

Item 26, Exhibit 26D – PAC Recommendation Report Letter (August 16, 2024)

Gene West, Chair
Las Posas Valley Watermaster
800 S. Victoria Ave.
Ventura, CA 93009

August 16, 2024

Re: PAC Recommendation Report concerning Del Norte Protest

Chair West:

At its August 1 and 15, 2024 meetings, the PAC discussed the Del Norte basin assessment protest letters submitted for committee consultation by Watermaster staff July 17, 2024.

The PAC understands Del Norte's position to be that United Water Conservation District (UWCD) provides sufficient basin management to protect and maintain Del Norte's pumping capacity, and that no activity on the part of the Watermaster, administrative or otherwise, can benefit Del Norte in any way that is not duplicative of UWCD activities. As such, as matter of equity, Del Norte believes it should not pay any basin assessment.

After much discussion, two central questions presented themselves to the PAC:

1. Where does Del Norte's water come from? That is, how much of the water produced at their wells comes from UWCD's recharge efforts and how much from other basin inflows?
2. What is the generalized benefit to the Del Norte service area of being in the Las Posas Valley Basin and party to the Judgment? That is, can the benefit accrued to Del Norte's wells of Watermaster activity be quantified? And, if so, what would that value be?

There are clearly policy aspects to the second question, but there are hydrogeological aspects to it, as well, and the PAC determined that without a technical foundation, it cannot develop any policy recommendations for the Watermaster.

As such, at this juncture, the PAC recommends, per Section 6.4 of the Judgment, that Watermaster assign this issue to TAC for review. Once a TAC recommendation report has been developed and returned to the PAC, the PAC can discuss the policy implications and develop a recommendation report to the Watermaster regarding the Del Norte protest.

Thank you for the opportunity to weigh in on this important matter of equity.

Sincerely,



Ian Prichard, Chair, LPV Watermaster PAC