

# PACHOWICZ | GOLDENRING

## A Professional Law Corporation

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September 22, 2023

Via Email [jeff.pratt@ventura.org](mailto:jeff.pratt@ventura.org)  
Mr. Jeff Pratt, Executive Officer  
Fox Canyon Groundwater Management Agency  
800 South Victoria Avenue  
Ventura, California 93009-1610

Re: FCGMA Board Agenda Meeting September 27, 2023  
Items 5, 6, and 8  
Grimes Rock, Inc./Saticoy Properties, LLC

Dear Jeff:

I just received the published Agenda on the above referenced. It appears that implementation of the Judgment in the water rights litigation for the Las Posas Basin is being presented with a staff recommendation around implementation. I also note you have presented two letters to the Board, one of which is on the topic of implementation from the O'Melveny firm.

However, what I do not see in any of the Agenda items, either by staff discussion or presentation, nor in your presentation to the Board as Executive Officer, is the issue concerning the allocation to Grimes Rock, Inc./Saticoy Properties, LLC. These have been the subject of several correspondences to you requesting a meeting to address concerns and the effective singling out of our clients to a reduction from the Judgment allocated amount of 180 acre feet of water per year to 130 acre feet of water per year. This is, respectfully, simply improper not just under the Judgment and contract principles, but under a whole host of other bases which have been presented to you and your staff in various filings.

Prior to the currently scheduled meeting of September 27 on behalf of our clients we again request a meeting. We also request that the Agenda and presentations relative to the Agenda accurately reflect the concerns we have expressed on behalf of our clients and document the presentation of the correspondence as well as the lack of response from FCGMA staff. In a word, unlike agriculture which is, as you testified in your deposition, "generally okay" even under the current existing FCMGA Ordinance, with some minor tweaking, our clients are crammed down by almost 40% and that just does not work.

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Mr. Jeff Pratt, Executive Officer  
September 22, 2023  
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Please let me know if you are available for a conversation and I am happy to come to your office. I also ask that this correspondence and the prior letters written to you and FCGMA on this topic dated July 25, September 12, September 13, and September 15, (copies of which are enclosed) be provided to the Board and confirmed as being provided pursuant to an amended Agenda for purposes of the Administrative Record.

Thank you for your continuing professional courtesy and attention to this matter.

Very truly yours,

PACHOWICZ | GOLDENRING  
A Professional Law Corporation

A handwritten signature in black ink, appearing to read "Peter A. Goldenring", followed by a circled monogram "EG".

By: PETER A. GOLDENRING

PAG/sah

Enclosures: July 25, September 12, September 13, and September 15 correspondences

cc: Alberto Boada (via email w/enclosures)

Eugene West, Chair (via email w/enclosures)