*Based on these results, a simulated groundwater flux of 800 AFY or less across the boundary between Oxnard Subbasin and the WLPMA was considered sustainable in this BOY Study.*	Which direction? Should state.
BA-18	Bob Abrams	Editorial	Grammer	10	3.2.1	*Additionally, some agricultural properties that historically reported extractions did not receive allocation.*	Insert the word "an": Additionally, some agricultural properties that historically reported extractions did not receive an allocation.

Specific Comments from the Las Posas Valley Basin Technical Advisory Committee
Draft Basin Optimization Yield Study

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment
BA-19	Bob Abrams	Technical	Terminology	10	3.2.1	*Because the BOY Study is intended to assess the ability of projects to maintain the BOY at as close to 40,000 AFY as possible, and to evaluate the need for a Rampdown relative to the Basin Optimization Yield, this BOY Study used the Water Year 2024 Annual Allocations published by the Watermaster as the basis for extractions in the numerical groundwater models.*	Revise to: Because the 2025 BOY Study is intended to assess the ability of projects to maintain the BOY at as close to 40,000 AFY as possible, and to evaluate the need for a Rampdown relative to the Initial Operating ~~Basin Optimization~~ Yield, this BOY Study used the Water Year 2024 Annual Allocations published by the Watermaster as the basis for extractions in the numerical groundwater models
BA-20	Bob Abrams	Technical	Wording	12	3.2.2.2	*The differences between the Baseline Scenario production rate and the average groundwater production from water years 2016 to 2024 are shown in Figure 3-4.*	Should state explicitly if these differences are increases or decreases, here and on Figure 3-4. e.g., text could say increases and decreases are shown on Figure 3-4. Figure legend could indicate which ranges equate to increases and which to decreases.
BA-21	Bob Abrams	Technical	Clarification	13	3.2.3.1	*If, during water year 2024, these Water Right Holders pumped less than average from the Epworth Gravels Management Area wells, the baseline pumping distribution in the BOY Study Baseline Scenario*	There should be some kind of text explaining that this is unavoidable and HOW THIS WILL be accounted for in the Operating Yield/
BA-22	Bob Abrams	Technical	Clarification	13	3.2.3.1	*Groundwater production at the Baseline Scenario rates was determined not to be sustainable in the ELPMA because simulated groundwater elevations at five Key Wells fell below the minimum threshold groundwater during the 47-year model run (Figure 3-6).*	Were these simulated hydrographs also shifted, as in Figure 3-5. If so there should be a note on the figure. Also, I think you need to say somewhere in the main text that you have more faith in simulated groundwater changes, than simply the simulated elevations.
BA-23	Bob Abrams	Technical	Clarification	15	3.3.1	*As discussed in Section 3.1.3, the Projects Scenario incorporated 1,760 AFY of surface water deliveries to offset groundwater production from six wells in the eastern WLPMA, and 1,380 AFY of surface water deliveries to offset production from three wells in the ELPMA.*	Which six wells? Which three wells?
BA-24	Bob Abrams	Technical	Interpretation of the Judgment	18	3.4.1.1	*The total extraction rate for the Basin-wide Rampdown Scenario was 32,000 AFY (Table 3-3).*	However, the Rampdown should be the Initial Operating Yield minus the BOY, or 40,000 acre-feet per year (AFY) minus 36,860 AFY. Accordingly, the Rampdown should be 3,140 AF, or approximately 224 AFY over the 14-year period between now and 2040. Further, my understanding is that the Judgment does not contemplate a no-project Rampdown or Rampdown Rate.
BA-25	Bob Abrams	Technical	Clarification	24	5.1	*Consistent with the Judgment, this initial BOY Study calculates a Rampdown Rate for a Basin-wide reduction in groundwater pumping if the projects are not implemented. The Rampdown Rate is the annual reduction in groundwater necessary to have the Operating Yield equal the Sustainable Yield by the fall of 2039 (Judgment §§1.89 and 4.10.1.4).*	Insert the word "production" as indicated in red: Consistent with the Judgment, this initial BOY Study calculates a Rampdown Rate for a Basin-wide reduction in groundwater pumping if the projects are not implemented. The Rampdown Rate is the annual reduction in groundwater production necessary to have the Operating Yield equal the Sustainable Yield by the fall of 2039 (Judgment §§1.89 and 4.10.1.4).
BA-26	Bob Abrams	Technical	Interpretation of the Judgment	24	5.1		As noted above, the Rampdown should be the Initial Operating Yield minus the BOY, or 40,000 acre-feet per year (AFY) minus 36,860 AFY. Accordingly, the Rampdown should be 3,140 AF, or approximately 224 AFY over the 14-year period between now and 2040. Further, my understanding is that the Judgment does not contemplate a no-project Rampdown or Rampdown Rate.
BA-27	Bob Abrams	Technical	Clarification	26	6		Suggest revising conclusions based on the suggested revisions to the Executive Summary. Please see accompanying Word file that presents my suggested revisions to the Conclusions section.
CT-1	Chad Taylor	Editorial	Error	3	1.3	*The Rampdown was calculated over a 13-year period…*	The rampdown period is identified as 14 years in other sections.
CT-2	Chad Taylor	Editorial	Missing footnote/endnote	3	1.3	*…(DWR water year 2027 through water year 2039 [1])…*	There is no footnote or endnote corresponding to the note identified in the second to last paragraph on page 3.

Specific Comments from the Las Posas Valley Basin Technical Advisory Committee
Draft Basin Optimization Yield Study

Comment ID	Commentor	Technical or Editorial Comment	Topic	Page Number	Section ID	Quoted Text	Comment
CT-3	Chad Taylor	Editorial	missplaced word	13	3.2.3.1	*The simulated groundwater elevation declines in the northern ELPMA are consistent with previous model scenarios evaluated in for the GSP …*	Remove the unnecessary *for* in the last sentence of the last paragraph on the page.
CT-4	Chad Taylor	Editorial	Inconsistent values	15-16	3.3.1	*The resulting groundwater production rates were 16,656 AFY in the WLPMA and 16,420 AFY in the ElPMA (Table 3-3)*	The values referenced in this text don't match those in Table 3-3
CT-5	Chad Taylor	Technical	Rampdown and water budget	19	3.4.1.3	*…inflows exceed outflows by approximately 500 AFY in the Basin-wide Rampdown Scenario.*	Could the rampdown volume and rate for the WLPMA have been reduced if the simulation of pumping reduction resulted in a closer correlation of inflow and outflow? Was the difference between inflow and outflow necessary to recover from historical water level declines.
CT-6	Chad Taylor	Editorial	Inconsistent values	20	3.4.2.2	*…however, it should be note that simulated groundwater elevations exhibited a declining trend over the 37-year model period.*	In other sections of the report the model period is identified as 47 years.
CT-7	Chad Taylor	Editorial	Add comparison / compilation tables	22	4		Consider adding a table or tables in section 4 that summarize the Baseline, BOY Project, Basin-wide Rampdown, Differential Rampdown, and Sustainable Yield estimates for each management area to assist the reader in understanding the differences between the scenarios.
CT-8	Chad Taylor	Editorial	Expand explanation	24	5.1		Consider expanding the explanation of the rampdown period. As presented lay readers may not understand how the period from the fall of 2026 through the fall of 2039 equates to 14 years and is the appropriate denominator for calculating the rampdown period.
CT-9	Chad Taylor	General Technical	Rampdown period and sustainable conditions	24-25	5		It is not clear in Section 5 how water levels, which are the metric the BOY Study identifies will be used for assessing sustainability, are expected to react to the rampdown period. The model scenarios appear to indicate that over a 47 year period the annual groundwater production volumes pumped in the rampdown scenarios will achieve sustainability. However, the BOY Study does not appear to assess how long after reaching the rampdown pumping rate it will take for water levels to rise to the thresholds identified as sustainable. One assumes that prolonged pumping at rates in excess of the rampdown rate will result in water levels below the minimum thresholds in representative monitoring wells and it is not clear that one year of pumping at the rampdown rate at the end of the 14 year rampdown period will be sufficient to facilitate water level recovery.

aquilogic, Inc.
environment ● water ● strategy

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

DRAFT MEMORANDUM

To: Chad Taylor, PG, CHg, LPVB Watermaster TAC Administrator
From: Bob Abrams, PhD, PG, CHg., LPVB Watermaster TAC Member
Date: January 23, 2026

Subject: Comments on the Draft Basin Optimization Yield (BOY) Study for the Las Posas Valley Basin (LPVB) Report and the Draft Water Year 2025 Annual Report
Project No.: 091-01

This memorandum is provided to transmit my comments on the draft LPVB BOY Study report and the draft Water Year 2025 Annual Report. Both draft reports are generally well-written. My email submittal contains four electronic files: (1) a native Excel spreadsheet of comments for the BOY Study report; (2) a native Word file providing suggested revisions to the BOY Study report Executive Summary (in Track Changes); (3) a native Word file providing suggested revisions to BOY Study report Conclusions (in Track Changes); and (4) a native Excel spreadsheet of comments for the Annual Report. Items 2 and 3 are also provided as **Attachments 1** and **2** to this memorandum.

The suggested revisions to the Executive Summary and Conclusions are provided in an attempt highlight the major finding of the BOY Study report. That is, Rampdown is not needed if the two projects described in the report are implemented as scheduled. **Attachments 1** and **2** are not necessarily provided as replacements for the respective sections of the report. Rather, they are provided as suggested text that may improve the messaging of the BOY Study report, which may help the layperson understand the main outcome of the BOY Study.

I should also note that my interpretation of the Judgment is that Rampdown should be the Initial Operating Yield minus the BOY, or 40,000 acre-feet per year (AFY) minus 36,860 AFY. Accordingly, the Rampdown should be 3,140 AF, or approximately 224 AFY over the 14-year period between now and 2040. Further, my understanding is that the Judgment does not contemplate a no-project Rampdown or Rampdown Rate.

Attachment 2

Recommended Edits to Executive Summary and Conclusions Sections, Draft Basin Optimization Yield Study, prepared by Bob Abrams, PhD

Suggested Revisions to Executive Summary

In conformance with the Judgment adjudicating groundwater rights in the Las Posas Valley Groundwater Basin (Basin), this report presents the results of the first Basin Optimization Yield (BOY) Study. The results of this BOY Study indicate that if the projects selected from the Basin Optimization Plan (BOP), Project 2 and Project 5, are implemented as scheduled, the BOY is 36,860 acre-feet per year (AFY).[1] BOP Project 2 is the purchase of imported water from Calleguas Municipal Water District (CMWD) for Basin replenishment. BOP Project 5 is an Arroyo Simi-Las Posas water acquisition project. It is anticipated that Rampdown will not be necessary during this five-year period, but could be implemented if conditions change based on monitoring, production levels, or failure to achieve anticipated progress implementing the BOP-identified projects.

The initial scope of this Study was reviewed by both the Technical Advisory Committee (TAC) and Policy Advisory Committee (PAC) for the Basin. The BOY was estimated using numerical groundwater model simulations that incorporated differing groundwater production rates and imported water associated with BOP Projects 2 and 5. The scenarios modeled included a Baseline, Project, and Rampdown Scenarios.

Two numerical groundwater models were utilized for this BOY Study. For the East Las Posas Management Ares (ELPMA), the groundwater model developed by CMWD was used. For the West Las Posas Management Ares (WLPMA), the Coastal Plain Model (CPM) developed by United Water Conservation District (UWCD) was used. The CPM incorrectly characterizes the boundary between the ELPMA and WLPMA (i.e., the Somis Fault), which allows groundwater to flow from the WLPMA to the ELPMA, contrary to conditions observed in the field. This reduces the simulated effectiveness of Project 2 in the WLMPA. Therefore, the BOY of 36,860 AFY should be considered a minimum value, because water levels observed in the field will increase more than the increase simulated by the CPM. This model error should be rectified prior to the 2030 BOY Study.

In the Baseline Scenario, groundwater production equaled the Initial Operating Yield of 40,000 AFY set by the Judgment. In the Projects Scenario, groundwater production was reduced at nine wells owned and operated by Zone Mutual Water Company (ZMWC), Ventura County Waterworks District 19 (VCWWD 19), and Ventura County Waterworks District 1 (VCWWD 1). The reduced groundwater production was replaced with imported water consistent with BOP Project 2. BOP Project 5 is a continuation of imported water that is currently discharged to Arroyo Simi-Las Posas outside of the Basin and therefore did not require any modifications to the numerical models. The Rampdown Scenario was developed to provide an estimate of the Rampdown that may be required in the unlikely event that BOP Projects 2 and 5 are not implemented as scheduled.

[1] In the Judgment, WY 2026 is defined as the period October 1, 2026 through September 30, 2027 and WY 2029 is defined as the period October 1, 2029 through September 30, 2030.

Simulated groundwater production at the Initial Operating Yield of 40,000 AFY was determined to be unsustainable because modeled future groundwater elevations at several Key Wells, or representative monitoring points, fell below the minimum threshold (MT) groundwater elevations established in the Groundwater Sustainability Plan (GSP) for the Basin. In the Projects Scenario, the BOY (the estimated yield that is projected to be available to achieve sustainable groundwater management by 2040) was determined to be 36,860 AFY. It should be noted that BOP Projects 2 and 5 rely on other water agencies for implementation. Thus inter-agency coordination is critical. Initial discussions between the Watermaster and these agencies have begun, but coordination agreements between the agencies have not yet been drafted.

In the unlikely event that BOP Projects 2 and 5 are not implemented, the BOY Study evaluated the Rampdown and Rampdown Rate for the Basin for two scenarios (in addition to the analysis required by the Judgment). In the first scenario, referred to as the Basin-wide Rampdown Scenario, groundwater production was reduced uniformly in all management areas relative to the Initial Operating Yield of 40,000 AFY until groundwater conditions avoided the undesirable results specified in the GSP. In this Scenario, the Operating Yield for WYs 2026-2029, without implementation of BOP Projects 2 and 5, was determined to be approximately 32,000 AFY.

If BOP Project 2 and 5 are not implemented, Rampdown under the first scenario is 8,000 AFY of groundwater production. Under this Rampdown 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. The Rampdown Rate in the absence of projects was determined by dividing the Rampdown by the 14-year period over which it will be implemented. The no-projects Rampdown rate would be 571 AFY.

The no-projects Operating Yield may be higher than 32,000 AFY if circumstances indicate that a uniform Rampdown for all management areas is not appropriate pursuant to the Judgment's provisions on differential Rampdown. Thus, in the second Rampdown scenario, referred to as the Differential Rampdown Scenario, Rampdown differed by management area. Under this scenario the Operating Yield, in the absence of projects, was determined to be 33,942 AFY, and the overall Rampdown was 6,058 AFY. Groundwater production was reduced in this scenario by 3,683 AFY in the WLPMA, 2,261 AFY in the ELPMA, and 113 AFY in the Epworth Gravels Management Area. This scenario avoided undesirable results while maintaining higher overall groundwater production rates than the Basin-wide Rampdown Scenario.

It should be noted that three additional projects were identified in the BOP that could be implemented prior to WY 2040. These additional projects were not simulated in the 2025 BOY Study but should be considered for the 2030 BOY Study under the Judgment's standard for inclusion. These projects have the potential to raise the Basin Optimization Yield, and thus the Sustainable Yield, to the target 40,000 AFY by WY 2039. It should also be noted that WY 2025 groundwater extractions were only 32,656 AF and

WY 2024 groundwater extractions were only 28,031 AF.[2] Thus, the error in the CPM noted above and the low actual groundwater extractions during the last two WYs further support the determination that Rampdown is not presently needed if BOP Projects 2 and 5 are implemented as scheduled.

[2] These values are from the Draft Water Year 2025 Annual Report (note that the California Department of Water Resources [DWR] defines WY 2025 as the period October 1, 2024 through September 30, 2025). The Draft Water Year 2025 Annual Report notes that 86% of groundwater extractions had been reported by the time the draft report was releases.

Attachment 2: Suggested Revisions to Conclusions

Based on numerical modeling, with consideration of the inherent limitations of the models, the results of this BOY Study indicate that if BOP Project 2 and BOP Project 5 are implemented as scheduled, the BOY for WY 2026 through WY 2029 is 36,860 AFY, rendering Rampdown unnecessary at present. However, if these projects are not implemented as scheduled, the BOY may be as low as 32,000 AFY, which would require Rampdown to reduce the Operating Yield of the Basin so that it is equal to the BOY (and Sustainable Yield) of the Basin by the fall of 2039. In this case, the Judgment states that "following the first Basin Optimization Yield Study, Rampdown of the Operating Yield will commence in annual steps, if necessary" (Judgment §4.9.1.3).

The Baseline scenario includes 40,000 AFY of groundwater production for the Basin, as defined in the Judgment as the Initial Operating Yield. If BOP Projects 2 and 5 are not implemented as scheduled, this BOY Study report outlines two potential no-project Rampdown scenarios for the Watermaster to consider. The first is a Basin-wide Rampdown that reduces groundwater production by 20%, relative to the Baseline Scenario groundwater production of 40,000 AFY, in all management areas of the Basin (Sections 3.4.1 and 5.1).

The Judgment provides that a Differential Rampdown could be implemented that would result in "localized restrictions on extractions" (Judgment §4.10.3). This process includes, but is not limited to, committee consultation and a list of specific findings relative to the implementation of projects and the avoidance of undesirable results (Judgment §4.10.3.1). Although the process to implement a Differential Rampdown is more complex, this BOY Study finds that the Differential Rampdown approach avoids undesirable results while preserving higher overall groundwater production rates in the Basin.

Thus, the second no-project Rampdown scenario is a Differential Rampdown that reduces groundwater production in the ELPMA and Epworth Gravels Management Areas by 11%, relative to the Initial Operating Yield, and reduces groundwater production in the WLPMA by 20% relative to the Initial Operating Yield (Sections 3.4.2 and 5.2).

However, as noted above, Rampdown is unnecessary if BOP Projects 2 and 5 are implemented as scheduled.

LAS POSAS VALLEY WATERMASTER RESPONSE REPORT

Date: March 18, 2026

To: Las Posas Valley Watermaster Board of Directors

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

Re: Response Report to TAC Recommendation Report – Las Posas Valley Basin, Draft Basin Optimization Yield Study

The Las Posas Valley (LPV) Watermaster (Watermaster) requested consultation from the LPV Technical Advisory Committee (TAC) on the draft Basin Optimization Yield Study (BOY Study or BOYS). Watermaster's request was transmitted in a December 17, 2025, memorandum to TAC. Watermaster requested five previous TAC consultations regarding the BOY Study which guided preparation of the draft BOY Study:

- July 16, 2024, request for consultation on the BOY Study draft scope of work (August 27, 2024, TAC recommendation report)
- December 23, 2024, request for consultation on the BOY Study schedule (January 21, 2025, TAC recommendation report)
- January 7, 2025, presentation to TAC by Watermaster's consultant Dudek on the BOY Study modeling approach (January 21, 2025, TAC recommendation report)
- April 3, 2025, request for consultation on preferred modeling alternatives and impacts to schedule (May 9, 2025, TAC recommendation report)
- August 29, 2025, request for consultation on numerical modeling results (September 16, 2025, TAC recommendation report)

The TAC discussed and developed its recommendation report at its January 6, 2026, and January 20, 2026, regular meetings. TAC's February 3, 2026 (received February 9, 2026), recommendation report included ten recommendations and an attachment with 76 comments by each of the TAC members on specific sections of the draft BOY Study. Each of these recommendations is listed below followed by Watermaster response. Watermaster's responses to the 76 specific recommendations are included in the attached table. Watermaster appreciates TAC's prompt and thorough review of the draft BOY Study and recommendations.

RECOMMENDATION 1: Clarify How the Arroyo Simi-Las Posas Water Acquisition Project Was Simulated in the Model Scenarios

It is unclear how the Arroyo Simi-Las Posas water acquisition project (Basin Optimization Plan Project 5) was included in the various simulations. Please clarify in text and add a simple table that lists the amount of surface water that was simulated to enter the LPVB for each simulation. This is particularly important for the rampdown scenarios, which are described as being no-project scenarios. If they are no-project scenarios, please clarify that the current flows in the Arroyo Simi-Las Posas that Basin Optimization Plan Project 5 are intended to maintain were not included.

Response to Recommendation 1:

BOY Study text has been modified and a new table added to clarify the Simi Valley discharges used in the model simulations. As described in text and shown in draft BOY Study Table 3-1, the purpose

of the Arroyo Simi-Las Posas Water Acquisition project would be to maintain current upstream discharges to the Arroyo that flow into the LPV Basin. This project, if implemented, would ensure that the City of Simi Valley (City) would continue these discharges into the future. At the time of preparation of the LPV Groundwater Sustainability Plan (GSP), the City was considering diverting a portion of discharges from the Simi Valley Water Quality Control Plant (SVWQCP) and dewatering wells to produce additional recycled water for use in the Simi Valley Basin; however, the City subsequently indicated it had no near-term plan to decrease these discharges. Further, the City's 2020 Urban Water Management Plan, the most recently published Plan, does not project a significant increase in the production of recycled water in a 25-year planning horizon. Therefore, both the BOY Study Baseline and Project scenarios were simulated with the same volume of flows in the Arroyo entering the LPV Basin. This is consistent with the scenarios modeled in the First Periodic Evaluation of the GSP and Table 3-1 in the draft BOY Study which shows 0 acre-feet per year (AFY) increase in water supply over the current state if the project is implemented. Further, the consultation with TAC at the January 7, 2026, meeting on the planned modeling approach specifically identified that SVWQCP 2016 – 2022 average discharges of 8,040 AFY and 2016 – 2022 average dewatering well discharges of 1,318 AFY would be used for both the Baseline and Projects model scenarios. TAC's January 21, 2025, recommendation report regarding the BOY Study modeling approach did not contain any concerns or recommendations regarding the proposed Simi Valley discharges in the model scenarios.

RECOMMENDATION 2: Present Basin Optimization Yield and Rampdown Consistent with Judgment

The Judgment defines Basin Optimization Yield as the estimated yield projected to be available to achieve sustainable groundwater management by 2040 and rampdown as the deficit between the effective Operating Yield and the Basin Optimization Yield. The draft BOY Study references these definitions and identifies the Basin Optimization Yield as a groundwater production rate of 36,860 acre-feet per year (AFY), which includes implementation of Basin Optimization Projects and maintains sustainable groundwater conditions. However, the draft BOY Study then uses a different annual production rate to identify and define rampdown and rampdown rate. According to the Judgment, rampdown would therefore be 40,000 AFY minus 36,860 AFY, which is 3,140 AFY (current Operating Yield is 40,000 AFY and BOY Study calculated Basin Optimization Yield is 36,860 AFY).

This may point to a conflict within the Judgement. The reduction in pumping below the Operational Yield identified in the draft BOY Study as the Basin Optimization Yield applies only to those LPVB groundwater users who would receive project in lieu water deliveries. However, the Judgment requires rampdown to be applied to all groundwater users in the LPVB. The Judgment does not appear to contemplate a condition in which a no-project scenario results in rampdown, which is the context in which rampdown has been discussed and estimated in the draft BOY Study.

2.1 Additionally the Judgment requires that the Basin Optimization Yield be used by the Watermaster to allocate pumping to pumpers. If the Basin Optimization Yield identified in the BOY Study is used for this purpose, pumpers will not receive the correct annual allocations; it will be reduced by the volume of in lieu water delivered to the projects assessed in the BOY Study. Because the in lieu projects in the BOY Study offset some groundwater use, the volume

of water delivered for in lieu use should be included in the Basin Optimization Yield. Recommendations:

- Clarify how the Basin Optimization Yield with the in lieu projects will be used for future allocation determinations, and rampdown (which is assumed to be zero so long as projects are implemented).
- Explore and characterize how rampdown is being presented in the BOY Study in contrast to the definitions in the Judgment.
- Provide additional explanation for the context of including a no-project scenario and associated rampdown in the BOY Study. To avoid confusion, this explanation should differentiate between pumping reductions in the BOY Study and rampdown in the Judgment. This explanation should also inform the reader that uniform and differential pumping reductions are both presented for informational purposes only.

Response to Recommendation 2:
The draft BOY Study text lacked clarity regarding the Basin Optimization Yield; text has been revised for clarity. The Basin Optimization Yield under the Projects Scenario with implementation of both in-lieu projects is 40,000 AFY less the 3,140 AFY reductions by the in-lieu participants, for a net yield of 36,860 AFY for the remaining Water Right Holders. The in-lieu projects would consist of deliveries of 3,140 AFY of imported water from Calleguas MWD to Ventura County Waterworks Districts (VCWD) 1 and 19 and to Zone Mutual Water Company (MWC) to replace the 3,140 AFY these purveyors would otherwise pump. Participation by VCWD-1, VCWD-19, and Zone MWC, would be under the policy and terms to be established by Watermaster and agreements with the purveyors. Annual Allocation would be based on a Basin Optimization Yield of 40,000 AFY. Importantly, ongoing groundwater elevation monitoring will provide confirmation whether the projects are successful in raising groundwater levels above minimum thresholds at key wells in the Basin. Note that the Basin Optimization Yield will be re-evaluated in the 2030 BOY Study. BOY Study text has been revised to provide this clarification.

Regarding the two no-project Rampdown scenarios presented in the draft BOY Study, these were specifically requested for inclusion by the TAC in its September 16, 2025, recommendation report on BOY Study numerical modeling results; recommendation 5.1.1:

> Complete.iterative.simulations.in.both.management.areas.to.identify.the.amount.of. uniform. pumping. reduction. that. would. be. required. to. meet. sustainability. goals. without. implementing. any. new. projects¡. The. results. of. these. iterative. simulations. would. help. the. Watermaster. and. stakeholders. understand. the. effects. of. not. implementing.the.in_lieu.projects¡

BOY Study text has been updated to clarify the purpose of the two no-project Rampdown scenarios.

Following are responses to the bulleted comments in recommendation 2.1:

- Response to this comment is provided in the first paragraph above. BOY Study text has been updated to provide additional clarification.
- BOY Study text has been updated to provide additional clarification.
- BOY Study text has been updated to provide additional clarification.

RECOMMENDATION 3: Consider Addressing the Effects of the Somis Fault Model Boundary Condition on In Lieu and Rampdown Simulations

As noted in the draft BOY Study and raised by the TAC in previous recommendation reports, the Coastal Plain Model includes a boundary condition on the Somis fault that is inconsistent with the agreed-upon hydrogeologic conceptual model of the LPVB, the boundary condition in the East Las Posas Model, and the version of the Ventura Regional Groundwater Flow Model (VRGFM) that was used to develop the LPVB GSP. While the draft BOY Study indicates that the simulated in lieu and rampdown scenarios for the WLPMA are sustainable despite this issue with the Coastal Plain Model, it is possible that the volumes of water identified for in lieu delivery and reduced pumping in the projects and rampdown scenarios, respectively, exceed what would actually be required to achieve sustainable groundwater conditions in the WLPMA.

3.1 Recommendation:

Consider estimating the volumetric effect the inconsistent boundary condition has on the project and rampdown scenario simulations. This could allow the in lieu and rampdown volumes to be refined downward, reducing costs and impacts to WLPMA groundwater users.

Response to Recommendation 3:

A comparison of simulated groundwater level response in well 02N20W06R01 between the GSP Projects Scenario and the First Periodic Evaluation of the GSP Projects Scenario is provided in Figure 2-1 and discussed in section 2.2 of the draft BOY Study. This comparison was conducted between these two studies because the groundwater pumping distribution was similar, whereas the groundwater pumping distribution in the BOY Study model simulation was based on water-right allocations as discussed in section 3.2.2 of the draft BOY Study. This comparison showed that the simulated groundwater elevation response in the GSP was consistent with the observed groundwater elevation response to the 1994 to 2006 historical in-lieu program. Therefore, the historical program may provide a better guide to in-lieu program response in the WLPMA than the BOY Study Projects Scenario simulation. It should be noted that the in-lieu project does not require capital expenditure or planning for capital expenditure. Rather, this project simply requires annual purchases of imported water for use by purveyors in lieu of pumping groundwater. Ongoing groundwater elevation monitoring will provide direct evidence of the benefits of the in-lieu project and confirm whether groundwater elevations are above minimum thresholds. Annual in-lieu volumes can be adjusted as appropriate through adaptive management based on groundwater monitoring.

RECOMMENDATION 4: Clarify Existing and Projected Conditions in the Epworth Gravels Management Area

The information presented for the Epworth Gravels Management Area (EGMA) should be expanded to explain several factors. These include the presence of groundwater producers without allocations in the Judgment, the effects of recent pumping patterns on model simulations, and the need for rampdown in the management area if the Basin Optimization Plan projects are not implemented.

4.1 Recommendations:

- In section 3.2.3.1:
  - Provide more information and quantify or estimate how much pumping in the EGMA is not accounted for in the distribution of allocations in the Judgment.

  - Provide similar information for the other management areas or note the absence of pumpers without allocations in those management areas.
- Provide additional information regarding the effects of using water year 2024 pumping in the EGMA for the 47-year model period and how this will be accounted for in the Operating Yield for the management area and LPVB.
- Explain why the difference between the estimated sustainable yield and rampdown volumes were so large for the EGMA.
- Explain why EGMA pumping is reduced in the rampdown scenarios when the baseline production rate for the management area is already lower than the sustainable yield, as indicated on page 13 of the draft BOY Study.
- Provide additional discussion of the differential rampdown scenario results in the EGMA, specifically addressing continuing declines in groundwater levels shown on Figure 3-13.

Response to Recommendation 4:
The BOY Study text discusses issues related to model simulations for the Epworth Gravels Management Area. Forecasting extractions, and thus future groundwater conditions, in the Epworth Gravels aquifer is problematic, as the Epworth Gravels Management Area is fully contained within the ELPMA and many Water Right Holders within the Epworth Gravels Management Area have wells that extract from the Epworth Gravels aquifer and wells that extract from the underlying Fox Canyon and/or Grimes Canyon aquifers. The BOY Study simulations distributed pumping by Water Right Holders based on pumping reported for water year 2024, the first available year of reporting under the Judgment. Because these Water Right Holders may vary their pumping between the two aquifers year-to-year, the simulated future groundwater elevations should not be overly relied upon. Additionally, not all groundwater producers with wells in the Epworth Gravels Management Area received Water Right allocations in the Judgment. Text in the BOY Study has been expanded to include an estimate of the unauthorized extraction that may be occurring in the Epworth Gravels.

Following are responses to the bulleted comments in recommendation 4.1:

- Estimates of unauthorized pumping by operators without Water Right allocations has been added to the BOY Study for the management areas.
- Section 3.2.2 of the draft BOY Study contains a detailed explanation of the Baseline Scenario pumping distribution methodology. The methodology is based on the Annual Allocations distributed among multi-well and mutual-water-company exclusive and hybrid users based on the DWR water year 2024 pumping, the first full water year of water-use-reporting available post Judgment implementation. This methodology was presented to, and agreed with, by the TAC. Because the Epworth Gravels Management Area is wholly within the ELPMA, and because Water Right Holders typically extract from both the Epworth Gravels aquifer and the underlying Fox Canyon aquifer, it is recommended that the Operating Yields of the Epworth Gravels Management Area and ELPMA be managed together.
- As discussed above, the Operating Yield, and Rampdown, in the Epworth Gravels Management Area should be managed together with the ELPMA.
- As noted in Section 3.4.2.2, the hydrograph for the Epworth Gravels Management Area Key Well is in Appendix B, not shown in Figure 3-13.

RECOMMENDATION 5: Clarify How Pumping and Water Budget Changes Were Applied in Model Scenarios, Specifically with Respect to Temporal Variability in Pumping Volume and Distribution

It is not clear from the descriptions of model scenarios if pumping was held constant for every year of the simulation period for each scenario, or if pumping volume and/or distribution were varied during the simulation period.

While this comment and recommendation applies to all model simulations, it is particularly important for the rampdown scenarios. It is unclear whether pumping at the fully reduced rate was used for the entire rampdown simulation period or if pumping was reduced incrementally each year. If it is the former, the TAC questions whether rampdown will be effective in achieving sustainable groundwater conditions by 2040. As presented in the BOY Study, the model scenarios indicate that over the 47-year model period the annual groundwater production volumes pumped in the rampdown scenarios will achieve sustainability. However, the BOY Study does not appear to assess how long after reaching the rampdown pumping rate it will take for water levels to rise to the thresholds identified as sustainable. Prolonged pumping at rates in excess of the rampdown rate may result in water levels below the minimum thresholds in representative monitoring wells and it is not clear that one year of pumping at the rampdown rate at the end of the 14-year rampdown period will be sufficient to facilitate water level recovery.

5.1 Recommendations:

- Clarify how pumping and other water budget changes were applied in model scenarios, especially as it relates to rampdown rate implementation over time during the model period.
- Assuming the rampdown was assumed to have occurred before the start of each scenario and pumping during the entire model period was equal to the rampdown rate for the scenario, explain how long water level recovery to sustainable conditions may take after rampdown is complete.

Response to Recommendation 5:

Simulated groundwater production was constant for the duration of each modeling scenario from the start of the simulated model time period of October 2022. It is important to recognize that numerical groundwater models are more effective at simulating changes and trends in groundwater elevations than they are at forecasting absolute groundwater elevations. For this reason and given the known uncertainties in the models and especially uncertainties in the distribution of future groundwater extraction and future precipitation, trying to use the model simulations to predict specific groundwater elevations at a specific future year would be inappropriate. Rather, the BOY Study appropriately uses numerical groundwater model simulations to forecast groundwater elevation trends over time to evaluate whether a given pumping scenario may be sustainable. That said, review of simulated Baseline Scenario hydrographs (e.g., well 03N19W28N03S) suggests that significant delay of project implementation, or Rampdown if the projects are not implemented, could be a challenge to achieving sustainability by 2040. The model simulations provide the Watermaster Board with the best-available information for management actions; however, ongoing groundwater elevation monitoring will provide direct evidence and confirmation whether groundwater elevations are above, or trending to, minimum thresholds, to provide the Watermaster with the information needed for adaptive management.

RECOMMENDATION 6: Clearly Identify Assumptions Associated with Modeling and Other Analyses in the BOY Study

The TAC review identified some unstated assumptions in the modeling approach that should be included in the BOY Study. These include the assumption that modeled hydrology from the beginning of water year 2023 and current is consistent with actual conditions and that water in storage credited to Calleguas Municipal Water District will remain in storage. There may be other assumptions that are implicit in the modeling and other analyses in the BOY Study and these should be clearly identified and discussed in a dedicated section of the report.

6.1 Recommendations:

Clearly describe and explain the implications of assumptions in the modeling and other analyses in the BOY Study, including but not limited to the following:

- The difference between modeled and actual hydrology for the period from beginning of water year 2023 (October 2022) through the end of water year 2025 (September 2025) and briefly describe (qualitatively) the impact on interpretation of model results.
- The potential effects of recovery of water stored by Calleguas Municipal Water District on water levels, water budgets, and sustainable groundwater conditions.

Response to Recommendation 6:
A table has been added provide the water supply assumptions included in the modeling scenarios.

Following are responses to the bulleted comments in recommendation 6.1:

- Numerical groundwater models are most effective at simulating changes and trends in groundwater elevations rather than forecasting absolute groundwater elevations in any given year. The models use a synthetic forecast of precipitation based on historical precipitation for future hydrology, as described in section 3.1.2 of the draft BOY Study. Because actual precipitation since October 2022 naturally was different from the synthetic forecast, this affected groundwater elevations measured at some key wells. The hydrographs of the simulated future groundwater elevations were shifted to start at the most recent groundwater elevations measured in water year 2024. Explanation of this shift has been added to the BOY Study text.
- Calleguas MWD has represented that the water it has stored in the Basin is principally for an emergency when it loses access to imported water from the Metropolitan Water District of Southern California (MWD). Scenarios when this situation might occur such as a disruption in the Bay Delta or an earthquake that disrupts the supply line between MWD and Calleguas would likely be associated with a State-wide emergency situation. It is beyond the scope of the GSP or the BOY Study to include planning for such State-wide emergencies. Calleguas has represented that it would replenish stored water at the earliest opportunity when used for other purposes. Much more information about Calleguas' operations and plans will become public upon the completion of the Calleguas ASR Project Operation Plan which is required to be prepared by the Judgment. When the Operation Plan becomes available, consideration can be made as to how Calleguas' water-storage operation should be considered in the next 5-year BOY Study. The BOY Study text has been updated to explain the

assumption that the Calleguas MWD water will remain in storage in the Basin over the long term.

RECOMMENDATION 7: Discuss The Potential Effects of Carryover Water on Sustainable Management of the Basin

The methodology used to distribute pumping in the baseline and other model scenarios assumed that pumping was constant every year and that all active wells produced the same volume of groundwater every year. While this approach preserves the water balance and allows the model to show how hydrologic variability affects groundwater conditions, it does not allow for assessment of the impacts of highly variable changes in groundwater pumping dependent on those same hydrologic conditions. Recent groundwater use in the LPVB has been below the current Operational Yield of 40,000 AFY, which indicates that some water rights holders have been accumulating carryover water, which is common during wet years.

Subsequent use of carryover water in dry years has the potential to effect groundwater sustainability and should be discussed.

7.1 Recommendation:

Discuss the potential effects of carryover water on sustainable management in the LPVB in light of the scenarios simulated for the BOY Study.

Response to Recommendation 7:
TAC identifies Carryover as an important challenge to groundwater management in the Basin. As discussed in section 3.2.2 of the draft BOY Study, assumptions were made regarding the simulated future pumping distribution (with TAC consultation and concurrence) because the Judgment Water Right Allocations are significantly different than historical pumping patterns. Carryover use causes additional uncertainty. There will have been several years of pumping and potential Carryover use that will inform simulated future pumping in the next 5-year BOY Study. Text in the current BOY Study has been updated to qualitatively identify the uncertainty associated with future Carryover use.

RECOMMENDATION 8: Document and Discuss Uncertainties in the Model Results as They Relate to the Findings of the BOY Study

Uncertainty in model results is presented alongside some values in section 2.1 of the draft BOY Study but then not explored further when describing the project scenario simulations, Basin Optimization Yield, or rampdown scenarios. Adding discussion of uncertainty and contextualizing quantified uncertainty would help readers understand the confidence that should be placed on the projections for LPVB management based on model simulations.

8.1 Recommendations:

Show quantitative estimates of uncertainties for all model simulation results, similar to those presented in section 2.1 and discuss how uncertainty should be considered in relation to project scenarios, Basin Optimization Yield, and rampdown.

Response to Recommendation 8:
The BOY Study text has been updated to include quantitative and qualitative uncertainty in the discussion of the modeled scenarios. It is important to recognize the model simulations provide the Watermaster Board with the best-available information for management actions; however, ongoing groundwater elevation monitoring will provide direct evidence and confirmation whether groundwater elevations are above, or trending to, minimum thresholds, to provide the Watermaster with the information needed for adaptive management.

RECOMMENDATION 9: Review and Consider Significant Edits to Text Identified by TAC

There are significant text edits identified through the TAC review that should be considered by the Watermaster in preparation for finalizing the draft BOY Study. Specific recommendations are referenced below.

9.1 Recommendations:

[bullets have been replaced with letters for ease of reference in responses]

a. Consider reframing the executive summary and section 6 to highlight the positive outcome that rampdown won't be necessary if the two identified projects proceed in a timely fashion and that both project and rampdown implementation will have to be adaptive processes guided by monitoring data and the required 5-year updates to the BOY Study. Suggested text for some of the revisions to the Executive Summary has been provided by Dr. Abrams and is attached.
b. State in the BOY Study that simulated relative head changes are used and are deemed to be more reliable for comparing MTs to groundwater elevations. This is noted as a "shift" in hydrographs but should be more specific. Models are better at predicting head changes than they are at predicting actual heads. The second paragraph of section 1.3 might be a good place to include this information. Each instance of shifted hydrographs should also be identified in the text and on the relevant figures.
c. Revise text in section 2.2 to refer to boundary conditions and the Somis fault as a barrier to groundwater flow as indicated in comments BA-7, 8, 9, 10, and 12 in the attached tabular comments.
d. Consider including uncertainty in the presentation of sustainable yield in table 3-2 as a separate column where the uncertainty in the sustainable yield for each management area can be documented.
e. Reference the Coastal Plain model uncertainty and difference between groundwater elevation observations during past in lieu water use presented in sections 2.2 and 3.1.4 when discussing assessment of model simulation results for the WLPMA in comparison to sustainability metrics. The intent would be to remind readers that the model simulated conditions at well 02N20W06R01 do not align with historical observations and that in practice sustainability in this area of the LPVB will be assessed using monitoring data and adaptive project management.
f. Add explanatory text regarding the significant difference between the sustainable yield published in the First GSP Periodic Evaluation for the LPVB and the annual groundwater production rate identified in the basin-wide rampdown scenario.

g. Add a table or tables in section 4 that summarize the Baseline, BOY Project, Basin- wide Rampdown, Differential Rampdown, and Sustainable Yield estimates for each management area to assist the reader in understanding the differences between the scenarios.
h. Revise Conclusions to be consistent with changes to the Executive Summary and discuss all conclusions from the study. The existing Conclusions section is focused on the rampdown scenarios. All of the modeled scenarios should be discussed in this section along with reiterating that timely project implementation is shown to result in sustainable groundwater conditions without the need for basin-wide pumping reductions associated with rampdown. Suggested text for some of the revisions to the Conclusions was provided by Dr. Abrams and is attached. Also consider including a summary table of each scenario evaluated in the BOY Study in the conclusions to provide readers with context for the discussion of the conclusions.
i. Develop and include a recommendations section. While the Judgment may not specifically call for recommendations, it would be prudent to include a discussion recommendations identified by the BOY Study. This should include recommendations for the rapid development of the projects identified in the BOY Study along with creation of contingency plans in case the projects are delayed or not successfully implemented, as raised in section 4. Recommendations could also include data needs, model clarifications and/or updates, and other ongoing tasks that would be prudent to consider pursuing ahead of the next update of the BOY Study.

Response to Recommendation 9:
Following are responses to the bulleted comments in recommendation 9.1:

a. The Executive Summary and the Conclusions section of the BOY Study have been rewritten to clarify that modeling of the Projects Scenario suggests that Rampdown may not be needed if the projects are implemented in a timely manner, and the two Rampdown scenarios are included for informational purposes should the projects not be implemented. The text has been revised considering text suggestions provided by Dr. Abrams.
b. TAC correctly points out that numerical groundwater models are better at predicting changes and trends in simulated future groundwater elevations than they are in predicting actual future groundwater elevations. The BOY Study text has been updated to include discussion of the shifts in starting simulated groundwater elevation in hydrographs of certain key wells. Hydrographs have been revised with a note.
c. BOY Study text has been revised to address comments BA-7, 8, 9, 10, and 12, regarding the boundary condition in the Coastal Plain Model at the Somis Fault.
d. Table 3-2 has been updated to provide estimated uncertainty for the sustainable yield estimates of each management area.
e. Watermaster agrees with this recommendation. BOY Study text has been updated to clarify that model simulations in the vicinity of well 02N20W06R01do not align with historical observations and that in practice sustainability in this area of the LPVB will be assessed using monitoring data and adaptive project management.
f. BOY Study text has been updated to provide explanation as to the differences in sustainable yield estimates in the First Periodic Evaluation of the GSP and the BOY Study scenarios.
g. Text has been extensively revised for clarity rendering a table unnecessary.

h. The Conclusions section and Executive Summary have been revised based on TAC recommendations, TAC member comments, and Dr. Abrams' suggested text.
i. The TAC correctly points out that the Judgment does not call for a recommendations section and Watermaster does not believe adding a recommendations section is appropriate, especially the new recommendation by the TAC to create contingency plans. Watermaster notes that this newly recommended scope was not in the draft scope of work which was subject of a July 16, 2024, TAC consultation nor did TAC include recommendations for this additional scope of work in its August 27, 2024, recommendations report. That said, recommendations that are discussed in various sections of the BOY text have been summarized in the updated Conclusions section for easy reference.

RECOMMENDATION 10: Review Editorial Comments Provided by TAC in Tabulated Comment Matrix

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

10.1 Recommendations:

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

Response to Recommendation 10:
The BOY Study text was reviewed and revised where appropriate in response to TAC's recommendations. The text and tables of the BOY Study 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 Basin Optimization Yield Study

Comment ID	Topic	Page Number	Section ID	Quoted Text	Comment
BB-1	Clarification	5	2.1	*"CMWD no longer maintains the ELP Model but has provided this model to FCGMA to support management of the Basin."*	Calleguas has not made a decision to stop maintaining the model.
BB-2	Editorial	7	3.1.2	*"Of course, the exact future hydrology is unknown. Therefore, the synthetic future hydrology is a source of uncertainty in any future model simulations."*	Standalone sentence - should it be included in the prior paragraph?
BB-3	Editorial	12, 13, and 16	3.2.3.1 & Tables 3-2 and 3-3	*N/A*	Baseline groundwater production value for Epworth Gravels Mgmt. Area listed in text does not match value in Tables 3-2 and 3-3.
BB-4	Editorial	15 and 16	3.3.1 & Table 3-3	*N/A*	Groundwater production values for ELPMA and WLPMA listed in text do not match values in Table 3-3.
BB-5	Editorial	v	N/A	*Second paragraph, first sentence "...that provided quantifiable groundwater at a level of detail that could be included in the model."*	Groundwater what? Levels, flow, budgets?
BB-6	Analysis Assumptions	7	3.1.2	*N/A*	An unstated assumption of the modeling approach is that the modeled hydrology between 10/1/22 and now is identical to that which has actually occurred. Consider qualitatively describing the difference between modeled and actual hydrology for this period and briefly describe (qualitatively) the impact on interpretation of the results.
BB-7	Analysis Assumptions	8	3.1.3	*N/A*	An unstated assumption of the modeling approach is that water in storage credited to Calleguas MWD by FCGMA will remain in storage. Should this water be recovered, water levels would be lower than simulated and minimum thresholds may not be achieved. Consider describing this (qualitatively) for context.
BB-8	Clarification	v & 1	ES, 2nd paragraph & 1, 2nd paragraph	*N/A*	It is unclear how the Arroyo Simi-Las Posas water acquisition project (Basin Optimization Plan Project 5) was included in the various simulations. Please clarify in text and add a simple table that lists the amount of surface water that was simulated to enter the model domain via the SFR package from Simi Valley for each simulation.
BB-9	Epworth Gravels Mgmt. Area	Various	Various	*N/A*	It is stated on page 13 that the sustainable production rate for the Epworth Gravels Mgmt. Area is 1,320 AFY. The baseline Epworth Gravels Mgmt. Area extractions were less than this (1,024 AFY). Given this, please explain why the Epworth Gravels Mgmt. Area extractions were reduced in the rampdown scenarios. Please also caveat the rampdown to alert policymakers to the fact that it appears that Epworth Gravels Mgmt. Area rampdown does not appear necessary from a technical perspective.

Specific Comments from the Las Posas Valley Basin Technical Advisory Committee
Draft Basin Optimization Yield Study

Comment ID	Topic	Page Number	Section ID	Quoted Text	Comment
BB-10	Epworth Gravels Mgmt. Area	13	3.2.3.1	*"not all groundwater producers with wells in the Epworth Gravels Management Area received an allocation in the Judgment (Figure 3-4)."*	Two comments. (1) Estimates of Epworth Gravels Mgmt. Area extractions that are not included in the analysis should be provided (i.e. groundwater producers w/o a Judgment allocation) for context. This can be estimated from historical extractions reported to FCGMA. (2) Is the Epworth Gravels Management Area the only management area that has groundwater producers w/o a Judgment allocation? If no, estimates should also be provided for those management areas for context.
BB-11	Epworth Mgmt. Area Sustainable Yield vs. Rampdown Pumping	18	3.4.1.1	*"The estimated sustainable yields of the Epworth Gravels Management Area and the ELPMA were approximately 500 and 1,450 AFY higher, respectively, than the simulated groundwater production in the Basin-wide Rampdown scenario."*	This difference for Epworth Gravels Mgmt. Area is significant on a percentage basis. Text should be added to explain why this large of a difference exists.
BB-12	Projects and Rampdown	v and 26-27	ES and 6	*N/A*	Please add more text to remind the reader that implementation of either projects or rampdown would be an adaptive process that is guided by monitoring data and the required 5-year updates to this document.
BB-13	Rampdown Rate	N/A	5	*N/A*	It appears that the rampdown rates are based on an assumption that the amount of surface water entering ELPMA from Simi Valley will not change even if the Arroyo Simi-Las Posas water acquisition project (Basin Optimization Plan Project 5) is not executed. This should be made clear in the text and the rampdown rate should be caveated accordingly.
BB-14	Rampdown Rate	18	3.4.1.1	*N/A*	Please clarify how rampdown was simulated in the rampdown model scenarios. It is unclear whether pumping at that the fully reduced rate was used for the entire rampdown period or if pumping was reduced incrementally each year during the rampdown period. If it is the former, the results should be caveated because the model scenario may be underestimating pumping and the resulting simulated groundwater levels may be overestimated.
BB-15	Recommendations	N/A	N/A	*N/A*	There is no recommendations section. While the Judgment may not specifically call for recommendations, it would be prudent to include a discussion of data needs, model clarifications/updates, etc. that would be prudent to consider pursuing ahead of the next update of this document.
BB-16	Technical	16	3.3.2.1	*"Although the groundwater elevation at the third well, Well 02N20W06R01, remained below the minimum threshold during the Projects Scenario, the groundwater elevation at the end of the scenario was similar to the elevation at the start of the scenario. This suggests that if the initial groundwater elevation can be raised at this well, ongoing production at the rates simulated in the Projects Scenario will maintain the groundwater elevation in the future."*	This text is unclear. What is meant by "if the initial groundwater elevation can be raised at this well"? How would this initial groundwater level increase be achieved? Would it be more appropriate to say that the simulated groundwater elevations are close to the MT and that is reasonable to conclude that the MT could be achieved consistently when considering uncertainty in the WLPMA model?

Specific Comments from the Las Posas Valley Basin Technical Advisory Committee
Draft Basin Optimization Yield Study

Comment ID	Topic	Page Number	Section ID	Quoted Text	Comment
BB-17	WLPMA Sustainable Yield vs. Rampdown Pumping	18	3.4.1.1	*"The estimated sustainable yield of the WLPMA in the First Periodic Evaluation was approximately 3,300 AFY lower than the simulated groundwater production in the Basin-wide Rampdown scenario."*	This is significant difference. Text should be added to explain why this large of a difference exists.
TM-1	spell out abbreviation	1	1.1	*LPV Judgment*	first use of Las Posas Valley so spell out abbreviation - Las Posas Valley (LPV) Judgment
TM-2	spell out abbreviation	5	2	*ELP Model; a MODLFOW numerical model…*	first use of ELP - spell out
TM-3	model uncertainty	5	2.1	*uncertainty bounds in the sustainable yield …estimated using the ELP Model of ±2,300 AFY…*	the ±2,300 AFY uncertainty (on an ~18,000 AFY yield) is significant – on the order of 13% – which directly affects confidence in the BOY and rampdown values
TM-4	model uncertainty	6	2.1	*…uncertainty bounds in the sustainable yield for the WLPMA estimated using the GSP version of the VRGWFM of ±1,200 AFY …*	How is the model uncertainty considered in the analyses?
TM-5	sustainable yield uncertainty	22	4	*…model scenarios simulated for this BOY Study the Basin Optimization Yield is estimated to be 36,860 AFY if the in-lieu surface water delivery projects are implemented…*	How is the model uncertainty reflected in this value? Is it 36,860 AFY+/- the uncertainty?
TM-6	rampdowns	24	5.2	*…scenario groundwater production was reduced by 20% relative to the Baseline Scenario pumping in the WLPMA…*	It is recognized that the model used for WLPMA under predicts WLs for the Key Wells. If a 20% rampdown is needed per the model to ultimately get WLs above the MT, isn't it logical to assume that a lesser rampdown could achieve comparable results when the WLs are corrected for the under prediction tendencies of the model? It didn't seem like the underprediction was accounted for, at least semiquantitatively, in the analyses. Is the report suggesting a rampdown quantity that is too aggressive?

Specific Comments from the Las Posas Valley Basin Technical Advisory Committee
Draft Basin Optimization Yield Study

Comment ID	Topic	Page Number	Section ID	Quoted Text	Comment
TM-7	conclusions	26	6	*Conclusion*	why does the Conclusion section focus solely on the ramp-down scenarios? Per Section 1, *the BOY Study evaluates groundwater conditions under three potential future production scenarios: (1) continued production at 40,000 acre-feet per year (AFY), the initial Operating Yield defined in the Judgment, (2) implementation of two groundwater in-lieu projects evaluated in the Basin Optimization Plan (BOP), and (3) a ramp-down scenario to determine the BOY in the event that the projects are not implemented.. .* Discussions of all three scenarios should be included in the Conclusions. Isn't the major take-away message that if the in-lieu delivery projects can be implemented promptly, then ramp-downs are not likely to be needed? Don't bury (or omit) the lead message.
TM-8	conclusions	26	6		It would be useful to the reader to have a summary table for each of the scenarios evaluated in the report. There are lots of numbers in the document. A summary in the conclusions makes it easier to compare the scenario outcomes. Suggest a table (with supporting text) that lists for each key well when each scenario brings water levels above the MT, is the MT achieved before 2040, water level trends (up or down), do water level trends suggest that MO will be met, etc.
TM-9	possible typo	7	3.1.1	*The future scenarios developed for the BOY Study simulate groundwater conditions in the Basin over the 47-year...*	reference to a "37-year modeled period" for trends in section 3.4.2.2 – this appears to be a typo, since the scenarios run 47 years
TM-10	timing of project implementation	8	3.1.3	*Table 3-1*	Table 3-1 indicates Time Period for Implementation as "Water Year 2027", but does not specifically identify when in WY2027 the water deliveries were initiated in the model
TM-11	timing of project implementation	8	3.1.3	*...the in-lieu project deliveries are not currently occurring. If implementation of the in-lieu project is delayed for multiple years, the modeled impacts of the project on groundwater levels in this BOY Study may 'overestimate the impact of this project...*	since these projects depend on agencies outside the Watermaster's direct control, there is uncertainty in their yield and timing. The study already notes no agreements are signed yet. It might be prudent to recommend contingency planning (e.g., if by year X the projects are behind schedule, implement phased rampdowns to compensate). This is hinted in Section 4 (if Project 2 is not fully implemented, consider a Rampdown), which is a good inclusion.
TM-12	SGMA compliance	9	3.1.4	*...in the WLPMA, the long-term groundwater production rate was determined to be potentially sustainable if groundwater elevations remained stable over the future model period, such that the ending groundwater level was equal to or higher than the starting groundwater elevation."*	an additional criterion is used: a pumping rate is considered potentially sustainable if groundwater levels **stabilize or rise over the future period**, even if they start (and end) below the MT. It's important to highlight the risk of allowing "stable but below-threshold" conditions, even temporarily, technically means undesirable results (as defined in the GSP) persist until those levels rise above MT. The study implies that with projects or rampdown, those key wells might not reach MT by 2040 but could soon after.

Specific Comments from the Las Posas Valley Basin Technical Advisory Committee
Draft Basin Optimization Yield Study

Comment ID	Topic	Page Number	Section ID	Quoted Text	Comment
TM-13	Baseline Scenario extractions	10	3.2.2	*...the selected approach, with which the TAC concurred, was to distribute the Annual Allocation based on the reported pumping and MWC deliveries for DWR water year 2024...*	The distribution method ensures every drop of the 40,000 AFY is assigned to a specific well or MWC, preserving the water balance, and does so in a way that reflects current (2024) usage patterns. The model does not account for underutilization (which has occurred in the past couple of years) which results in carryover amounts that can have an as yet unmodeled impact on future water levels. The baseline scenario is logical, however, it would be useful to be more forthcoming with the shortcomings of the scenario assumptions as predictors of future conditions.
TM-14	modeling assumptions	10	3.2.2		The modeling approach could be more robust by accounting for the carryover amounts earned in the wet periods and their use in subsequent dry periods. For example, assume carryover was earned in "above normal wet years" at a rate consistent with GW use in recent wet years. The carryover would be used in dry years when irrigated water demand is greater than the average. It is not clear how this would impact efforts to bring GW levels above the MT, but it would offer a more likely scenario for how the basin would operate.
TM-15	estimated sustainable yield uncertainty	12	3.2.2.2	*Table 3-2 Estimated Sustainable Yield*	shouldn't the sustainable yield be +/- the uncertainty ? Suggest adding another column to show the possible range of the sustainable yield OR put the range in paretheses in the same cell as the Estimated Sustainable Yield. For example, WLPMA Estimated Sustainable Yield is 11,400 (10,200-12,600), ELPMA + EG is 19,230 (16,930-21,530). LPVB sustainable yield is 30,630 (27,137-34,130).
TM-16	in lieu amounts	17	3.2.2.2	*...the LAS groundwater production was reduced by 1,760 AFY to simulate implementation of the in-lieu surface water delivery project to Zone MWC and VCWWD 19."*	Is the in lieu delivery amount being overestimated because the WLPMA model under predicts WL responses to imported water? Could a lesser in lieu amount achieve the same result if the model's WLs were adjusted to account for the underprediction?
TM-17	possible typo	15	3.3.1	*The resulting groundwater production rates were 16,656 AFY in the WLPMA and 16,420 AFY in the ELPMA (Table 3-3).*	Table 3-3 shows ELPMA pumping as 19,179 AFY in the Projects scenario, but 16,420 AFY in text. Looks like the text should be changed to 19,179 AFY which is consistent with modeled ~7% reduction. Similar for WLPMA - Table 3-3 shows 16,657 AFY, text says 16,656 AFY– likely typo.
TM-18	estimated sustainable yield uncertainty	16	3.3.1	*Table 3-3*	how is model uncertainty accounted for in this table?

Specific Comments from the Las Posas Valley Basin Technical Advisory Committee
Draft Basin Optimization Yield Study

Comment ID	Topic	Page Number	Section ID	Quoted Text	Comment
TM-19	SGMA compliance	16	3.3.2	*...if the initial groundwater elevation can be raised at this well, ongoing production at the rates simulated in the Projects Scenario will maintain the groundwater elevation in the future.*	WLPMA meets the softer criterion (stable levels at the problematic well). From a hydrogeologic standpoint, the in-lieu deliveries clearly mitigate drawdown in the targeted areas. It just flags one gap - one location still below threshold, requiring either trust in model correction of flow across Somis fault or additional management.
TM-20	SGMA compliance	19	3.4.1.2	*In the WLPMA, simulated groundwater elevations remained above the minimum threshold groundwater elevation at two of three Key Wells...*	The 20% reduction predicted water levels would remain below the MT in one Key Well. So, a 20% reduction is not actually consistent with SGMA goals of avoiding undesirable results. It is unknown if this "modified approach" to SGMA compliance is acceptable to DWR. Report states that model response is "...dampened relative to historical observations" therefore, groundwater elevations in this well are expected to be above the MT. What happens to the groundwater elevations in the other key wells if we account for the "dampened response"? Are we suggesting that a rampdown of some amount less that 20% is adequate if the dampened response is accounted for? If so, why not present the model results for that lower value? Does the use of a 20% rampdown put unnecessarily stringent cuts on ELPMA & Epworth?
TM-21	rampdowns	20	3.4.2.1	*...it should be noted that simulated groundwater elevations exhibited a declining trend over the 37-year modeled period."*	under the 11% cut, ELPMA is still *mildly overdrafting* , which is consistent with the note that water levels in ELPMA show a declining trend over the 47-year simulation (albeit all above MT). Is the declining trend over the SGMA compliance timeframe consistent with SGMA compliance requirements?
TM-22	add PVB, LPV, ELP, WMID to list of abbreviations	iii			
TM-23	Somis fault/model boundaries				The WLPMA model has assigned properties to the Somis fault that are inconsistent with current hydrogeologic understanding. Before the next BOYS or Periodic Evaluation update, it is recommended that the model be updated to reflect our hydrogeologic conceptual model. This allows the forward forecasts to be used without having to consider the "dampened results" correction factor.
BA-1	Setting the tone of the report (that the report presents good news)	v	Executive Summary		Overall, the BOYS study and report present good news that rampdown won't be necessary if the two projects proceed in a timely fashion. Suggest revising the Executive Summary to highlight this and support better understanding of terms in the Judgment, such Operating Yield, etc. Please see accompanying Word file that presents my suggested revisions.

Specific Comments from the Las Posas Valley Basin Technical Advisory Committee
Draft Basin Optimization Yield Study

Comment ID	Topic	Page Number	Section ID	Quoted Text	Comment
BA-2	Conforming main text to suggested revised Executive Summary	v	Executive Summary		Left to Dudek to revise main text to hit the highlights noted in the suggested revised Executive Summary
BA-3	Delete unneeded comma	3	1.3	*Undesirable results were defined in the GSP for the three management areas of the Basin: the East Las Posas Management Area (ELPMA), the Epworth Gravels Management Area, and the West Las Posas Management Area (WLPMA)* , *(FCGMA 2019).*	Delete identified comma (in red)
BA-4	Use of modeled heads for MT metric versus head changes (i.e., the "shift" used in hydrographs)	3	1.3	*Because the MTs are the metric by which groundwater conditions in the Basin are determined to be sustainable, the BOY Study compares simulated future groundwater elevations in the Basin to the MTs at the Key Wells in the Basin. Future groundwater elevations were simulated using the two numerical groundwater models that cover the three management areas of the Basin. Simulated production rates that result in long-term stability of the groundwater elevations at levels above the MTs are considered sustainable. The Basin Optimization Yield is the production rate, with implementation of the Basin Optimization Projects that can be reasonably implemented by 2040 and maintains groundwater elevations above the MTs.*	Somewhere in the main text it should be stated that simulated relative head changes are used to compare to MTs for groundwater elevations. This is noted as a "shift" in hydrographs, but should be more specific. Models are better at predicting head changes than they are at predicting actual heads. This paragraph might be a good place to do that.
BA-5	Inconsistent use of acronyms	5	2	*Coastal Plain Model: a version of the Ventura Regional Groundwater Flow Model (VRGFM) MODFLOW numerical model developed and maintained by UWCD, which covers the entirety of the WLPMA, Oxnard Subbasin, PVB, and Mound Subbasin (UWCD 2018).*	Ventura Regional Groundwater Flow Model is sometimes abbreviated as VRGFM and sometimes as VRGWFM. Be consistent.
BA-6	Delete unneeded word	5	2	*Therefore, the only change FCGMA made to the model for the First Periodic Evaluation was to extend the simulation time period through the end of water year 2022 (i.e., September 30, 2022) (FCGMA 2024*	Delete the word "time" (in red)
BA-7	Model "boundary" and modeled "boundary condition" are not the same thing and cannot be used interchangeably	6	2.2	*Although the Coastal Plain Model included improved hydrogeologic conceptual model data in several groundwater basins, the update also included a revision to the model boundary at the eastern edge of the WLPMA.*	Revise to: Although the Coastal Plain Model included improved hydrogeologic conceptual model data in several groundwater basins, the update also included a revision to the model boundary condition at the eastern edge of the WLPMA.
BA-8	Somis Fault is observed to be a flow barrier; should emphasize that this is an observation and not a model phenomenon	6	2.2	*In previous versions of the model, the boundary between the ELPMA and WLPMA was represented using a no-flow boundary condition, which is consistent with the Somis Fault acting as a barrier to groundwater flow between the two management areas (FCGMA 2019).*	Revise to: In previous versions of the model, the boundary between the ELPMA and WLPMA was represented using a no-flow boundary condition, which is consistent with the observation that the Somis Fault acts as a barrier to groundwater flow between the two management areas (FCGMA 2019).

Specific Comments from the Las Posas Valley Basin Technical Advisory Committee
Draft Basin Optimization Yield Study

Comment ID	Topic	Page Number	Section ID	Quoted Text	Comment
BA-9	Model "boundary" and modeled "boundary condition" are not the same thing and cannot be used interchangeably	6	2.2	*In contrast, the model boundary in the version of the model used in the First Periodic Evaluation and in this BOY Study is a general head boundary condition ...*	Insert the word "condition" as indicated in red. THERE ARE also two other instances in the next paragraph to insert the word "condition." One is noted in next comment along with suggested change in wording.
BA-10	Model "boundary" and modeled "boundary condition" are not the same thing and cannot be used interchangeably, and clarification	6	2.2	*...simulated groundwater elevations do not rise as rapidly in response to reduced groundwater production as they would if the model boundary were a no-flow boundary.*	Revise to: ...simulated groundwater elevations do not rise as rapidly in response to reduced groundwater production as they would if the model boundary condition had not been changed from a no-flow boundary to a general head boundary. ~~they would if the model boundary~~
BA-11	Missing or extra words	6	2.2	*This rise is similar to that measured in the historical data between 1994 and 2006, when CMWD was delivering imported water in-lieu groundwater delivery to WLPMA*	Revise to: This rise is similar to that measured in the historical data between 1994 and 2006, when CMWD was delivering imported water in lieu of local groundwater pumping to the ~~r in-lieu groundwater delivery to~~ WLPMA
BA-12	Model "boundary" and modeled "boundary condition" are not the same thing and cannot be used interchangeably, and clarification	7	2.2	*The comparison of the observed historical change in groundwater elevation to the modeled change in groundwater elevation indicates that the model boundary change has introduced additional uncertainty into the predictive capabilities of the model in this region. Future work should be conducted to reduce this uncertainty by recalibrating the revised model using a no-flow boundary to better represent the hydrogeologic conceptual model of this area.*	Revise to: The comparison of the observed historical change in groundwater elevation to the modeled change in groundwater elevation indicates that UWCD's change to the model boundary condition between the WLPMA and ELPMA ~~model boundary change~~ has introduced errors and additional uncertainty into the predictive capabilities of the model in this region. Future work should be conducted to fix this error and reduce this uncertainty by recalibrating the revised model using a no-flow boundary condition to ~~better~~ represent the hydrogeologic conceptual model of this area.
BA-13	Grammer	7	2.2	*Watermaster and TAC agreed that, while the change in the model boundary is not consistent with the hydrogeologic conceptual model, groundwater management decisions will be based on observed water levels, rather than model simulation .*	Change to "simulations"
BA-14	Run-on sentence	7	2.2	*Because the UWCD model is capable of simulating groundwater elevations in the eastern portion of the WLPMA that rise above the minimum threshold prior to 2040 and remain above the minimum threshold from 2040 to 2070, use of the UWCD model files developed for the Periodic Evaluation remains the best available option to evaluate the BOY and complete this first BOY study prior to the beginning of the 2027 water year (October 1 2026 – September 30, 2027) (FCGMA 2025b).*	Change to: The UWCD model is capable of simulating groundwater elevations in the eastern portion of the WLPMA that rise above the minimum threshold prior to 2040 and remain above the minimum threshold from 2040 to 2070. Thus, the use of the UWCD model files developed for the Periodic Evaluation remains the best available option to evaluate the BOY and complete this first BOY study prior to the beginning of the 2027 water year (October 1, 2026 – September 30, 2027) (FCGMA 2025b)

Specific Comments from the Las Posas Valley Basin Technical Advisory Committee
Draft Basin Optimization Yield Study

Comment ID	Topic	Page Number	Section ID	Quoted Text	Comment
BA-15	Needs additional clarification	8	3.1.3	*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).*	Need a statement as to why this water can't continue without purchasing or leasing.
BA-16	Needs additional clarification	10	3.1.4	*However, the updated Coastal Plain Model did not reproduce the same magnitude of groundwater elevation response as was observed historically (Figure 2-1). Therefore, project implementation and adjustment through groundwater elevation monitoring are expected to bring groundwater elevations back above the MT. Once the groundwater elevations are higher than the MT, a long-term production rate that results in stable groundwater elevations that remain above the MT is sufficient to avoid undesirable results.*	Revise to: However, the updated Coastal Plain Model did not reproduce the same magnitude of groundwater elevation response as was observed historically (Figure 2-1). Therefore, project implementation and adjustment of in-lieu delivery rates driven by ~~through~~ groundwater elevation monitoring are expected to bring groundwater elevations back above the MT. Once the groundwater elevations are higher than the MT, a long-term production rate can be determined that results in stable groundwater elevations that remain above the MT is sufficient to avoid undesirable results.
BA-17	Needs additional clarification	10	3.1.4	*Based on these results, a simulated groundwater flux of 800 AFY or less across the boundary between Oxnard Subbasin and the WLPMA was considered sustainable in this BOY Study.*	Which direction? Should state.
BA-18	Grammer	10	3.2.1	*Additionally, some agricultural properties that historically reported extractions did not receive allocation.*	Insert the word "an": Additionally, some agricultural properties that historically reported extractions did not receive an allocation.
BA-19	Terminology	10	3.2.1	*Because the BOY Study is intended to assess the ability of projects to maintain the BOY at as close to 40,000 AFY as possible, and to evaluate the need for a Rampdown relative to the Basin Optimization Yield, this BOY Study used the Water Year 2024 Annual Allocations published by the Watermaster as the basis for extractions in the numerical groundwater models.*	Revise to: Because the 2025 BOY Study is intended to assess the ability of projects to maintain the BOY at as close to 40,000 AFY as possible, and to evaluate the need for a Rampdown relative to the Initial Operating ~~Basin Optimization~~ Yield, this BOY Study used the Water Year 2024 Annual Allocations published by the Watermaster as the basis for extractions in the numerical groundwater models
BA-20	Wording	12	3.2.2.2	*The differences between the Baseline Scenario production rate and the average groundwater production from water years 2016 to 2024 are shown in Figure 3-4.*	Should state explicitly if these differences are increases or decreases, here and on Figure 3-4. e.g., text could say increases and decreases are shown on Figure 3-4. Figure legend could indicate which ranges equate to increases and which to decreases.
BA-21	Clarification	13	3.2.3.1	*If, during water year 2024, these Water Right Holders pumped less than average from the Epworth Gravels Management Area wells, the baseline pumping distribution in the BOY Study Baseline Scenario would extrapolate this single year of reduced pumping over the entire 47-year model time period. The result is continuously rising simulated groundwater elevations that do not reflect the historical production patterns from the aquifer.*	There should be some kind of text explaining that this is unavoidable and HOW THIS WILL be accounted for in the Operating Yield/

Specific Comments from the Las Posas Valley Basin Technical Advisory Committee
Draft Basin Optimization Yield Study

Comment ID	Topic	Page Number	Section ID	Quoted Text	Comment
BA-22	Clarification	13	3.2.3.1	*Groundwater production at the Baseline Scenario rates was determined not to be sustainable in the ELPMA because simulated groundwater elevations at five Key Wells fell below the minimum threshold groundwater during the 47-year model run (Figure 3-6).*	Were these simulated hydrographs also shifted, as in Figure 3-5. If so there should be a note on the figure. Also, I think you need to say somewhere in the main text that you have more faith in simulated groundwater changes, than simply the simulated elevations.
BA-23	Clarification	15	3.3.1	*As discussed in Section 3.1.3, the Projects Scenario incorporated 1,760 AFY of surface water deliveries to offset groundwater production from six wells in the eastern WLPMA, and 1,380 AFY of surface water deliveries to offset production from three wells in the ELPMA.*	Which six wells? Which three wells?
BA-24	Interpretation of the Judgment	18	3.4.1.1	*The total extraction rate for the Basin-wide Rampdown Scenario was 32,000 AFY (Table 3-3).*	However, the Rampdown should be the Initial Operating Yield minus the BOY, or 40,000 acre-feet per year (AFY) minus 36,860 AFY. Accordingly, the Rampdown should be 3,140 AF, or approximately 224 AFY over the 14-year period between now and 2040. Further, my understanding is that the Judgment does not contemplate a no-project Rampdown or Rampdown Rate.
BA-25	Clarification	24	5.1	*Consistent with the Judgment, this initial BOY Study calculates a Rampdown Rate for a Basin-wide reduction in groundwater pumping if the projects are not implemented. The Rampdown Rate is the annual reduction in groundwater necessary to have the Operating Yield equal the Sustainable Yield by the fall of 2039 (Judgment §§1.89 and 4.10.1.4).*	Insert the word "production" as indicated in red: Consistent with the Judgment, this initial BOY Study calculates a Rampdown Rate for a Basin-wide reduction in groundwater pumping if the projects are not implemented. The Rampdown Rate is the annual reduction in groundwater production necessary to have the Operating Yield equal the Sustainable Yield by the fall of 2039 (Judgment §§1.89 and 4.10.1.4).
BA-26	Interpretation of the Judgment	24	5.1		As noted above, the Rampdown should be the Initial Operating Yield minus the BOY, or 40,000 acre-feet per year (AFY) minus 36,860 AFY. Accordingly, the Rampdown should be 3,140 AF, or approximately 224 AFY over the 14-year period between now and 2040. Further, my understanding is that the Judgment does not contemplate a no-project Rampdown or Rampdown Rate.
BA-27	Clarification	26	6		Suggest revising conclusions based on the suggested revisions to the Executive Summary. Please see accompanying Word file that presents my suggested revisions to the Conclusions section.
CT-1	Error	3	1.3	*The Rampdown was calculated over a 13-year period…*	The rampdown period is identified as 14 years in other sections.
CT-2	Missing footnote/endnote	3	1.3	*…(DWR water year 2027 through water year 2039 [1])…*	There is no footnote or endnote corresponding to the note identified in the second to last paragraph on page 3.
CT-3	missplaced word	13	3.2.3.1	*The simulated groundwater elevation declines in the northern ELPMA are consistent with previous model scenarios evaluated in for the GSP …*	Remove the unnecessary *for* in the last sentence of the last paragraph on the page.
CT-4	Inconsistent values	15-16	3.3.1	*The resulting groundwater production rates were 16,656 AFY in the WLPMA and 16,420 AFY in the ElPMA (Table 3-3)*	The values referenced in this text don't match those in Table 3-3

Specific Comments from the Las Posas Valley Basin Technical Advisory Committee
Draft Basin Optimization Yield Study

Comment ID	Topic	Page Number	Section ID	Quoted Text	Comment
CT-5	Rampdown and water budget	19	3.4.1.3	*…inflows exceed outflows by approximately 500 AFY in the Basin-wide Rampdown Scenario.*	Could the rampdown volume and rate for the WLPMA have been reduced if the simulation of pumping reduction resulted in a closer correlation of inflow and outflow? Was the difference between inflow and outflow necessary to recover from historical water level declines.
CT-6	Inconsistent values	20	3.4.2.2	*…however, it should be note that simulated groundwater elevations exhibited a declining trend over the 37-year model period.*	In other sections of the report the model period is identified as 47 years.
CT-7	Add comparison / compilation tables	22	4		Consider adding a table or tables in section 4 that summarize the Baseline, BOY Project, Basin-wide Rampdown, Differential Rampdown, and Sustainable Yield estimates for each management area to assist the reader in understanding the differences between the scenarios.
CT-8	Expand explanation	24	5.1		Consider expanding the explanation of the rampdown period. As presented lay readers may not understand how the period from the fall of 2026 through the fall of 2039 equates to 14 years and is the appropriate denominator for calculating the rampdown period.
CT-9	Rampdown period and sustainable conditions	24-25	5		It is not clear in Section 5 how water levels, which are the metric the BOY Study identifies will be used for assessing sustainability, are expected to react to the rampdown period. The model scenarios appear to indicate that over a 47 year period the annual groundwater production volumes pumped in the rampdown scenarios will achieve sustainability. However, the BOY Study does not appear to assess how long after reaching the rampdown pumping rate it will take for water levels to rise to the thresholds identified as sustainable. One assumes that prolonged pumping at rates in excess of the rampdown rate will result in water levels below the minimum thresholds in representative monitoring wells and it is not clear that one year of pumping at the rampdown rate at the end of the 14 year rampdown period will be sufficient to facilitate water level recovery.

April 22, 2026

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

SUBJECT: Continued Hearing on Green Hills Ranch Well Drilling Permit Application [LPV Watermaster] – *(Returning Item)*

RECOMMENDATIONS: (1) Conduct continued hearing on Green Hills Ranch Well Drilling Permit Application; **(2)** Approve the Green Hills Ranch Well Drilling Permit Application subject to specified conditions.

BACKGROUND

On February 3, 2025, Pacific Coast Well Drilling, Inc. (Pacific Coast), on behalf of Green Hills Ranch, LLC (Green Hills), sent a Notification of Intent to Drill a New/Replacement Well (the Notification) to Fox Canyon Groundwater Management Agency (FCGMA) and other surrounding well owners, initiating the new well drilling review process included in the Judgment entered in *Las Posas Valley Water Rights Coalition, et al. v. Fox Canyon Groundwater Management Agency, et al.,* Santa Barbara Sup. Ct. Case No. VENC100509700 (Judgment). Under the Judgment, surrounding well owners that receive such notification may, within 60 days of receiving the notification, submit a written protest to FCGMA, which was appointed to serve as Watermaster for the Las Posas Valley Groundwater Basin (LPV Basin). If a well owner receiving such a notification submits a written protest or Watermaster, believes the new well will cause a Material Injury or an Undesirable Result, as defined in the Judgment, at least one public hearing will be scheduled where the parties may present oral and documentary evidence. Until Watermaster approves the new well, groundwater extraction from the proposed new well is prohibited. On April 3, 2025, and April 4, 2025, FCGMA received written protests in response to the Notification from the City of San Buenaventura (the City) and Del Norte Water Company (DNWC), respectively. These protests claim that the new well proposed in the Notification will or may cause a Material Injury and an Undesirable Result.

A public hearing, as required by the Judgment, was conducted on January 28, 2026, but was not completed and your Board did not render a decision on Green Hills application. Accordingly, the hearing was continued to afford each party the opportunity to present closing statements. Since January 2026, the parties, including Watermaster, have held a

series of meetings since that time to work through, and attempt to agree on, conditions of approval for the subject well permit.

DISCUSSION

The Judgment provides that a permit for a new or replacement well may be denied where said well will cause either a "Material Injury" or produce Undesirable Results. In reviewing well drilling applications under the Judgment, and especially in those cases where a hearing is conducted, it is incumbent upon your Board to determine if these conditions exist and there is cause under the Judgment for denying the application for a new or a replacement well. In pertinent part, the Judgment defines Material Injury to mean:

> "*A material and unreasonable impact to the Basin, any Management Area, Water Rights Holder, Party, well or water supply caused by the Extraction, storage, or Transfer of Groundwater in the Basin. Material Injury does not include economic injury that results from other than direct physical causes, including any adverse effect on water rates, lease rates, or demand for water. If fully mitigated, Material Injury shall no longer be considered to be occurring. Topics that may be considered in an analysis for a Material Injury determination include the following: (i) groundwater levels; (ii) groundwater in storage; (iii) groundwater quality; (iv) land subsidence; (v) natural recharge; and (vi) minimum thresholds and measurable objectives as set forth in SGMA and implementing regulations.*" (Judgment, § 1.64.)

During the January 28th, 2026, hearing, Watermaster stated that based on the available technical evidence, the projected drawdown due to operation of the new Green Hills well is unlikely to cause Material Injury or Undesirable Results. Although staff's analysis does not include the additional effects of multiple wells pumping simultaneously or complex geologic controls such as faulting and variable stratigraphy, the estimated drawdown falls within the range of normal operational fluctuations and is not expected to impair nearby wells or create long-term adverse conditions. More specifically, the potential interference at the City's Saticoy Country Club Well #3, under the range of normal operating conditions considered, was determined to be in the range of very slight to nearly undetectable. The interference at DNWC's well No.10 (also known as the "domestic well") was somewhat larger, but not within any range that Watermaster found to be unreasonable and was not viewed as likely to produce Material Injury. Since this original analysis was completed, new evidence has shown that there is a substantial likelihood that DNWC's well No. 10, due to the collapse of the lower approx. 200 feet of casing, is now screened in a different aquifer than the proposed Green Hills well, further reducing any potential for material and unreasonable interference. Watermaster also found that this DNWC well was in a degraded condition and would likely require substantial repair and upgrade, or replacement, in the foreseeable future.

A review of basin conditions has not found undesirable results such as land subsidence, chronic lowering of groundwater levels, or loss of water in storage occurring in this part of the basin, and this new well is not anticipated to alter that assessment.

Importantly, in the conditions proposed, Watermaster maintains the ability to respond if impacts are observed.

RECOMMENDED CONDITIONS OF APPROVAL

Although the drawdown evaluation performed by Watermaster staff indicates the proposed well is unlikely to cause unreasonable material injury under the assumed pumping scenario, uncertainty remains due to natural aquifer heterogeneity, the potential for interference from other pumping, and the fact that the well has not yet been drilled and screened. In addition, known faulting in the area adds uncertainty as geologic structures can affect groundwater movement, hydraulic connection between wells, and the extent of localized drawdown. Therefore, as a precaution, Watermaster staff recommends that the well permit be approved with a material injury response condition requiring Green Hills to implement operational changes if adverse groundwater conditions develop.

The proposed conditions of approval, as discussed amongst the parties, are as follows:

Fox Canyon Groundwater Management Agency, in its capacity as Watermaster under the Judgment (Watermaster), requires compliance with the following permit conditions. The proposed new well (located at Center Road, Somis, California) is subject to these permit conditions to address the uncertainty of, for example, the likelihood of causing Material Injury, natural aquifer heterogeneity, the potential for interference from other pumping, and the fact that the well has not yet been drilled and screened. In addition, known faulting in the area adds uncertainty as geologic structures can affect groundwater movement, hydraulic connection between wells, and the extent of localized drawdown. Watermaster recognizes that Green Hills Ranch's ability to drill and operate the proposed new well should not be limited based on effects that are not caused by Green Hills Ranch's drilling and operation of the new well. These conditions are further intended to ensure consistency with the Judgment and with Article X, section 2 of the California Constitution which requires reasonable and beneficial use of water, and which prevents the unreasonable or wasteful use of water.

The new, proposed well cannot pump more than the 338.16 acre-feet per year (AFY), which is equal to Green Hills Ranch's allocation under the Judgment, meaning that Green Hills Ranch cannot pump from the proposed well any more water than Green Hills Ranch has been allocated under the Judgment. The new, proposed well cannot pump at a continuous rate (measured as the average gallons per minute (GPM) over a period of two hours or longer) higher than 900 GPM. Green Hills Ranch understands that while the proposed new well may be drilled to accommodate higher pumping rates and extraction amounts, higher pumping rates and extraction amounts are not permitted.

Green Hills Ranch shall provide Del Norte Water Company, the City of San Buenaventura, and Watermaster with at least seventy-two (72) hours advance notice of: (i) commencement of drilling; (ii) construction of the well; and (iii) pumping tests upon well completion. Green Hills Ranch also shall provide all contractor and hydrogeologist notes, including geophysical surveys documenting the aquifer electrical resistivity signatures (i.e., e-log) through which the new well is drilled, measurements of groundwater discharge rates, and well responses to pumping stresses (water level data) that occur during these phases of well development and production testing.

If, following any of these notices or exchanges of information, a party determines that the drilling or operation of Green Hills Ranch's new well is or is likely to cause Material Injury (hereinafter "New Well Effects"), such party experiencing New Well Effects (hereinafter "Affected Party") shall notify Green Hills Ranch and Watermaster within thirty (30) days of learning of the New Well Effects. Green Hills Ranch shall meet and confer with both the Affected Party and Watermaster to develop measures to mitigate Material Injury.

In addition, Green Hills Ranch will provide Del Norte Water Company, City of San Buenaventura, and Watermaster with a final well design drawing after drilling of the pilot hole and before construction of the well.

Following well completion, for a period of three (3) years, each respective party shall conduct monthly groundwater level monitoring at the City of San Buenaventura's Saticoy Country Club Well #3 (SWN 02N21W08L03S), Del Norte Water Company's Well No. 10 (SWN 02N21W09D02), and Green Hills Ranch's new well (once completed), and provide those results to Watermaster. Continuous electronic monitoring data, such as from a transducer or similar system, is an acceptable measurement. Watermaster shall also conduct quarterly groundwater level monitoring at SWN 02N21W08H03S, which is located 650 ft southwest of the new, proposed well and is completed primarily in the Fox Canyon Aquifer. Watermaster shall report groundwater levels to Green Hills Ranch, City of San Buenaventura, and Del Norte Water Company. After the initial 3-year period, Watermaster shall conduct or receive quarterly groundwater level monitoring of SWN 02N21W08L03S, SWN 02N21W09D02, Green Hills Ranch's new well, and SWN 02N21W08H03S and report groundwater levels to Green Hills Ranch, City of San Buenaventura, and Del Norte Water Company. The parties reserve all rights to pursue recourse under the Judgment and as otherwise may be available under California law should the reported groundwater levels, at any time, indicate that the Green Hills Ranch well is causing Material Injury, Undesirable Results, or otherwise harming groundwater rights or groundwater levels.

Green Hills Ranch shall record a Notice of these Permit Conditions in the official real property records of the County of Ventura. Such recorded notice shall reference this permit by number and date, incorporate or attach all conditions of this permit, and identify the subject property by legal description and parcel identification number.

The conditions of the permit shall constitute covenants running with the land and shall be binding upon Green Hills Ranch and all heirs, successors, assigns, lessees, licensees, and subsequent owners of the subject property, regardless of whether such subsequent parties were signatories to the well permit and these conditions. All obligations, restrictions, and requirements imposed by the permit and these conditions shall survive any transfer, conveyance, or change in ownership of the subject property and/or well and shall remain in full force and effect until formally released in writing by the Watermaster. Watermaster shall provide thirty (30) days advance written notice to Del Norte Water Company and City of San Buenaventura of its intention to amend any of these permit conditions, or to release any obligation, restriction or requirement of Green Hills Ranch or any successor or assign.

Finally, Watermaster staff recommends including the following standard permit conditions in any approval of Green Hills application:

- No additional planting (other than acreage planted prior to June 30, 1988, as set forth and described in the well permit) in the Outcrop or Expansion area is prohibited for source water quality protection, and no irrigation may occur in the Outcrop or Expansion area.
- The groundwater well is to be registered with the FCGMA within 30 days of completion of drilling activities.
- Operation of the well must comply with the Las Posas Valley Judgement and FCGMA Ordinance Code, including as may be amended.
- No groundwater is to be exported outside of the Las Posas Valley Groundwater basin boundary.
- Groundwater extractions from the groundwater well shall be measured with a calibrated flowmeter and reported monthly via advanced metering infrastructure (AMI).
- Irrigation systems shall incorporate irrigation best management practices consistent with current industry standards.
- The groundwater well shall be constructed with a sounding tube having a minimum diameter of 1.5 inches.
- The permit is subject to all terms in the Judgment, including any subsequent amendments to the Judgment that may be adopted by the Court.

CONCLUSION:
While both protests raise potentially legitimate concerns regarding well interference and cumulative basin conditions, the record does not establish that the magnitude, duration, or spatial extent of predicted drawdown rises to the level of “material and unreasonable” impact required to support a finding of Material Injury. The predicted impacts are localized, operational in nature, and consistent with confined aquifer behavior observed in the basin under comparable pumping conditions. The record does not demonstrate that operation of the proposed well would result in basin-scale Undesirable Results, including chronic lowering of groundwater levels, significant and unreasonable reduction of groundwater storage, seawater intrusion, degraded water quality, or land subsidence.

While Watermaster staff’s technical evaluation indicates that material injury is unlikely under the assumed pumping conditions, some potential for injury remains due to natural aquifer variability, nearby faulting, and the inherent uncertainty associated with a proposed well that has not yet been constructed nor operated. However, with the recommended permit conditions, including clear guidance to monitor for and address any unanticipated impacts, Watermaster staff is satisfied that the new Green Hills groundwater well will not cause Material Injury or Undesirable Results.

Watermaster staff notes that despite numerous meetings to discuss well permit approval conditions and multiple draft versions of the conditions, DNWC has indicated that they are

not in agreement with the above permit conditions and will continue to object to the well permit. The City is satisfied that the permit conditions provide adequate protection of their water rights and their well operations and has indicated that they will no longer object if these conditions are made part of the Green Hills permit approval.

This letter has been reviewed by Agency Counsel. If you have any questions, please contact me at (805) 650-4083.

Sincerely,

John Demers
Executive Officer

Attachments:

Exhibit 18A - DNWC Closing Statement, dated April 17, 2026

To review all materials from the public hearing conducted Wednesday, January 28, 2026, select the Item Attachments tab at the following URL: https://ventura.primegov.com/portal/item?id=282816.

To review Exhibits entered into evidence and ordered accordingly during the public hearing conducted January 28, 2026, review the evidence package at the following URL: https://ventura.primegov.com/viewer/preview?id=384809&uid=e7ad650d-5d3a-44c6-9f10-4fabaa08ecfc&type=2.

White Brenner LLP

whitebrennerllp.com

1608 T Street
Sacramento, CA 95811
T 916.468.0950 | F 916.468.0951

Barbara A. Brenner
T: 916.468.0625
Barbara@whitebrennerllp.com

April 17, 2026

VIA E-MAIL ONLY

Las Posas Valley Groundwater Basin Watermaster
c/o Fox Canyon Groundwater Management Agency
800 South Victoria Avenue
Ventura, CA 93009
LPV.Watermaster@ventura.org

Re.: Del Norte Water Company's Comments on Proposed Conditions for Green Hills Ranch, LLC Application to Drill a New or Replacement Well

Dear Watermaster,

Del Norte Water Company ("DNWC") provides this statement in advance of the April 22, 2026, continued public hearing to address the well permit application ("Application") submitted by Pacific Coast Well Drilling, Inc. on behalf of Green Hills Ranch, LLC ("Applicant"). DNWC appreciates the Watermaster's efforts in reviewing the Application and identifying conditions necessary to address the impact of the new well. However, despite the conditions now being proposed for the Application, DNWC continues to have grave concerns regarding the new well's impact on DNWC's Well No. 10 ("Well 10"), especially given the remaining uncertainty of the aquifer type underlying the westernmost portion of the Las Posas Valley Groundwater Basin ("Basin").

I. Key Facts

The Applicant seeks to drill the proposed new well just a few hundred feet from DNWC's Well 10. Well 10 is the only well that meets the requirements for domestic supply under the State Water Resources Control Board Division of Drinking Water (DDW). The only other well able to produce domestic supply is DNWC Well No. 12, which is located one mile from the proposed new well site and only permitted to operate for five consecutive days, or fourteen days total per calendar year, and only in the event Well 10 is interrupted. **Other than these two wells, there is no domestic water source for approximately 84 homes within DNWC's service area and Mesa Union School.** As such, any material injury to Well 10 will have significant impact on customers who rely on it to meet their household water needs. (See attached Letter of Concern from DDW dated March 3, 2026.)

Historically, the Applicant uses an average of approximately 220 AFY of water supplied by DNWC. The Applicant's Allocation Basis under the Judgment[1] is 338 AFY. However, the proposed new well is currently conditioned to allow for a pumping rate of up to 900 gallons per minute for 2-hour intervals. There clearly exists a potential for Applicant to extract far greater amounts than its current allocation. By comparison, Well 10 historically only pumps about 25-30 AFY.

Given these figures alone, it is highly likely that the proposed new well will have a major impact on DNWC's customers' drinking water supply.[2]

In addition to these concerns about the new well's impact on DNWC, the review process for the Application, as the first to be reviewed under the Judgment, raises concerns regarding the fairness of the process being implemented for the administration of the Judgment. The Watermaster serves in a semi-adjudicatory role in implementing and enforcing the Judgment. As such, the procedure associated with review of the Application requires a level of formality to ensure the parties have a chance to be fairly heard. The process followed here only provided a fair hearing once the public hearing on January 28, 2026, was continued for additional discussion.

II. Background

On February 3, 2025, the Application was submitted to the Watermaster and provided to surrounding well owners, including DNWC. On April 4, 2025, DNWC submitted a protest to the Application pursuant to Section 4.14 of the Judgment ("Protest Letter"). As set forth in the Protest Letter, the proposed well constitutes a new well in the Basin that could cause "Material Injury or an Undesirable Result" to DNWC and the Basin as a whole. The Application and DNWC's protest remained pending for several months.

On September 12, 2025, Applicant's counsel sent a letter directly to the Watermaster's Technical Advisory Committee ("TAC") requesting that the TAC "issue a recommendation to the Watermaster on objections that Green Hills' permitted well […] would result in a material injury or undesirable result pursuant to Section 4.14 of the Judgment." Applicant's counsel included two technical reports with his letter. The reports did not address the concerns raised in DNWC's Protest Letter.

On November 8, 2025, Watermaster responded to Applicant's request for a TAC recommendation. In its letter, Watermaster confirmed that it "has not referred these issues to TAC for recommendation, and Watermaster does not, at this time, require TAC's review and analysis of the matters presented in Green Hills' letter." Watermaster further stated that "at this time, TAC should take no action in response to Green Hills' letter. Watermaster is

[1] "Judgment" refers to the Final Judgment entered on or about July 10, 2023, in the Las Posas Valley groundwater adjudication, Santa Barbara County Superior Court Case No. VENCI00509700.
[2] Moreover, the proposed new well's impacts on DNWC nearest agricultural well, Well No. 14, could also be significant.

reviewing Green Hills' application, and the protests received in response and will contact TAC if Watermaster determines technical recommendations are needed."

On November 18, 2025, Applicant's counsel responded to Watermaster concluding with, "[i]f Watermaster does [not] set a hearing date by December 12, 2025, my client will ask the court for an order directing the Watermaster to determine that my client's well will not cause a material injury." After discussion with Applicant's counsel and Watermaster's counsel, the public hearing was set for January 28, 2026. The discussions related to setting the public hearing included a briefing schedule for the protestants and the Applicant. While the parties agreed to the briefing schedule, they did not agree to the release of the Watermaster's recommendation, including potential conditions on the Application, less than 72 hours before the hearing.

Nevertheless, the public hearing was conducted on January 28, 2026. The Watermaster elected to continue the public hearing to allow the parties, including the Applicant, DNWC, and the City of San Buenaventura to address several of the issues raised in the hearing and identify potential additional conditions for the Application.

III. Remaining Concerns with the Proposed Conditions

To determine that the Application is "unlikely to cause unreasonable material injury," the Watermaster relied on the "regional basin studies (UCWD Model documentation) and publicly available well testing data."[3] The Watermaster's technical analysis also acknowledges that there is a disagreement between the Watermaster and DNWC's expert as to the nature of the aquifer underlying the westernmost portion of the Basin.[4] Specifically, while the Watermaster assumes the aquifer is semi-confined, DNWC's expert concludes that the area functions as a closed aquifer. This disagreement gives rise to two fundamental problems with the Watermaster's analysis: (1) reliance on the UCWD Model is not supported; and (2) treating the aquifer as closed materially changes the method for calculating the impact of the new well. Because the analytical approach to understanding the impact of the Applicant's new well does not accept that the aquifer is closed, the proposed conditions do not proactively address potential impacts on Well 10.

First, reliance on the UCWD model is unsupported. The Watermaster's own TAC has expressed concerns with regard to that model. In its proposed recommendations on the Basin Optimization Yield Study, the TAC notes that the Somis Fault boundary does not conform with the "agreed upon hydrogeologic conceptualization and observed conditions" of the Basin because it models that groundwater leaves across the fault, but in practice water remains in the western portion of the Basin. TAC's comments on the UCWD Model have been provided to the Watermaster. Accordingly, Watermaster staff should not simply

[3] FCGMA Board Meeting, January 28, 2026, Item 17 Green Hills Ranch Well Permitting Public Hearing, Appendix A.
[4] *Ibid.*

rely on the UCWD Model when it comes to the West Las Posas Basin characteristics. There is no justification for assuming the West Las Posas Basin is semi-confined or leaky. The proper assumption is that it is a confined basin, especially in the area that the Applicant is proposing to drill a well.

Second, because the aquifer is closed, the Theis equation is the appropriate method for quantifying drawdown and interference. The Theis equation is the accepted scientific and engineering standard for confined or effectively closed conditions. When properly applied here, the results are unambiguous: drawdown increases over time, does not stabilize, and accumulates. DNWC's domestic well is therefore likely to suffer material injury as a result of the proposed new well.

Despite these disagreements related to the underlying scientific approach to evaluating whether a material injury may result from the Application, the proposed conditions take a wait and see approach. They do not take proactive measures to avoid a material injury to DNWC. Instead, the conditions call for monitoring and dissemination of information, along with meet and confer efforts to address any impacts on DNWC's Well 10. DNWC respectfully requests the addition of conditions that provide for, among other measures, the following:

1. The cessation of pumping of Applicant's new, proposed well where a material injury is shown based on the data that must be provided to the Watermaster, DNWC, and the City of San Buenaventura under the proposed conditions for the Application until improvements on any impacted well are completed.
2. Specific mitigation measures to address any material injury from the new, proposed well under the Application be incorporated into the proposed conditions, including:
    a. The Applicant provide for the design and installation of well improvements necessary to minimize or eliminate any interference from the Applicant's new, proposed well.
    b. The Applicant reimburse any affected well owner's costs associated with (i) operation of an existing well during periods of reduced groundwater levels, (ii) cost of improvements or modification of any facilities necessary to address any interference, and (iii) lost water production capacity or increased operating expenses on an ongoing basis until interference from Applicant's new, proposed well is resolved.

IV. The Judgment and this Hearing Process Lacked Clear Procedure

The Application is the first to be considered under Section 4.14 of the Judgment. The language of the section provides that the Applicant, "may construct a new well provided that such new well does not cause a Material Injury or an Undesirable Result." It goes on to state that when the Watermaster receives a protest to a new well application, as it did here, the Watermaster must conduct a public hearing and receive oral and documentary evidence

related to the application.[5] The Judgment does not provide any further instruction related to the public hearing process for a new or replacement well application that receives protests.

Rather than establishing a clear process by adopting rules for the hearing at the outset of this Application process, the Watermaster relied on negotiated solutions to provide the parties with an opportunity to present their arguments and evidence. However, these negotiated solutions failed to establish the burden of proof related to whether Material Injury or Undesirable Result will occur as a consequence of the new or replacement well and did not address the timeframes associated with the review and discussion of the Watermaster's recommendations. Both issues have clear and significant impacts on the party's opportunity to be fairly heard at the public hearing.

Under the Judgment, the Watermaster is appointed as "the Court's special master" to "assist the Court in the administration of this Judgment."[6] The Watermaster is charged with the duty to "act in an impartial manner without favor or prejudice to any Party."[7] Therefore, the Watermaster is acting in a semi-adjudicatory role when administering the Judgment and is considering concerns of individual parties involved in the decision before it, not just the impact of the decision on the Basin as whole as was repeatedly suggested in this instance.

Given the semi-adjudicatory nature of this public hearing, the burden of proof is an integral element of the hearing. Accordingly, DNWC has raised the issue throughout the review and public hearing process without any response from the Watermaster. As DNWC has previously explained, Section 4.14 should be interpreted to find that the burden of demonstrating that a Material Injury or Undesirable Result will not result from the new well is the Applicant's because to interpret the Judgment's requirements otherwise results in absurdity. The Applicant is the one with the information necessary to determine whether the new well will result in a Material Injury or Undesirable Result. A protestor is not the party seeking an entitlement from the Watermaster nor is a protestor the party with the information required to determine the extent of a new well's impacts on neighboring wells and the Basin as a whole.

Thus, the Watermaster should define a clear hearing process that provides both procedural rules and the standard of review for all future public hearings related to a new or replacement well application. This will ensure that time-consuming and costly processes such as the one here are not repeated in the future. It will also ensure that the Watermaster is exercising its authority under the Judgment in an impartial manner.

///

///

---

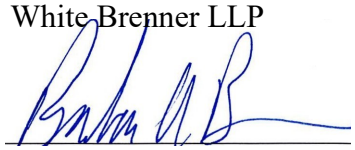
[5] Judgment, § 4.14.
[6] Judgment, § 5.1.
[7] Judgment, § 5.1.

V. Conclusion

Thank you for the opportunity to provide a written closing statement related to the Application, DNWC's protest, and the Watermaster's ongoing time and attention to the proposed conditions for the new well. DNWC respectfully requests that the Watermaster impose additional conditions on the new well proposed by the Applicant to ensure that any Material Injury from Applicant's proposed new well are addressed effectively. DNWC further requests that the Watermaster establish a formal process for the review of future new or replacement well applications, that includes a determination of which party, applicant or protestant, carries the burden of proof related to whether a well application will cause Material Injury or Undesirable Results. DNWC reserves all rights to pursue all remedies to address its concerns with regard to the Application.

Cordially,

White Brenner LLP



Barbara A. Brenner
KAF/prb

Attachment A – March 6, 2026 Letter of Concern from State Water Resources Control Board Division of Drinking Water

Cc: Del Norte Water Company
Elizabeth Ewens, Counsel for Las Posas Valley Watermaster
Brian Hamilton, Counsel for Green Hills Ranch, LLC
Alison Toivola, Counsel for City of San Buenaventura
Miles Hogan, Counsel for City of San Buenaventura

CALIFORNIA Water Boards

GAVIN NEWSOM
GOVERNOR

YANA GARCIA
SECRETARY FOR
ENVIRONMENTAL PROTECTION

State Water Resources Control Board
Division of Drinking Water

March 3, 2026

Del Norte Mutual Water Company
10814 Telephone Road
Ventura, CA 93004

Attention: David Vanoni, Manager

Dear Mr. Vanoni:

Thank you for sharing your concerns with the Division of Drinking Water (DDW) regarding the proposed construction of a groundwater well by Green Hills Ranch, LLC, which is near Del Norte Mutual Water Company's (Water System) Well #10. DDW has reviewed a report, dated April 3, 2025, written by Hopkins Groundwater Consultants which describes concerns related to the proposed new well and the potential to negatively impact the Water System's short-term and long-term water production from Well #10. DDW also reviewed the Las Posas Valley Basin Watermaster's technical review of the proposed well which states, despite some uncertainty, the projected drawdown is not expected to impair the nearby well's historic production.

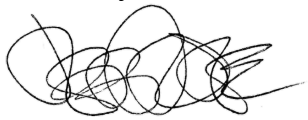
The Division of Drinking Water is the regulatory agency that oversees the Water System's ability to reliably and consistently deliver potable water to its customers. The Water System serves drinking water to 85 service connections which includes Mesa Union School, a public K-8 school serving approximately 663 students.

The water system has one active drinking water well, Well #10, and one standby source, Well #12 to supply all their customers' domestic water needs. Use of standby sources is restricted to 5 consecutive days or 14 total days in a calendar year. Therefore, the Water System is mainly reliant on the production capabilities of Well #10 to maintain domestic water service to its customers. DDW is concerned about the proposed well's potential to impact the Water System's production from Well #10. Furthermore, Well #10 has a nitrate concentration of 7.6 mg/L which is approximately 80% of the maximum contaminant level (MCL) of 10 mg/L. Nitrates above 10 mg/L have acute health impacts so DDW is also concerned about the potential impacts lower pumping water levels may have on nitrate concentrations in the Water System's only active domestic water supply.

In summary, because Well #10 is the Water System's only active source of drinking water for its customers, DDW is concerned with the proposed project due to its potential to impact its production capacity. The reports DDW reviewed mostly addressed the project's impacts on the suitability of the water for irrigation but didn't address the potential for the project to impact nitrate concentrations in the drinking water system. DDW is concerned that this hasn't been addressed. If nitrates exceed the MCL in Del Norte's only active drinking water well, residents will be told not to drink the water until treatment, or another source which meets the nitrate standard, is brought online.

Thank you for sharing your concerns with DDW. If you have any questions regarding this letter, please contact Jeff Densmore at (805) 566-9021 or jeff.densmore@waterboards.ca.gov

Sincerely,



Jeff Densmore, P.E.
Supervising Water Resource Control Engineer
State Water Resources Control Board
Division of Drinking Water – Section 4

cc: Jason Cunningham, P.E. – DDW District Engineer

FOX CANYON GROUNDWATER MANAGEMENT AGENCY

DIRECTORS

Eugene F. West (Chair) – Small Water Districts (805) 657-2121 *(Term Exp 2-28-27)*
Executive Committee, Fiscal Committee

Kelly Long (Vice Chair) – Ventura County Board of Supervisors (805) 654-2276 *(Term Exp 2-28-27)*
Executive Committee

Tony Trembley – Five Cities (805) 388-5307 *(Term Exp 2-28-28)*
Fiscal Committee, Flynn Award Selection Subcommittee

Richard Cavaletto – Farming Interests (805) 674-3969 *(Term Exp 2-28-28)*
Operations Committee

Lynn Maulhardt – United Water Conservation District (805) 982-0780 *(Term Exp 2-28-27)*
Operations Committee, Flynn Award Selection Subcommittee

ALTERNATE DIRECTORS

Reddy Pakala – Small Water Districts (805) 990-6809 *(Term Exp 2-28-27)*

Vianey Lopez – Ventura County Board of Supervisors (805) 654-2613 *(Term Exp 2-28-27)*

Bert Perello – Five Cities (805) 240-6194 *(Term Exp 2-28-28)*

Vacant – Farming Interests (805) N/A *(Term Exp 2-28-28)*

Keith Ford – UWCD (805) 207-9062 *(Term Exp 2-28-27)*

STAFF

John Demers – Executive Officer (805) 650-4083

Jason Canger – Agency Counsel (805) 654-2879

Farai Kaseke – Assistant Groundwater Manager II (805) 654-2954

Arne Anselm – Groundwater Specialist Ret. PT (805) 654-3942

Kathleen Riedel – Groundwater Specialist Ret. PT (805) 654-2064

Robert Hampson – Groundwater Specialist (805) 654-3952

Kathy Jones – Staff Services Specialist (805) 645-1372

Cynthia Rodriguez – Administrative Assistant (805) 662-6831

Erin Ware – Administrative Assistant (805) 654-2032

Fatima Perez – Management Assistant (805) 650-4073

Kylen Wooley – Water Resources Compliance Specialist (805) 658-4374

Briana Barajas – Water Resources Specialist (805) 654-2021

Elka Weber – Clerk of the Board (805) 654-2014