

1 least the following information: (a) summary of the MC’s activities; (b) fiscal report of the
2 preceding year’s operations, including revenue and expenditures; (c) the general condition of the
3 Fishery and the Watershed as compared to Baseline Conditions; (d) a summary of Plan elements
4 implemented in the preceding year; (e) production reports for the Watershed; (f) evaluation of any
5 notices of New Production; and (g) any other information necessary to assess implementation of
6 the Physical Solution and to comply with the requirements of the Management Plan. The Annual
7 Report shall be prepared, considered by the MC and filed with the Court in accordance with
8 Section 7.7.4.9.3 below.

9
10 **7.7.4.9.2 Long Term Reporting**

11 The Technical Advisor shall prepare and file at the end of the Initial Implementation
12 Phase, a report with long-term monitoring trends and a comprehensive evaluation of the
13 Watershed. Subsequent state of the Watershed long term reports shall be filed as to be
14 determined by the MC (“**Long Term Report**”). The Long Term Reports shall be prepared,
15 considered by the MC, and filed with the Court in accordance with Section 7.7.4.9.3 below.

16
17 **7.7.4.9.3 Filing of Reports**

18 The Technical Advisor shall prepare and file the Annual Report or Long Term Report
19 (collectively, “**Status Reports**”), whichever is applicable, with the Court each year, on a date to
20 be determined by the MC, beginning with an Annual Report to be filed on or after July 1
21 following the first full year after entry of this Physical Solution. Prior to filing a Status Report
22 with the Court, the MC shall provide written notice to all Bound Parties that a draft of the Status
23 Report is available for review and make the Status Report available on a web site available to all
24 Bound Parties. The MC shall provide written notice to all Bound Parties of a public hearing to
25 receive comments and recommendations for changes in the Status Report. The public hearing
26 shall be conducted pursuant to rules and regulations promulgated by the MC. The notice of
27 public hearing may include such summary of the draft Status Report as the MC may deem
28

1 appropriate. The Status Reports shall consider annual reports filed under SGMA for that year
2 pursuant to Water Code section 10728.

3
4 **7.7.5 Removal of the MC**

5
6 The Court retains and reserves full jurisdiction, power, and authority to remove the MC,
7 or any individual representative serving on the MC, for good cause, and to substitute a new MC
8 or representative in its place, upon its own motion or upon motion of any Bound Party in
9 accordance with the notice and hearing procedures set forth in Section 7.7.6 of this Physical
10 Solution. The Court shall find good cause upon a showing that the MC or representative has: (1)
11 failed to exercise its powers or perform its duties; (2) performed its powers in a biased manner; or
12 (3) otherwise failed to act in a manner consistent with the provisions in this Physical Solution or
13 subsequent order of the Court.

14
15 **7.7.6 Court Review of MC Actions**

16
17 Any action, decision, rule, regulation, or procedure of the MC or the Technical Advisor
18 pursuant to this Physical Solution shall be subject to review by the Court on its own motion or on
19 the timely motion by any Bound Party as follows:

20
21 **7.7.6.1 Effective Date of MC Action**

22 Any order, decision or action of MC or Technical Advisor pursuant to this Physical
23 Solution shall be deemed to have occurred on the date of the order, decision or action.

24
25 **7.7.6.2 Notice of Motion**

26 Any Bound Party may move the Court for review of an action or decision pursuant to this
27 Physical Solution by way of noticed motion, upon at least 30 days' notice thereof. The motion
28 shall be served on all Bound Parties and the MC and Technical Advisor. Unless ordered by the

1 Court on its own motion or by request by a Bound Party, any such petition shall not operate to
2 stay the effect of any action or decision which is challenged. To have standing to bring such a
3 motion, a Bound Party must have participated in the proceedings of the MC regarding the order,
4 decision or action in question or make an adequate showing as to why such participating was
5 impractical or futile.

6
7 **7.7.6.3 Time for Motion**

8 A Bound Party must file a motion to review any action or decision within ninety (90) days
9 after such action or decision, except that motions for review of assessments hereunder shall be
10 filed within thirty (30) days of MC mailing notice of the assessment.

11
12 **7.7.6.4 Standard of Review**

13 The Court's review of any legal determinations of the MC, including but not limited to
14 interpretations of this Physical Solution, shall be *de novo*. The factual determinations of the MC
15 shall be reviewed under a substantial evidence standard, provided, however, that any factual
16 determinations that involve or affect a Bound Party's vested fundamental rights, directly or
17 otherwise, shall be reviewed *de novo*. For the purpose of this Physical Solution, such vested
18 fundamental rights shall include the rights to produce, divert, receive, or use water.

19
20 **7.7.6.5 Decision**

21 The decision of the Court in such proceeding shall be an appealable supplemental order in
22 this case. When the Court's decision is final, it shall be binding upon the MC and the Bound
23 Parties.

24
25 **7.7.7 Notice re MC Actions**

26
27 Before taking certain actions, to be enumerated in the rules and regulations, including but
28 not limited to adopting the Plan, amending the Plan, adopting assessments, and adopting rules and

1 regulations, the MC shall provide thirty (30) days advance notice of its proposed action by
2 posting notice on its website and electronically serving notice on the MC's notice list maintained
3 pursuant to section 7.7.3.6. Bound Parties may provide comments on the proposed MC action
4 within fifteen (15) days, and the MC shall consider the comments provided by Bound Parties
5 within that time period before taking the proposed action of which the MC gave notice.

6
7 **7.8 Dispute Resolution**

8 Except as discussed herein, all disputes arising under this Physical Solution, including
9 those related to the condition of the Fishery, initially shall be submitted to the MC for resolution
10 in accordance with this section. Any Bound Party may file a written request with the MC to hold
11 a hearing on a dispute. Upon receipt of the written request, the MC shall provide notice that
12 generally describes the nature of the dispute by posting it on its website. Thereafter, the MC shall
13 cause an item to be placed on the agenda for a regularly-scheduled meeting of the MC within
14 forty-five (45) days or, or if requested by the moving party, call a special meeting for the purpose
15 of providing a full hearing of the dispute and providing the interested Bound Parties with notice
16 and opportunity to be heard. No later than thirty (30) days following the conclusion of the
17 hearing(s), the MC shall issue a written decision that is dispositive of the dispute and that is
18 supported by written findings. The written decision may include additional adaptive management
19 provisions, including but not limited to, any combination of water management and habitat
20 improvement measures sufficient to establish the Fishery as in Good Condition in accordance
21 with this Physical Solution. Any Bound Party may seek review of an adverse decision of the MC
22 in accordance with the provisions of Section 7.7.6. This section does not apply to any dispute
23 wherein any Party seeks a determination of the relative priority rights to water in the Watershed
24 or to establish a comprehensive adjudication of water rights in the Watershed. Any such disputes
25 shall be resolved solely by the Court pursuant to and accordance with Section 9.2 herein.

1 **7.9 Need for Flexibility**

2 This Physical Solution must provide flexibility and adaptability to allow the MC and the
3 Court to use existing and future technological, social, institutional, and economic options in order
4 to maximize reasonable and beneficial water use in the Watershed.

5
6 **8. FINDINGS**

7 The Court finds that the surface water bodies and the **subterranean streams flowing**
8 through known and definite channels of the Ventura River and its tributaries are interconnected
9 with the Ventura River Watershed's four Groundwater Basins: the Lower Ventura River Basin,
10 the Upper Ventura River Basin, the Ojai Valley Basin, and the Upper Ojai Valley Basin.
11 Accordingly, pursuant to Code of Civil Procedure section 833(c) and in accordance with *City of*
12 *Barstow v. Mojave Water Agency* (2000) 23 Cal.4th 1224; *Central Basin Municipal Water*
13 *District v. Fossette* (1965) 235 Cal.App.2d 689; *San Bernardino v. Riverside* (1921) 186 Cal. 7;
14 *Orange County Water District v. Riverside* (1959) 173 Cal.App.2d 137; *Los Angeles v. Glendale*
15 (1942) 23 Cal.2d 68, the Court finds that the adjudication of the surface waters and the
16 groundwater of the Ventura River Watershed should be joint and in this single proceeding and is
17 necessary for a fair and effective determination of a physical solution that should be implemented
18 in the Watershed.

19
20 The Court finds that the Physical Solution: (a) is compelled by the need to maximize the
21 reasonable and beneficial use of all water in the Watershed, avoid the waste of precious water
22 resources, and address continued uncertainty created by unresolved competing claims to water in
23 furtherance of the mandates of the State Constitution and State water policy; (b) is not expected to
24 result in substantial injury to water right holders or beneficial uses; (c) is a fair and equitable basis
25 for satisfying the reasonable and beneficial water uses within the Watershed, including
26 consumptive and instream uses; (d) provides due consideration of and respects common law and
27 statutory water right priorities and applicable public trust resources; and (e) is sufficient for
28 addressing potential undesirable effects of groundwater pumping on the depletion of

1 interconnected surface water, as defined by SGMA, regarding the beneficial use of interconnected
2 surface water by the Fishery so that no additional implementation measures are required under
3 SGMA. The Court finds that the Physical Solution is a legal, practical, and implementable means
4 for making the maximum reasonable and beneficial use of the waters within the Watershed and
5 that the Court is empowered with broad, equitable discretion in imposing this Physical Solution,
6 including reasonable expenses associated therewith.

7
8 The Court finds that, consistent with the California Constitution and public trust doctrine,
9 the protections afforded to the Southern California Steelhead in this Physical Solution will also
10 benefit and protect the other instream uses within the Watershed in an efficient, non-wasteful
11 manner. The Court finds, in accordance with Code of Civil Procedure section 830(a)(4), that this
12 Physical Solution is consistent with the achievement of Groundwater sustainability within the
13 timeframes of SGMA. Specifically, GSPs are designed to attain sustainability by avoiding
14 “undesirable results.” Water Code section 10721 defines “undesirable results” as including
15 “depletions of interconnected surface water that have significant and unreasonable adverse
16 impacts on beneficial uses of surface water” “caused by groundwater conditions occurring
17 throughout the basin.” GSAs in the Watershed may rely on the implementation of the Physical
18 Solution in implementation of their GSPs because the Physical Solution addresses potential
19 undesirable effects of groundwater pumping on the depletion of interconnected surface water, as
20 defined by SGMA, regarding the beneficial use of interconnected surface water by the Fishery.

21
22 The Court has considered existing water management plans and programs, and also finds
23 that the Physical Solution is consistent with the water management and conservation goals
24 contained in the following Water Management Plans:

- 25
26 • The March 2015 Ventura River Watershed Management Plan adopted by the
27 Ventura River Watershed Council, available at [http://venturawatershed.org/the-](http://venturawatershed.org/the-watershed-plan)
28 [watershed-plan](http://venturawatershed.org/the-watershed-plan)

- Groundwater Management Plan – 2018 Update, Ojai Valley Groundwater Basin adopted by the Ojai Basin Groundwater Management Agency, available at <http://obgma.com/wp-content/uploads/2018/09/OBGMA-GMP-2018-Update-Final-8-30-18s.pdf>.

Pursuant to Water Code section 10737.8, the Court finds that this Physical Solution will not substantially impair the ability of a GSA, the State Board, or DWR to comply with SGMA to achieve sustainable Groundwater management. Pursuant to Water Code section 10737.2, the Court finds that this Action has been managed in a manner that minimizes interference with the timely completion and implementation of GSPs for the Basins, avoids redundancy and unnecessary costs in the development of technical information and a physical solution, and is consistent with the attainment of sustainable Groundwater management within the timeframes established by SGMA.

Pursuant to Code of Civil Procedure section 850(a)(1)-(3), the Court finds that this Physical Solution: (1) is consistent with Article X, section 2 of the California Constitution; (2) is consistent with the water right priorities of all non-stipulating Parties and any Persons who have claims that are exempted by this Physical Solution; and (3) treats all objecting Parties and any Persons who have claim that are exempted equitably as compared to the stipulating Parties. This Physical Solution provides flexibility and adaptability to accommodate existing and future technological, social, institutional, and economic options under the Court’s continuing jurisdiction to maximize reasonable and beneficial water use without significant and unreasonable harm to public trust resources. Although this Physical Solution is not a determination of the Bound Parties’ relative water rights, the Physical Solution establishes a requirement that all water use must be undertaken consistent with the Physical Solution and the management measures that will ensure the availability of water for consumptive uses, regardless of water right, while simultaneously maintaining the Fishery in Good Condition and for the protection of public trust resources as provided herein consistent with *National Audubon Society v. Superior Court* (1983)

1 33 Cal.3d 419. However, while the quantification of individual rights and declaration of relative
2 priorities among Bound Parties is not needed at the present time, it is expressly reserved, without
3 prejudice for future determination as may be required by the Court at a later date, as necessary to
4 maintain and implement the Physical Solution or as may be requested by a Party upon a showing
5 that the Physical Solution is injurious to a Party's water right, the priority of that right, or for
6 other good cause. The Court reserves its discretion within its continuing jurisdiction to issue
7 further orders in furtherance of the Physical Solution including the quantification of use and
8 declaration of relative rights among some or all of the Bound Parties.

9
10 Through this Physical Solution, the Bound Parties are obligated to implement the
11 Management Plan that is designed to maintain the Southern California Steelhead population
12 inhabiting the Ventura River Watershed in Good Condition, consistent with Article X, section 2
13 of the California Constitution and the public trust doctrine. The Bound Parties will implement
14 this obligation through the Physical Solution to manage the steelhead population described herein.
15 The Physical Solution is based on the existing scientific literature addressing steelhead in the
16 Watershed, including information contained in the Department Report, and the following reach-
17 by-reach assessment of the Watershed.

18
19 **9. ENFORCEMENT**

20 **9.1 Compliance with Physical Solution**

21 Each and every Bound Party, its officers, directors, agents, employees, successors, and
22 assigns is enjoined and restrained from (1) Producing water from the Watershed except in
23 accordance with the requirements of this Physical Solution, and (2) otherwise violating the terms
24 of this Physical Solution. The Bound Parties must comply with the terms of Physical Solution,
25 may not act or use their powers in any way that conflicts or interferes with the provisions of the
26 Physical Solution, and are subject to the Court's continuing jurisdiction as set forth in section 9.2
27 in accordance with *California American Water v. City of Seaside* (2010) 183 Cal.App.4th 471.

1 **9.2 Continuing Jurisdiction**

2 The Court retains and reserves full jurisdiction, power, and authority for the purpose of
3 enabling the Court, upon motion of a Bound Party, to make such further or supplemental order or
4 direction as may be necessary or appropriate to interpret, enforce, administer, or carry out this
5 Physical Solution, and to provide for such other matters as are not contemplated by this Physical
6 Solution, which might occur in the future, and which if not provided for would defeat the purpose
7 of this Physical Solution. The quantification of individual rights and declaration of relative
8 priorities among the Bound Parties is expressly reserved, without prejudice, for future
9 determination as may be required by the Court at a later date, as necessary to maintain and
10 implement the Physical Solution. Upon a showing to the Court demonstrating that good cause
11 exists, e.g., that the Parties' efforts to bring the Fishery into Good Condition through the Physical
12 Solution have been unsuccessful, the Court reserves continuing jurisdiction to require the
13 quantification of use and declaration of rights among some or all Bound Parties under the City's
14 first, second, third, fourth, fifth, seventh, eighth, and/or ninth claims for relief. The Court further
15 reserves its authority to establish all processes and procedures necessary for the determination of
16 the relative priority rights to water in the Watershed or for an adjudication of water rights in the
17 Watershed among some or all Bound Parties, and the Court further retains jurisdiction to amend
18 the Physical Solution as is necessary.

19 20 **10. MISCELLANEOUS PROVISIONS**

21 **10.1 Actions Not Subject to CEQA**

22 Nothing in this Physical Solution, or in the procedural implementation thereof, or the
23 decisions of any entity acting under the authority of this Physical Solution, including the MC,
24 shall be deemed a "project" subject to CEQA. (See e.g., *California American Water v. City of*
25 *Seaside* (2010) 183 Cal.App.4th 471, and *Hillside Memorial Park & Mortuary v. Golden State*
26 *Water Co.* (2011) 205 Cal.App.4th 534). No Board, committee, or entity formed pursuant to this
27 Physical Solution shall be deemed a "public agency" subject to CEQA. (See Public Resources
28

1 Code § 21063.) Individual projects called for in this Physical Solution and implemented by one
2 or more Parties must be reviewed for required compliance with CEQA, however.

3
4 **10.2 Designation for Notice and Service**

5 Each Bound Party shall designate a name, address, and email address to be used for
6 purposes of all subsequent notices and service herein, either by its endorsement on this Physical
7 Solution or by a separate designation to be filed within thirty (30) days after entry of this Physical
8 Solution. A Bound Party may change its designation by filing a written notice of such change
9 with the MC. If no designation is made, a Bound Party's designee shall be deemed to be, in order
10 of priority: i) the Bound Party's attorney of record; ii) if the Bound Party does not have an
11 attorney of record, the Bound Party itself at the address specified on the MC's list.

12
13 **10.3 Transfer of Real Property**

14 Any Bound Party transferring any real property subject to this Physical Solution shall
15 notify the transferee of the existence of the Physical Solution and its binding effect on the real
16 property; provide grantee with a copy of the Physical Solution; and notify the MC of the transfer
17 and file a written notice of transfer within ten (10) days after the transfer of the real property,
18 stating the name, address, email address, and other contact information of the transferee.
19 Transferee shall become a Bound Party, and if necessary, City shall substitute the transferee as
20 Cross-Defendant pursuant to Code of Civil Procedure section 368.5.

21
22 **10.4 Service of Documents**

23 Unless otherwise ordered by the Court, delivery to or service to any Bound Party by the
24 Court or any Bound Party of any document required to be served upon or delivered to any Bound
25 Party pursuant to this Physical Solution shall be deemed made if by electronic service. All
26 notices or service of documents pursuant to this Physical Solution by MC or any Bound Party will
27 be made by electronic mail to the greatest extent feasible.
28

1 **10.5 No Abandonment of Rights**

2 In the interest of the Watershed, and consistent with the principles of reasonable and
3 beneficial use, and the public trust, no Bound Party shall use more water than is reasonably
4 required. Failure to use all of the water from the Watershed to which a Bound Party is entitled
5 shall not, in and of itself, be deemed or constitute an abandonment of such Bound Party's right, in
6 whole or in part.

7
8 **10.6 Intervention after Entry of Physical Solution**

9 Any Person who is not a Bound Party or successor to a Bound Party and who proposes to
10 Produce water from the Watershed, other than the federal government, is required to seek to
11 become a Party subject to this Physical Solution through a noticed motion to intervene in this
12 Physical Solution prior to commencing any Production. Thereafter, if approved by the Court,
13 such intervenor shall be a Bound Party in this Physical Solution.

14
15 **10.7 Physical Solution Binding on Successors**

16 Subject to the specific provisions contained in this Physical Solution, this Physical
17 Solution applies to and is binding upon, and inures to the benefit of the Bound Parties to this
18 Action and all their respective heirs, successors-in-interest, and assigns.

19
20 **10.8 Costs and Fees**

21 Except subject to any existing court orders, each Bound Party shall bear its own costs and
22 attorney's fees arising from the Action.

23
24 **10.9 Heading and Section References**

25 Captions and headings appearing in this Physical Solution are inserted solely as reference
26 aids for ease and convenience; they shall not be deemed to define or limit the scope or substance
27 of the provisions they introduce, nor shall they be used in construing the intent or effect of such
28 provisions.

1 **10.10 No Third Party Beneficiaries**

2 There are no intended third party beneficiaries of any right or obligation of the Bound
3 Parties.

4
5 **10.11 Severability**

6 Except as specifically provided herein, the provisions of this Physical Solution are not
7 severable.

8
9 **10.12 Cooperation and Further Acts**

10 The Bound Parties shall fully cooperate with one another and shall take any additional
11 acts or sign any additional documents as may be necessary, appropriate or convenient to attain the
12 purposes of this Physical Solution.

13
14 **10.13 Exhibits and Other Writings**

15 Any and all exhibits, documents, instruments, certificates or other writing attached hereto
16 or required or provided for by this Physical Solution, shall be part of this Physical Solution and
17 shall be considered set forth in full at each reference thereto in this Physical Solution.

18
19 **10.14 No Limitation on Statutory Authority.**

20 Except as provided in this Physical Solution, including, but not limited to, Section 9, the
21 Physical Solution does not affect or limit the authority of any Bound Party to fulfill its statutory,
22 regulatory, or contractual responsibilities under applicable law, including, but not limited to, the
23 exercise of statutory authority by the State Board, the Department, the Ventura County Watershed
24 Protection District in implementing Ordinance No. WP-2, and any public agency implementing
25 SGMA, provided that no Bound Party may violate the Physical Solution's terms as implemented
26 and as may be modified by the Court.
27
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Dated: _____

By: _____
The Honorable William F. Highberger
Judge of the Superior Court
County of Los Angeles

Exhibit A – Defined Terms

1. **Action**. The Comprehensive Adjudication of the Ventura River Watershed, Los Angeles Superior Court Case No. 19STCP01176.
2. **Action Plan**. California’s Water Action Plan.
3. **Adoption Phase**. The period commencing after the Court enters Physical Solution and concluding when the Plan is adopted, which shall be no later than eighteen (18) months after entry of the Physical Solution unless otherwise extended by the Court upon motion of any Party for good cause shown.
4. **Adoption Phase Requirements**. The actions required to be taken by the Parties during the Adoption Phase as described further in Section 7.4.1 of this Physical Solution.
5. **AFY**. Acre feet per year.
6. **Amended Cross-Complaint**. The City’s Third Amended Cross-Complaint as thereafter amended in this Action.
7. **Annual Assessment**. Annual assessment adopted by the MC collected as long as funds are required for the implementation of the Plan and Physical Solution.
8. **Annual Report**. The Annual Report prepared by the Technical Advisor to be filed with the Court, as more particularly described in Section 7.7.4.9 of this Physical Solution.
9. **Arundo**. *Arundo donax*.
10. **Baseline Conditions**. The current condition of each reach of the River at the time the Court enters this Physical Solution or as amended hereafter, as more particularly described in Section 7.2 of this Physical Solution.
11. **Basins**. The Lower Ventura River Groundwater Basin, the Upper Ventura River Groundwater Basin, the Ojai Valley Groundwater Basin, and the Upper Ojai Valley Groundwater Basin, as more particularly described in Section 4.3 of this Physical Solution.

- 1 12. **Bound Parties.** The Parties and property bound by this Physical Solution and
2 their successors. This includes persons served a summons or a notice, owners of
3 real property overlying the Basins, the State Board, the Department,
4 Channelkeeper, and any other Person joining this adjudication.
- 5 13. **Casitas.** Cross-Defendant Casitas Municipal Water District.
- 6 14. **Casitas Biological Opinion.** An opinion issued by the National Marine Fisheries
7 Service for operation of the Robles Diversion and Fish Passage Facility.
- 8 15. **Casitas License.** The license issued by the State Board for operation of the
9 Robles Diversion and Fish Passage Facility.
- 10 16. **CEQA.** The California Environmental Quality Act, Public Resources Code,
11 section 21000, *et seq.*
- 12 17. **Cfs.** Cubic feet per second.
- 13 18. **Change.** Adopting the Plan, amending the Plan, making material modifications to
14 the implementation of the Plan.
- 15 19. **Channelkeeper.** Plaintiff Santa Barbara Channelkeeper.
- 16 20. **City.** Defendant and Cross-Complainant City of San Buenaventura.
- 17 21. **City Settlement.** The settlement agreement executed by Channelkeeper and the
18 City on September 30, 2019, as amended on August 20, 2020.
- 19 22. **Complaint.** The Complaint and Petition for Declaratory Relief and a Writ of
20 Mandate filed by Channelkeeper in the County of San Francisco Superior Court
21 (Case No. CPF-14-513875), and as thereafter amended in this Action.
- 22 23. **Comprehensive Adjudication Statutes.** Code of Civil Procedure sections 830
23 through 852.
- 24 24. **Conditional Waiver.** The Conditional Waiver of Waste Discharge Requirements
25 for Discharges from Irrigated Lands in the Los Angeles Region.
- 26 25. **Cross-Defendants.** Those Parties named as defendants in the Amended Cross-
27 Complaint and those Persons who filed an answer to the Amended Cross-
28 Complaint.

- 1 26. **De Minimis** Producer or Production. Any existing or New Production that is
2 limited to less than five (5) AFY.
- 3 27. **Department**. The California Department of Fish and Wildlife.
- 4 28. **Department Recommendations**. Draft Instream Flow Recommendations for the
5 Lower Ventura River and Coyote Creek issued by the Department.
- 6 29. **Department Report**. The Department’s Instream Flow Regime Criteria on a
7 Watershed Scale for the Ventura River dated March 2020, Version 2 updated May
8 2020 (Watershed Criteria Report No. 2020-01).
- 9 30. **DWR**. The California Department of Water Resources.
- 10 31. **Endangered Species Act**. The Endangered Species Act, 16 U.S.C. section 1531,
11 et seq.
- 12 32. **ESU**. The Southern California Steelhead Evolutionarily Significant Unit listed as
13 endangered under the federal Endangered Species Act in 1997. Since 2006,
14 Southern California Steelhead Distinct Population Segment has replaced the
15 Southern California Steelhead.
- 16 33. **Fishery**. The anadromous life history form of the Southern California Steelhead
17 Trout within the Ventura River Watershed that has been listed as endangered
18 under the Endangered Species Act. However, for purposes of the Physical
19 Solution’s monitoring and assessment, the Fishery includes *O. mykiss* that inhabit
20 waters of the Ventura River and its tributaries downstream of the first impassable
21 barrier or impediment to upstream migration that have volitional access to coastal
22 marine waters.
- 23 34. **Good Condition**. The condition of the Fishery in the Watershed when the
24 qualitative individual, population, and community conditions described in the
25 Physical Solution and in the Plan are being achieved.
- 26 35. **Groundwater**. Water beneath the surface of the earth within the zone below the
27 water table in which the soil is completely saturated with water, but not including
28 water that flows in known and definite channels.

- 1 36. **GSA**. Groundwater Sustainability Agency as that term is defined in Water Code
2 section 10721(j).
- 3 37. **GSP**. Groundwater Sustainability Plan as that term is defined in Water Code
4 section 10721(k).
- 5 38. **Historical Flow Conditions**. Flows in the Watershed in the pre-development
6 period generally before 1958 as determined from gages at Foster Park (gage
7 11118500), San Antonio Creek (gage 11117500), and North Fork Matilija Creek
8 (gage 11116000).
- 9 39. **Initial Implementation Phase**. The period commencing after adoption of the
10 Plan and concluding ten years thereafter.
- 11 40. **Initial Implementation Phase Requirements**. The actions required to be taken
12 by the Parties during the Initial Implementation Phase as described further in
13 Section 7.4.2 of this Physical Solution.
- 14 41. **Judgment**. The Judgment entered by the Court in this Action that imposes the
15 Physical Solution.
- 16 42. **Long Term Report**. The report prepared by the Technical Advisor to be filed
17 with the Court, as more particularly described in Section 7.7.4.9 of this Physical
18 Solution.
- 19 43. **Lower Ventura River Basin**. The Groundwater Basin designated as Number 4-
20 302 by DWR Bulletin 118 and as more particularly described in Section 4.3.1 of
21 this Physical Solution.
- 22 44. **Management Plan or Plan**. The Management Plan described in Section 7.3 of
23 this Physical Solution.
- 24 45. **MC**. The Management Committee, which is a five member board composed of
25 one representative each from the (1) City, (2) Casitas, (3) VRWD, (4) MOWD,
26 and (5) the Agricultural/Agricultural Mutual Water Company Group. There shall
27 be four non-voting ex officio members of the MC composed of (1) one
28 representative from the County of Ventura, (2) one environmental stakeholder

1 representative, (3) one representative of the Upper Ventura River Groundwater
2 Agency, and (4) one representative of the Ojai Basin Groundwater Management
3 Agency. Each representative shall be an employee, board member, group member,
4 or other qualified designated representative of the designated entity and shall have
5 knowledge of the Watershed, the Fishery, and existing water management
6 activities in the Watershed. The MC, subject to Court oversight, shall be primarily
7 responsible for causing the Parties to implement this Physical Solution.

8 46. **MOWD**. The Meiners Oaks Water District.

9 47. **New Production**. Any Production from the Watershed by a Person who did not
10 Produce water from the Watershed prior to January 2, 2020.

11 48. **Non-Producer(s)**. A Person who owns real property within the Watershed who is
12 not presently Producing water and did not do so any time during the five years
13 preceding January 2, 2020 and who may claim the right to Produce water from the
14 Watershed.

15 49. **Ojai GMA**. The Ojai Basin Groundwater Management Agency.

16 50. **Ojai Valley Basin**. The Groundwater Basin designated as Number 4-2 in DWR's
17 Bulletin 119 and as more particularly described in Section 4.3.3 of this Physical
18 Solution.

19 51. **Party (Parties)**. The parties to this Action and their successors. This may be a
20 subset of Bound Parties depending on context and intent in the Judgment or
21 Physical Solution.

22 52. **PCEs**. Primary constituent elements.

23 53. **Person**. Any natural person, firm, association, organization, joint venture,
24 partnership, business, trust, corporation, or public entity.

25 54. **Physical Solution**. Stipulated Physical Solution and Judgment contained herein.

26 55. **Plan or Management Plan**. The Management Plan described in Section 7.3 of
27 this Physical Solution.

28 56. **Produce (Production)**. To pump, extract, or divert water.

- 1 57. **Production Report**. A Production Report is an annual report required to be
2 submitted by the certain Parties consistent with Water Code section 4999 et seq.,
3 and providing the information on historical water use required by Water Code
4 section 5002, as set forth in Section 7.7.4.4.
- 5 58. **Producer(s)**. A Person who Produces water.
- 6 59. **Producer's Percentage**. A Producer's percentage share of the total Watershed
7 water production in five-year increments based upon the use in the five years
8 immediately preceding the commencement of the Implementation Phase and will
9 continue to be the basis for levying assessments during the first five-year period
10 and shall be recalculated every five years and will be an amount equal to the
11 Producer's average annual percentage share of the total Watershed water
12 production as measured over the immediately preceding five-year period.
- 13 60. **SGMA**. The Sustainable Groundwater Management Act, Water Code section
14 10720, *et seq.*
- 15 61. **Southern California Steelhead or Steelhead**. The particular anadromous life
16 history form of *O. mykiss* in the Ventura River Watershed.
- 17 62. **State Board**. The California State Water Resources Control Board.
- 18 63. **Status Reports**. The Annual Report and Long Term Reports prepared by the
19 Technical Advisor, approved by the MC, and filed with the Court, as more
20 particularly described in Section 7.7.4.9 of this Physical Solution.
- 21 64. **Subsequent Implementation Phase**. The period commencing after the expiration
22 of the Initial Implementation Phase.
- 23 65. **Technical Advisor**. The advisor selected by the MC with the necessary training,
24 experience, and education to provide technical oversight of the implementation
25 and performance of the Management Plan outlined in this Physical Solution and to
26 make recommendations to the MC.
- 27 66. **Uncontrollable Conditions**. Any circumstance beyond the Parties' control,
28 including without limitation, any act of God, war, fire, earthquake, flood,

1 windstorm, drought or natural catastrophe, including climate change; the need to
2 provide reasonable and beneficial consumptive use of water from the Watershed;
3 criminal acts; civil disturbance, vandalism, sabotage, or terrorism; restraint by
4 court order or public authority or agency; or action or non-action by, or inability to
5 obtain the necessary authorizations or approvals from any governmental agency.

6 67. **Upper Ojai Valley Basin**. The Groundwater Basin designated as Basin Number
7 4-1 in DWR's Bulletin 118 and as more particularly described in Section 4.3.4 of
8 this Physical Solution.

9 68. **Upper Ventura River Basin**. The Groundwater Basin designated as Basin
10 Number 4-3.01 in DWR's Bulletin 118 and as more particularly described in
11 Section 4.3.2 of this Physical Solution.

12 69. **VCAILG**. The Ventura County Agricultural Irrigation Lands Group.

13 70. **VRWD**. The Ventura River Water District.

14 71. **Watershed or Ventura River Watershed**. The entire Ventura River and its
15 tributaries, as well as the Basins.

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Exhibit B – List of Cross-Defendants

Exhibit B

Cross-Defendants

1970 Ranch Road, LLC;
Aaron and Angela Hoekstra, individually;
Abel and Lourdes Carranza, individually;
Abraham Munoz;
Acslyaton, LLC;
Adam Distl, Jr. and Barbara B. Distl,
individually as Trustees of the Adam Distl,
Jr. and Barbara B. Distl 1998 Revocable
Trust;
Adrian Ogden;
Aera Energy, LLC;
AGR Breeding, Inc.
Ahde and Ganea Lahti, individually;
Ajr Investment Partnership, LP;
Alan and Carol James, individually;
Alan and Deborah Sharon, individually;
Alan and Leslie Connell, individually;
Alan and Mary Kirby, individually;
Alan and Susan Ecker, individually;
Alan Walbridge and Dorothy Fay
Walbridge, individually;
Alberto and Adriana Montano, individually;
Alberto and Hilda Zamora, individually;
Albine Hopcus and Alva Lydia Hopcus,
individually as Trustees of the Al and Alva
Trust;
Alessandro Lobba and Mary E. Jackson,
individually as Trustees of the Looba-
Jackson Family Trust;
Alexander and Maria Doran, individually;
Alfonso and Alejandra Limon, individually;
Alfredo and Montelle Bello, individually;
Allan and Janis Parkhurst, individually;
Allan and Katharine Parigian, individually;
Allan and Mary Doane, individually;
Allen Vail;
Alvaro and Elva Ruiz, individually;
Alvin and Claudia Cunningham,
individually;
Alvin and Claudia Cunningham,
individually;
American Retirement Fund, Inc.;
Amy Mattison, Trustee of the Amy K.
Mattison Trust;
Ana Cross, Trustee of the Ana Cross Family
Trust;

Andre Keunzli and Fabrienne Keunzli-
Monard, individually;
Andrea Leigh Jensen, Trustee of the Jensen
Trust;
Andrew and Jane Holguin, individually;
Andrew and Melissa Maccalla, individually;
Andrew and Rebecca Chandler,
individually;
Andrew and Sharon Engel, individually;
Andrew D. West and Patricia G. West,
individually as Trustees of the West Family
Revocable Trust;
Andrew Stasse
Angie Mari Ganasei and Christopher Paul
Danch, individually as Trustees of the
Genasei-Danch Family Trust;
Anita J. Diaz;
Ann H. Donlon, Trustee of the Ann H.
Donlon Revocable Trust;
Anna Kirkwood;
Anne and Daniel Goldstein, individually;
Anne Lombard and Frank Hanson,
individually;
Anson B. Thacher and Anne F. Thacher,
individually as Trustees of the A. and A.
Thacher Living Trust;
Anthony Becchio and Denise Heimo,
individually;
Anthony Masiel;
Antonio Espino and Maria Torres,
individually;
Armando and Sendi Sanchez, individually;
Arne Anselm and Michelle Velderrain,
individually;
Arne Anselm, Trustee of the Velderrain M.
Trust;
Arthur Timothy and Maurya Kathleen Foy,
individually;
Ashley and Victoria Edwards, individually;
Asquith Family Limited Partnership, Ltd.
Aubrey Balkind;
Baldemar Alcantar and Micaela Ortiz
Alcantar, individually;
Barbara A. Fitzgerald, Trustee of the
Fitzgerald 1994 Trust;
Barbara Bonsignori;

Cross-Defendants

Barbara Chen Lowentha, Trustee of the 2017 Barbara Kay Chen Lowenthal Revocable Trust;
Barbara Hall, Trustee of the Barbara Hall Living Trust;
Barnard Properties, LLC;
Barry and Angela Ross, individually;
Bart Kennedy;
Barton Kennedy;
Behrooz Jadidollahi;
Bentley Family Limited Partnership
Berkley and Suzanne Baker, individually;
Bernard Martin;
Beth E. Lindley;
Betina La Plante
Bettina Chandler, Trustee of the Bettina Chandler Trust;
Bettyann Sessing;
Big Black Dog, LLC;
Bill Moses
Blanche Chapler;
Blaze Buonpane;
Bradford and Cheryl Boyd, individually;
Bradley and Andrea Roe, individually;
Brand and Tressa Kahler, individually;
Brandon and Kelsie Schneider, individually and as Trustees of the Brandon Schneider and Kelsie Simms-Schneider Family Trust;
Brear Rowe;
Brent and Pamela Lamo, individually;
Brent and Shanna Muth, individually;
Brett and Lynn Wilson, individually;
Brett Cunningham;
Brett Kantrowitz
Brett Nicholson and Nan Davis, individually;
Brian A. Schaffels;
Brian and Cynthia McDaniel, individually;
Brian and Erin Edwards, individually;
Brian McConville;
Brian and Jean Harrison, individually;
Brian and Joan Archer, individually;
Brian and Marie Haase, individually;
Brian and Sharon Smith, individually;
Brian and Siobhan Calvin, individually;
Brian Osborne and Kirsten Hinrichs, individually;
Brian S. Stafford and Janice M. Thomas, individually as Trustees of the Stafford Thomas Family Trust;
Brian Skaggs, Trustee of the Skaggs Trust;
Brigitte Lovell, Trustee of the Lovell Living Trust;
Brittany and Alan Fletcher, individually;
Bruce Abbott and Kathleen Quinlan, individually;
Bruce and Dixie Gladstone, individually;
Bruce and Leslie Bouche, individually;
Bruce and Virginia Hibberd, individually;
Bruce C. Brockman and Bridget Tsao-Brockman, individually as Trustees of the Tsao Brockman Family Trust;
Bryan and Nicole Crawford, individually;
Bryan Whitley;
Bryce and Krista Belgum, individually;
Bulmaro and Alfonsa Pena, individually;
Burgess Ranch
Byron and Jennifer Greene, individually;
Byron Rader and Myra Toth, individually;
Cal B. Land Co., LLC;
Calatlantic Group Inc.;
Calvin Zara
Camp Ramah in California Inc.;
Carl and Barbara Enson, individually;
Carl and Judith Bell, individually;
Carl and Leigh Hyndman, individually;
Carl Gaddis and Anna Hicks, individually;
Carla Dennis, Trustee of the Carla D. Dennis Trust;
Carla Melson and Carla J. Melson, individually as Trustees of the Carla J. Melson Revocable Living Trust;
Carmen and Carolina Murillo, individually;
Carmen Chavez and Guadalupe Patino, individually;
Carol Ann Tennant, Trustee of the Carol McDonnell Family Trust;
Carol Marquez-Olson, Trustee of the Carol Marquez-Olson Trust;
Carol Nicholson;
Carol Vesecky, Trustee of the Carol B. Vesecky Revocable Living Trust;

Cross-Defendants

Caroline Turner, Trustee of the Turner Survivors Trust;
Carolyn Bowman, Trustee of the Carolyn Bowman 2008 Trust;
Carolyn Huish;
Carrie Murphy and Michael E. Templin, individually as Trustees of the Templin-Murphy 2016 Living Trust;
Cartin Family, LLC;
Caryn Molinelli;
Casitas Municipal Water District
Casitas Mutual Water Company
Catherine E. Lee, Trustee of the Catherine E. Lee Trust;
Catherine Sellman;
Catherine Smith, Trustee of the Catherine L. Smith Revocable Trust;
Cesar and Davienne Guerra, individually;
Cesar Jimenez and Aura Minera, individually;
Chaarenne Torris and Raymond Bradley, individually;
Chad Carper;
Chad Ress and Stephanie Washburn, individually;
Chad Vick, Trustee of the Chad C. Vick Trust;
Chad Westcott and Heather Cushnie Wescott, individually;
Charlene Van Deusen;
Charles and Deana Sherry, individually;
Charles and Jo Bennett, individually;
Charles Cho
Charles E. Starbuck, Trustee of the Charles E. Starbuck Trust;
Charles G. Barnett, Successor Trustee of the "Barnett Family Exemption Equivalent Trust";
Charles L. Hoff and Kathleen D. Hoff, Co-Trustees of the Hoff Revocable Trust;
Charles P. Watling, Trustee of the First Charles P. Watling Family Trust;
Charles R. Rudd and Lola L. Rudd, Trustees under the Charles R. Rudd and Lola L. Rudd Trust;
Charles Rudd

Charline L. Rich and Richard Gibson Jr., individually;
Cheryl Jensen
Christine Golden;
Christopher and Anna Rhoda, individually;
Christopher and Shelagh Duke, individually;
Christopher and Tina Abe, individually;
Christopher Corsones, Trustee of the Christopher Corsones Living Trust;
Christopher Hart;
Christopher McGuire;
Christopher Moore and Mary Moore, individually as Trustees of the Christopher Moore and Mary Moore Trust;
Christopher Sewell;
Cindy Burkhart, Trustee of the Cindy Burkhart Living Trust;
City of Ojai;
Clair and Stacey Harding, individually;
Claudia Farr, Trustee of the Sam S. Farr and Claudia S. Farr Trust;
Claudia Wunderlich, Trustee of the Claudia A Wunderlich Trust;
Claudia Zenobia Linarte, Trustee of the Olga Trust;
Claudio and Magdalena Landeros, individually;
Cody Green;
Cody Stevens;
Community Memorial Health System;
Connie Anaise;
Connie and Mark Cline, Trustee of the Mark Terry Cline Family Trust;
Connie S. Morgan, Trustee of the Connie S. Morgan Trust;
Conservation Endowment Fund;
Constance and Justin Campbell, individually;
Constance Eaton;
Corinne Anne Fraudt;
Cory and Nicholas Wingate, individually;
County of Ventura;
Craig and Ana Zwirn, individually;
Craig and Stephanie Gardner, individually;
Craig Young;
Culbert Family Partnership;

Cross-Defendants

Christina Tolmie;
Curtis and Ory Names, individually;
Cynthia Lee, Trustee of the Cynthia Lee Family Trust;
D & J Campbell Best, LLC;
Daj Properties, LLC;
Damon and Anne Brink, individually;
Dan Newman;
Dan Wiseman;
Dana and Dawn Cenicerros, individually;
Daniel and Adaya Walsh, individually;
Daniel and Amy Yanez, individually;
Daniel and Deborah Hoyt, individually;
Daniel and Elizabeth George, individually;
Daniel and Elizabeth Mclaughlin, individually;
Daniel and Jane Kelly, individually;
Daniel and Lydia Ruark, individually;
Daniel and Nancy McLaren, individually;
Daniel and Ralph Fairbanks, individually;
Daniel and Rosalind Grimm, individually;
Daniel and Tomica Mora, individually;
Daniel and Yoko Mcsweeney, individually;
Daniel Chrynko;
Daniel Crane;
Daniel H. I. and William D. Moses Jr., individually as Trustees of the William D. Moses, Jr. Separate Trust No. 1;
Daniel Hultgen, Trustee of the Hultgen Living Trust;
Danny Broadhurst;
Danny Haar and Mariska De Feiter, individually;
Darrell Ralston, Trustee of the Darrell Anthony Ralston 2009 Revocable Trust;
Darren and Lisa Lisle, individually;
Dave and Kathleen Tarrats, individually;
David and Beverly Fulton, individually;
David and Carol Cintron, individually;
David and Deborah Todd, individually;
David and Donna Berger, individually;
David and Elizabeth Silva, individually;
David and Fereschta Sinclair, individually;
David and Karen Brubaker, individually;
David and Kathleen Ostby, individually;
David and Laura Meisch, individually;

David and Laurie Mahan, individually;
David and Linda Smith, individually;
David and Meghan Sandoval, individually;
David and Patti Wicklund, individually;
David and Peggy Stanwood, individually;
David and Sandra Murillo, individually;
David and Shannon Richard, individually;
David and Sharron Sparks, individually;
David and Stephanie Berger, individually;
David and Toni Johnson, individually;
David Chase and Anne Fitzgerald, individually;
David Corey and Jean Scholes, individually;
David E. Pressey and Agnes E. Pressey, individually as Trustees of the David E. and Agnes E. Pressey Family Trust;
David E. Sissum, Jr. and Diana E. Sissum, individually as Trustees of the Sissum Trust;
David Flick and Emma Flick, individually;
David Friend and Angela Marie Friend, individually;
David Kille and Shannon Frew, individually;
David Orbach and Eva Araujo, individually;
David Stanley and Monica Bednar Stanley, individually;
Dawn and Barclay Hope, individually;
Dawn and Mark Golden, individually;
DB Properties, LLC;
De and Jacque Pisciotta, individually;
Dean and Gloria Vadnais, individually;
Dean and Lorinda Strong, individually;
Deanna Gonzales, individually;
Deirdre Lynds, individually;
Del Cielo, LLC;
Delavan C. Garst and Sharon D. Garst, individually as Trustees of the Delavan and Sharon Garst Family Trust;
Dell and Anne Mercer, individually;
Delores Berlin;
Denise Kantrowitz
Denise Wizman, as Trustee of the Denise Wizman Revocable Trust;
Dennis and Cheryl Jacobs, individually;
Dennis and Nadine Corte, individually;
Dennis and Susan Ryder, individually;

Cross-Defendants

Dennis Brown;
Dennis Wood and Margaret Vigil Wood,
individually;
Derek Meek;
Devon and Jillianne Collinge, individually;
Dewayne Boccali
Diana Engle, Trustee of the Diana L Engle
Revocable Trust;
Diana Peron, Trustee of the Diana C Peron
Living Trust;
Diana Syvertson, Trustee of the Diana
Syvertson Living Trust;
Diana Trent, Trustee of the Diana Trent
Living Trust;
Diane and William Clegg, individually;
Diane Ruth White, Trustee of the Diane
Ruth White Living Trust;
Dive Deep, LLC;
Dolores Keith;
Dominic Habibi;
Donald and Clara Tenpenny, individually;
Donald and Wendy Givens, individually;
Donald Brosnac and Twila Carlsen,
individually;
Donald Campbell;
Donis Montoya Jr. and Teresita Montoya,
individually;
Donna Deitch, Trustee of the Donna E.
Deitch Trust;
Donna Epstein, Trustee of the Epstein
Survivors' Trust, Trustee of the Epstein
Marital Trust, and Trustee of the Epstein
Bypass Trust;
Dorothy Lanquist;
Dorthea Keck;
Douglas and Ann Parent, individually;
Douglas and Claudia Webber, individually;
Douglas and Elisabeth Vernand,
individually;
Douglas and Kathleen Leighton,
individually;
Douglas and Moira Volpi, individually;
Douglas Draper;
Douglas Freeman and Miranda
MargettGunild Seadrifts, individually;
Douglas Wasson, Trustee of the Wasson
Trust;
Duncan Abbott
Dustin Beilke;
Dwayne Bower
DZ SPE, LLC;
Ed and Linda Colby, individually;
Edson Taft, Trustee of the Edson B. Taft
Revocable Trust;
Edward and Deborah Guerra, individually;
Edward and Geraldine Lee, individually;
Edward and Laura Savala, individually;
Edward and Nancy Dennis, individually;
Edward and Nancy Necker, individually;
Edward and Roberta Walsh, individually;
Edward C. Leicht and Jacqueline M. Leicht,
individually as Trustees of the Leicht Family
2013 Revocable Trust;
Edward Dunn and Judith Shelby Dunn,
individually;
Edward Pressey;
Edwin Norris Procter, Trustee of the "E.
Norris Procter Living Trust";
Eilam Byle, Trustee of the Eilam Byle
Living Trust;
Eileen Sterling, Trustee of the Eileen M.
Sterling Revocable Trust;
El Sereno 1225, LLC;
Elaiene Keeley, Trustee of the Elaiene
Keeley Trust;
Elaine Ferguson;
Elena Dhyansky, Trustee of the Elena
Dhyansky Trust;
Eli and Jessica Neiderhiser;
Elia Aldapa;
Elizabeth Bauer, Trustee of the Elizabeth A
Bauer Trust;
Elizabeth Keenen;
Ellen Leopold;
Elmer and Joan Swift;
Elton Pedersen and Alma Clayton Pedersen,
individually;
Emily Benson and Lisa Martel, individually;
Emily Clay and Matthew Goodman,
individually;
Erbay and Velda Garcia, individually;
Eric and Arlene Schwerdtfeger,

Cross-Defendants

individually;
Eric and Jodi Perdue, individually;
Eric and Jolene Harrington, individually;
Eric and Ming Jun Nakamura, individually;
Eric and Trisha Johnson, individually;
Craig Young;
Eric Dilks, Trustee of the Eric M. Dilks
2004 Revocable Trust;
Eric Goode;
Eric Lawrence Bernthal, Special Trustee of
the Boss and Venice Trust;
Eric Lewis and Bobbi Roderick Lewis,
individually;
Eric Moore;
Eric Rosenberg;
Erik and Tirica Eads, individually;
Dorothy Nichols;
Ernest Ford
Ernesto Vega
Esperanza and Sandra Guerrero,
individually;
Essick Farm Management Company, LLC
Etchart Ranch;
Eugene and Charlotte Elerding, individually;
Eugenijus Valiulis, Trustee of the Eugenijus
Valiulis Revocable Living Trust;
Eusebio and Lori Navarro, individually;
Evangeline Bonsall Smith, a married
woman;
Evelyn Baran, Trustee of the Evelyn F
Baran Personal Residence Trust;
Evelyn Frament;
Ezequiel and Amber Monarrez, individually;
Felix and Delmy Garcia, individually;
Fernando Porras;
Feroz and Mona Zaidi, individually;
Finch Farms, LLC;
Floyd and Charlene Fitzgerald, individually;
Wiancko and Hiroko Wiancko, Trustee of
the Wiancko Family Trust;
Flying H Ranch, Inc.
Forest Home, Inc.;
Fortune Builders, Inc.;
Fortune Real Estate 888, LLC;
Francis and Shauna Longstaff, individually;
Francisco and Angelica Valles, individually;

Frank and Lila Sheltnren, individually;
Frank C. Urias and Evangeline S. Urias,
individually as Trustees of the Urias Family
Trust;
Frank Charolla;
Frank Edward Sheltnren, Jr., aka Frank E.
Sheltnren and Rita Cheryl Sheltnren,
individually as Trustees of the Sheltnren
Family Trust;
Frank Robert Walker Jr. and Carrie Ellen
Walker, individually as Co-Trustees of the
Walker Jr. Living Trust;
Fred and Carine Fisher, individually;
Fred and Donna Stevens, individually;
Fred Kramer and Michaela Watkins,
individually;
Frederic Devault;
Frederick and Laura Fulmer, individually;
Frederick and Lori Ponce, individually;
Fredrick and Roxanne Baker, individually;
Fredrick Menninger
Friend's Ranches, Inc.
Future Mhps, LLC;
Gabriel and Margarita Mendoza,
individually;
Gale and Bernabe Gaona Jr., individually;
Galen and Maria David, individually;
Chari Petrowski;
Gary and Colleen Fry, individually;
Gary and Jolene Clarke, individually;
Gary and Judith Stever, individually;
Gary and Patricia Tucker, individually;
Gary and Teresa Downard, individually;
Gary and Terri McCaskill, individually as
Trustees of the McCaskill Family Trust;
Gary Hirschcron, Trustee of the Gary
Hirschcron Revocable Trust;
Gary L. Wolfe, Successor Trustee of the
Carolyn M. Tastad Revocable Trust;
Gary Speeds and Lisa R. Kirby, individually
as Trustees of the Gary Speeds and Lisa
Kirby Family Trust;
Gelb Enterprises;
Gene and Patty Saito, individually;
Geneva Maschler and Richard Yaciuk,
individually;

Cross-Defendants

Geoffrey and Paula Clarke, individually;
Geoffrey Brown and Stephanie Gibson,
individually;
George and Linda Boston, individually;
George and Lynn Malone, individually;
George and Margaret Melton, individually;
George and Pamela Zeller, individually;
George and Roxanne Pelt, individually;
George and Sigrid Bressler, individually;
George Hernandez;
George Lawhead, Trustee of the George and
Carole Lawhead Revocable Trust;
George S. Stuart
George Stuart;
Gerald and Darlene Carlson, individually;
Gerard Linsmeier;
Gerben and Jill Hoeksma, individually;
Gino Lynch;
Girl Scouts Of California's Central Coast;
Glenn and Lori Ahlberg, individually;
Glenn Myers, Trustee of the Glenn C. Myers
Family Trust;
Gordon and Patricia Black, individually;
Gordon and Terry Hanusek, individually;
Gordon Gibbons, Trustee of the Gordon R.
Gibbons Living Trust;
Gralar, LLC;
Grant Kemp;
Graydon and Helen Harrah, Individually;
Greg and Julie Tebo, individually;
Gregg and Rosie Dierickx, individually;
Gregg Olson, Trustee of the Gregg W.
Olson Revocable Trust;
Gregory and Kaori Golden, individually;
Gregory and Martha Lepine, individually;
Gregory and Michele Hammed,
individually;
Gregory and Sarah Delvecchio, individually;
Gregory and Susan Gilbert, individually;
Gregory and Susan Ignacio, individually;
Gregory and Suzanne Combs;
Gregory Cavette;
Gregory Grant and Mary King, individually;
Gregory Heras and Rozanne Bonavito,
individually;
Gregory Johnson;

Gregory N. Pimstone and Lauryn B. Harris,
individually as Trustees of the Pimstone
Family Trust;
Gridley Road Water Group
Griffin and Nicole Williamson, individually;
Gudaz, LLC;
Guy and Sheri Flasch, individually;
Guy Bratton;
H and Beverly Leard, individually;
H. H. Leard and Beverly Leard, individually
as Trustees to the Leard Family Trust
Hacienda Ladera, LLC;
Hank and Alana Garcia, individually;
Hans and Annika Gruenn, individually;
Hans and Eileen Van Koppen, individually;
Harald Wagner;
Harlan Kossow;
Harrison Hill and Lauren Wilson,
individually;
Harry and Marilyn Lehr, individually;
Harry Joe;
Hayden and Raquel White, individually;
Hector and Rocio Torres, individually;
Heidi C. Kurtz, Trustee of the Gunild Walsh
Seadrift Qprt FBO Heidi C. Kurtz;
Heliberta Valencia;
Help of Ojai, Inc.;
Hendrika Maria Von Hecht;
Geneva Oliva;
Henry and Leslie Sohm, individually;
Henry and Moira Tarmy, individually;
Hermann and Gay Thomsen, individually;
Hermitage Mutual Water Company
Hickey Bros Land Co. Inc.;
Holly Bassuk;
Howard Altman, Trustee of the Gerta Maritz
Trust;
Ruth Miller;
Hoyt Tarola;
Hugh and Lindsay Thomson, individually;
Ian Atkinson;
Ignacio and Rose Vega, individually;
Imelda Mares, Trustee of the Imelda Mares
Trust;
Industrial Ventura;
Integritas Ojai, LLC;

Cross-Defendants

Irma Cruz;
Irma Tracy;
Isidro Sanchez;
J Investments;
Jack and Marie Kenton, individually;
Jack and Simone Patterson, individually;
Jack and Verna Turbyville, individually;
Jackie M. Springer, Trustee to the Jackie M. and Lanie Jo Springer Trust;
Jacob and Anja Zimmerman, individually;
Jacqueline Dorfman, Trustee of the Jacqueline Dorfman Revocable Living Trust;
Jacqueline Urband;
Jakob and Marianne Vos, individually;
James and Alisa Varney, individually;
James and Andrea Pendleton, individually;
James and Daniela Casey, individually;
James and Dori Sandefer, individually;
James and Gayle David, individually;
James and Janet Lecroy, individually;
James and Maryetta Sanders, individually;
James and Randi Catlett, individually;
James and Staci Valencia, individually;
James Mills;
James and Wendy Osher, individually;
James and Zelda Carr, individually;
James Data;
James Finch
James Finch, Trustee of the Finch Family Trust;
James Finley, Trustee of the James and M. Reen Finley Family Trust;
James I. Pio, Trustee of the James I. Pio Trust;
James J. Finch and Lorraine Holve Finch, individually as Trustees of the James J. Finch and Loraine Holve Finch Living Trust;
James Kirk and Jacelyn Hayes, individually;
James Paul Finch;
James Peck;
James Selman, Trustee of the James C. Selman Revocable Inter Vivos Trust;
James W. Coultas and Margaret Coultas, Trustees of the James A. and Margaret H. Coultas Intervivos Trust;
James W. Coultas, Trustee of the Coultas Living Trust;
Jan and Priscilla Granade, individually;
Jan M. Hiester, Trustee of the Jan M. Hiester 2014 Living Trust;
Jane E. Hanchett, Trustee of the Hanchett Family Trust;
Jane Mccord, Trustee of the Jane Ann Mccord Living Trust;
Jane Spiller, Trustee of the Jane Spiller Trust;
Janet Boulton
Janet Lewis, Trustee of the Janet T. Lewis Family Trust;
Janet Mcginnis, Trustee of the Janet Karen Mcginnis Trust;
Janet Peck, Trustee of the Janet Lee Peck Living Trust;
Janice and Jesse Hillestad, individually;
Janice Hall, Trustee of the Hall Trust;
Janis Long Nicholas and Jess E. Long, individually as Co-Trustees of the Long Family Trust;
Jason and Jene Loomis, individually;
Jason and Lana Spear, individually;
Jason Loomis;
Jasper and Jessica Jones, individually;
Jayne Pendergast, Trustee of the 2014 Jayne E Pendergast Trust;
Jeannette Curtis;
Jeff and Cheree Simons, individually;
Jeff and Desiree Wilby, individually;
Jeff Mabry;
Jefferie Skaggs and Timothy Bunce, individually;
Jeffrey and Denise Helm, individually;
Jeffrey and Donna Meyer, individually;
Jeffrey and Holly Lieber, individually;
Jeffrey E. Frank, Trustee of The Frank Trust;
Jeffrey Jenson;
Jeffrey Kenton, Trustee of the Jeffrey T. Kenton 2004 Revocable Living Trust;
Jeffrey Luttrull
Jeffrey S. Bacon, Trustee of the Villa Nero

Cross-Defendants

Trust;
Jeffrey Tubbs and Lynn Dubowy Duran,
individually;
Jeffrey Weinstein;
Jennie Scott, Trustee of the Jennie Scott
Family Trust;
Jennifer Kistler, Trustee of the Jennifer L
Kistler Trust;
Jennifer Ware and Jamie Selby,
individually;
Jeremy and Brittanica Rennie, individually;
Jeremy August and Icole Marie Ferro,
Individually;
Jeri Leonard;
Jerome H. Hittleman and Lynne M.
Goldfarb, Trustees of the Jerome H.
Hittleman and Lynne M. Goldfarb
Revocable 2016 Trust;
Jerry Dean Miner and Geraldine Ann Miner,
Trustees of the Miner Trust;
Jerry Kenton
Jess Earl Long;
Jesse Wadsworth and Susan Hynds,
individually;
Jessie Stricchiola and Rosemary Garrison,
individually as Trustees of the Phoenix
Revocable Trust;
Maria Ramos;
Jesus Cornejo and Idania Yudith Cornejo,
individually;
Jill Olivares, Trustee of the Jill Ann Olivares
Revocable Living Trust;
Jimmy and Theresa Ramirez, individually;
JLB Rancho Vista, LLC;
Joan Geddes and John Saluppo,
individually;
Joan Kenton, Trustee of The Joan Kenton
Living Trust;
Joan Robles;
Joann Benson, Trustee of the Joann Alva
Benson Revocable Living Trust;
Joanna Pope;
Jody Callegari;
Joe Clark
Joel Fox and Jennifer Day, individually;
Joel Hernandez;

Joel Vuylsteke, Trustee of the Country Club
Trust;
Johanna Collins;
Johanna Rae Long;
John and A. Elrod, individually;
John and Alitea Maruszewski, individually;
John and Crystal Peakes, individually;
John and Janis Nicholas, individually;
John and Lisa Dillard, individually;
Lucille Elrod;
John and Mari Allen, individually;
John and Monica Hartmann, individually;
Nancy Bevans;
John and Nila Ventress, individually;
John and Norma Curtis, individually;
John and Parris Collins, individually;
John and Patricia Essick, individually;
John and Tonya Peralta, individually;
John Battel, Trustee of the John J Battel
Living Trust;
John Broomfield, Trustee of the John
Nicholas Broomfield Trust;
John Edward and Evonne Louise Vacca,
individually;
John F. Johnston and Katherine M.
Johnston, individually as Trustees of the
John Fraser Johnston Family Trust;
John Galaska
John Gutierrez;
John Haigh, Jr.;
John Kertis;
John Laft
John Mutlow;
John Pace, Trustee of the John Brice Pace
Family Trust;
John Richardson;
John Taft Corporation;
John Town
John Vineyard;
John Warner;
John Willingham;
John Winspear;
John Young;
Jon Hanson;
Jonathan and Jacqueline Parker,
individually;

Cross-Defendants

Jonathan and Julie Teichert, individually;
Jonathan Wong and Jan Komura,
individually;
Jose and Imelda Hurtado, individually;
Jose and Lisa Mendez, individually;
Jose Arreola Jr. and Paola Carreno,
individually;
Jose Juarez and Ana Valencia, individually;
Jose Olvera and Alma Valenciano,
individually;
Jose Valadez and Norma Hernandez,
individually;
Joseph and Drenda Pledger, individually;
Joseph and Kathleen Lasalle, individually;
Joseph and Michelle Harwell, individually;
Joseph and Nina Neulight, individually;
Joseph and Shirley Gholson, individually;
Joseph Lynn and Elvira Lilly Barthelemy,
individually and Trustees of the Joseph
Lynn Barthelemy and Elvira Lilly
Barthelemy 2002 Family Trust;
Joseph Palmoutsos as Trustee of the Joseph
Constantinos Palmoutsos Living Trust;
Joseph Polito, Trustee of the Joseph R Polito
1989 Trust;
Joseph Randall, Trustee of the Joseph
Darden Randall Revocable Trust;
Joseph Reseigh;
Joseph Tooker;
Joshua Antelman;
Joshua Moreau;
Joyce and Frank Patota, individually;
Joyce Frenette;
Juan and Gloria Estrada, individually;
Juan and Maria Martinez, individually;
Juan Espinoza and Travis Coker,
individually;
Juana and Henry Murillo; individually;
Julianne Bloomer and Philip Rabe,
individually;
Julie Centeno;
Julio Luna and Debbie Lun, individually;
June Sears, Trustee of the June Katherine
Sears Living Trust;
Jupeto Properties, LLC;
Jurgen Gramckow and Geraldine

Gramckow, individually as Trustees of the
J&G Trust
Justin and Rachael Jayne, individually;
Kac LLC;
Karen L. Hanson and Lawrence S. Hanson,
Trustees of the Hanson L.S. Revocable
Living Trust;
Karen Mendoza, Trustee of the Vork Family
Trust;
Karen Phipps, Trustee of the Phipps Family
Trust;
Karin Dron, Trustee of the Boyd S. Dron
and Karin K. Dron Joint Living Trust;
Karin L. James, Trustee of the James Family
Trust;
Katharine and John Broesamle, individually;
Katherine Patton and Virginia Mcconnell,
individually;
Kathleen and Adam Morrison, individually;
Kathleen and Thomas German, individually;
Kathleen Bachelor;
Kathleen Nolan, Trustee of the Kathleen
Ann Nolan Revocable 2006 Family Trust;
Kathleen Turner and Elizabeth Renn,
individually;
Kathryn Bartholomew, Trustee of the
Kathryn Oconnor Bartholomew Living
Trust;
Kathy Alderman;
Katz Pincetl Orchard, LLC;
Kay Burns;
Kay Dornbusch, Trustee of the The
Dornbusch Family Living Trust;
Keith and Anahid Jewett, individually;
Keith and Robin Lawson, individually;
Keith and Victoria Nightingale,
individually;
Kelley and John Dyer IV, individually;
Kelvin Dodd and Deborah Gomez,
individually;
Ken Collin;
Kenett Niessen;
Kenneth and Anne Boydston, individually;
Kenneth and Brenda Whitteker,
individually;
Kenneth and Carol Fergeson, individually;

Cross-Defendants

Kenneth and Elizabeth Gruber, individually;
Kenneth and Laura Brown, individually;
Kenneth and Maria Baker, individually;
Sarah Van Dyke;
Kenneth Morgan;
Kenneth S. Collins, Trustee of the Frank R. Walker, Jr. Trust;
Kenneth Vadnais;
Kent and Patricia Hardley, individually;
Kern County;
Kevin and Asli Ruf, individually;
Kevin and Jennifer White, individually;
Kevin and Joanne Olsland, individually;
Jodi Dunn;
Kevin Clark
Kevin K. Cox and Mary C. Cox, individually as Trustees of the Cox Family Trust;
Khaled A. Al-Awar and Sheryl L. Al-Awar, individually as Trustees of the K. and S. Al-Awar Family Trust;
Kiki Lyon, Trustee of the Kiki Lyon Living Trust;
Kim Hanna, Trustee of the Hanna Family Trust;
Kim Jirka, Trustee of the Kim Jirka Trust;
Konstantin Demidov;
Krishnamurti Foundation of America;
Kristan Altimus;
Krotona Institute of Theosophy
Kurt and Dayna Roggenstroh, individually;
Kurt and Luisa Neher, individually;
Kurt Patrick Zierhut and Stephanie Lee Zierhut, Co-Trustees of the Living Trust of Kurt Patrick Zierhut and Stephanie Lee Zierhut;
Kyle Brown;
Lance and Donelle Woleslagle, individually;
Lanspring, LP;
Joyce Heath;
Larry Davis;
Larry Hubenthal, individually and as Trustee of the Larry Hubenthal Living Trust;
Larry Hubenthal, Trustee of the Larry Hubenthal Living Trust;
Larry Neff, Trustee of the Larry Neff Trust;

Las Encinas Mobile Home Park;
Laszlo and Sharon Bihari, individually;
Laughing Dog Ranch, LLC;
Laura B. Peck and Andrew D. Viles, individually as Trustees of the William L. and Laura B. Peck Trust - Marital Trust;
Laura Green, Trustee of the Green Survivors Trust;
Laurie Johnson, Trustee of the Laurie A. Johnson Living Trust;
Laurie Smith;
;
Lawrence and Rachel Clevenson, individually;
Lawrence and Sharon McMillan, individually;
Lawrence Hartmann
Lawrence I. and Patricia A. Hartmann, individually as Trustees of the Larry and Pat Hartmann Family Trust;
Lee and Janet Cassel, individually;
Lee Fitzgerald, Trustee of the Lee I Fitzgerald 2007 Revocable Living Trust;
Lee Lebeck;
Lee Rosenbaum, Trustee of the Chief Cornerstone Trust;
Leon and Caroline Pahle, individually;
Leon and Cecelia Carter, individually;
Leonard Fischer;
Kay Rolfe;
Leslee and Terry Gustafson, individually;
Leslie McCleary;
Lester L. and Linda L. Barbee, individually as Trustees of the Lester L. Barbee and Linda L. Barbee Joint Revocable Living Trust;
Liana Harp and Nathan Jones, individually;
Lilian Ruvalcaba;
Linda Chapman, Trustee Linda of the Jean Chapman Living Trust;
Linda Epstein
Linda Griffin;
Linda McLaughlin, Trustee of the Linda Landrieu McLaughlin Living Trust;
Linda Oliver, Trustee of the Linda A Oliver 2005 Revocable Living Trust;

Cross-Defendants

Lipka Richard, Trustee of the Lorraine Trust;
Lisa Clark
Lisa Lopez and Brian Merrill, individually;
Lisa Smith;
Lloyd Smith;
Logan and Misty Hagege, individually;
Logan and Tiffany Gould, individually;
Lois Stone Erburu, as Trustee of the Surviving Spouse's Trust created in the Robert and Lois Erburu Living Trust;
Lon and Margareta Kirkgaard, individually;
Longhorn Lane, LLC;
Lorene Cleary;
Lorenzo Gama and Ylda Cisnero, individually;
Loretta May Williams, aka Loretta May Blackburn, Trustee of the Loretta May Williams Revocable Living Trust;
Lori Schloredt;
Lou and Barton Matthews, individually;
Lou Tomesetta
Louis Gutierrez, Jr. and Irene Gutierrez, individually;
Louis Price;
Louise and Gary Culver, individually;
Louise Konstanzer, Trustee of the Ron and Louise Konstanzer Family Trust;
Louise Tindle, Sole Trustee of the "Bypass Trust" created under the Tindle Trust;
Randall Norman Kirk, individually as Co-Trustee of the "Lucille Jane Conforti Trust";
Luis Herrera and Kimberly Oyama, individually;
Lutheran Church of the Holy Cross of Ojai
Lydia Jimenez;
Lyle and Cecilia Hallblom, individually;
Lyndon Hebenstreit;
Lynn Henne;
Lynn Coleman;
Lynn Gotch and Linda Oliver, individually;
Lynn Pike, Trustee of the Lynn 2016 Trust;
Lysiane Wallis;
M. Snyder;
Malcolm and Brenda Knight, individually;
Malcolm and Kelley McDowell,

individually;
Mandy Macaluso, Trustee of the Living Trust of Mandy Macaluso;
Manuel and Sandy Garcia, individually;
Marcus and Amy Hueppe, individually;
Marcus and Eva Kettles, individually;
Margaret M. Aldrich, Trustee of the Russell F. Aldrich and Margaret M. Aldrich "Decedent's Trust," and Trustee of the Russell F. Aldrich and Margaret M. Aldrich Living Trust;
Margaret Menninger
Margo Kelly, Trustee of the Kelly Trust;
Maria Blasco;
Maria Collins;
Marie W. Wallace, Trustee of the Marie Weismiller Wallace Separate Property Trust;
Marika Zoll;
Marilyn Sweeney, Trustee of the Marilyn Sweeney Revocable Living Trust;
Marilyn Wallace, Trustee of the Marilyn Wallace Separate Property Trust;
Mario Aguirre and Patrice Vernand, individually;
Mario and Shawn Reyes, individually;
Marion and Betty Earnest, individually;
Mark and Colleen Rusin, individually;
Mark and Connie Cline, individually;
Mark and Helen Moskovitz, individually;
Mark and Marcia Albertsen, individually;
Mark and Megan Steffy, individually;
Mark Anthony and Kim Marie Crane, individually;
Mark Bellini;
Mark Saleh
Mark Thompson;
Mark W. Etchart, Trustee of the Mark W. Etchart Separate Property Trust, and Trustee of the Michel A. Etchart Separate Property Trust;
Marsha MacDonald;
Marshall and Dina Murphy, individually;
Martha Fast, Trustee of the Martha L Fast Living Trust;
Martha Laliberte;
Martha Moran;

Cross-Defendants

Martin and Barbara Pops, individually;
Martin and Darian O'brien, individually;
Martin and Linda Gramckow, individually;
Martin and Natalie Ehrlich, individually;
Martin and Patricia Henderson, individually;
Martin Gramckow, Trustee of the Monika G. Huss Irrevocable Trust, Trustee of the Karin W. Gramckow Irrevocable Trust, Trustee of the Kurt J. Gramckow Irrevocable Trust;
Marvel Pierce;
Mary and Thomas Snow, individually;
Mary Bergen, Trustee of the Rosemary Hall Bergen Trust;
Mary Downer, Trustee of the Arthur and Mary Downer Family Trust;
Mary L. Vomund, Trustee of the Mary L. Vomund 1987 Trust;
Mary Morrison;
Mary Thomas, Trustee of The Thomas Survivors Trust;
Mary Walkart and William Hastings, individually;
Mary Wingate, Trustee of the Mary Louise Wingate Trust;
Matilija Canyon Alliance;
Mattawa and Rond Larue Clements, individually;
Matthew and Claudia Wilson, individually;
Matthew and Judy Farmer, individually;
Matthew and Kimberly Hultgen, individually;
Matthew Bowe;
Matthew Dwyer and Colleen Walker, individually;
Matthew Larrew and Jordana Kaban, individually;
Matthew Simon and Amanda Vino, individually;
Max Reed;
Maximiano and Norma Ortiz, individually;
McNell Creek Ranch, a general partnership;
McNell Properties, LLC;
Meiners Oaks Water District
Melesio Ramirez;
Melissa Van Siclen;
Merewether Judson, LLC;
Merl and Kim Melstrand, individually;
Michael and Allison Sedlak, individually;
Michael and Annell La Barge, individually;
Michael and Barbara McCarthy, individually;
Michael Clark;
Michael and Carol Davis, individually;
Michael and Carol Jackson, individually;
Michael and Cindy Boehm, individually;
Michael and Dianna Farrar, individually;
Michael and Hannalore Gresser, individually;
Michael and Heidi Bradbury, individually;
Michael and Kathy Ogden, individually;
Michael and Kim Regan, individually;
Michael and Kimberly Robertson, individually;
Michael and Marie Mctavish, individually;
Michael and Nancy Krumpschmidt, individually;
Michael and Patricia Mcweeney, individually;
Michael Barrett;
Michael and Terri Imwalle, individually;
Michael Boulton
Michael Caldwell
Michael Chambliss;
Michael Coggins Jr. and Cynthia Coggins, individually;
Michael Cromer
Michael Greynald, Trustee of the Greynald Family Trust;
Michael Hoover, Trustee of the Michael Hoover Living Trust;
Michael Kelley;
Michael L. Delamore and Deborah Finley-Delamore, individually as Trustees of the Delamore Finley Family Trust;
Michael L. Rockhold, Trustee of the Michael Rockhold Trust;
Michael Lombardo, Trustee of the Michael Lombardo Living Trust;
Michael Marietta, individually and as Trustee of the Marietta Separate Property Trust;

Cross-Defendants

Michael Purdy, Trustee of the Purdy Family Revocable Trust;
Michael Saleh, Trustee of the Saleh and Lea Saleh 1984 Family Trust;
Michael T. Marshall and Lisa Skyheart Marshall, individually as Trustees of the Marshall Living Trust;
Michael Tello;
Michele Willis and Johanna Collins, individually;
Micky Froelich;
Miguel and Elvia Ramirez, individually;
Miguel Estrada;
Mitchael and Rubeena Breese, individually;
Mitchell and Ana Yount, individually;
Mitchell and Joy Dalbey, individually;
Mitchell and Lisa Myers, individually;
Murelle Stevens, Trustee of the Stevens Family Trust;
Nancy Ferrell, Trustee of the Nancy A. Ferrell Family Trust;
Nancy Graham;
Nancy Jackson, Trustee of the Nancy J. Jackson Living Trust;
Nancy Moore, Trustee of the Nancy Anne Moore Separate Property Trust;
Natalia Moore, Trustee of the Moore Family Trust;
Nathan Allen;
Nathaniel and Suzette O'Grady, individually;
Karen Traudt, individually and as Trustee of the Traudt Family Trust;
Neil and Patricia Friedrichsen, individually;
Neil Kreitman, Trustee of the Neil Kreitman Living Trust;
Nick and Morna Taminich, individually;
Nick Daily;
Nikolas and Julia Krankl, individually;
Nina Menconi;
North Fork Springs Mutual Water Company
Oak Haven, LLC;
Oak View Sanitary District;
Oilfield Service and Truck Co.;
Oilfield Service and Truck, Inc.;
Ojai Assembly of God, Inc., dba Ojai's

Church of the Living Christ, Inc.
Ojai Home, LLC;
Ojai Unified School District;
Ojai Valley Athletic Club;
Ojai Valley Conservancy;
Ojai Valley Land Conservancy;
Ojai Water Conservation District
Ojai-Jackman, LLC;
Old Creek Road Mutual Water Company
Ole Behrendtsen;
Ole Konig
Olga and Trent Jones, individually;
Orin Jr. and Karen Chappell, individually;
Orville Hernvall;
Orville and Pamela Hibdon, individually;
Orville Hernvall, Trustee of Hervnall Orville and Marion Orville Trust;
Oscar Acosta, Trustee of the Acosta Trust;
Oscar and Mary Kaas, individually;
OST Trucks and Cranes;
Oswaldo and Norma Ruiz, individually;
Ovis, LLC;
Pacific Telephone and Telegraph Company;
Pamela Grau, Trustee of the Pamela Grau Living Trust;
Pamela Melone, Trustee of the Pamela M. Melone Living Trust;
Pamela Wood;
Margaret Peake;
Patricia and Edward Lansberg, individually;
Patricia Boan and Alina Hoffman, individually;
Patricia Boan and John Hoffman, individually;
Patricia Cuenot;
Patricia Marshall, Trustee of the Patricia Ann Marshall Trust;
Patricia McGann;
Patricia McPherson;
Patricia Unruhe and Andrew Jarvis, individually;
Patrick and Cathy Pagnusat, individually;
Patrick Henderson and Jessica Maharry, Trustees of the Maharry Henderson Family Trust;
Patrick Tumamait;

Cross-Defendants

Paul and Aldine Hennigan, individually;
Paul and Angela Booth, individually;
Paul and Ashley Ramsey, individually;
Paul and Janet Bailey, individually;
Paul and June Clem, individually;
Paul and Kim Robie, individually;
Paul and Maelyn Ebert, individually;
Paul and Maria Lozano, individually;
Paul and Martha Medlar, individually;
Paul and Opal Skaggs, individually;
Paul and Sally Centeno, individually;
Paul Fonteyn, individually;
Paul Holahan and Julie Grist, individually;
Paul Lepiane and Bo Bengtson, individually;
Paula Brown, Trustee of the Paula Jean Brown Trust;
Paula Lasiter;
Paula McCullough, Trustee of the Paula J. McCullough Living Trust;
Pauline Mercado, Trustee of the Pauline Mercado Revocable Trust;
Pedro Cisneros;
Pedro Tepesano;
Per and Inge Christiansen, individually;
Perry Family, LLC;
Peter and Kelli Freiberg, individually;
Peter and Linda Daprix, individually;
Peter and Norma Dworkis, individually;
Peter and Robin Shedlosky, individually;
Peter Cambier, Trustee of the Peter and Marilyn Cambier Trust;
Peter Dufau;
Peter Passell;
Peter Schey, LLC;
Peter Strauss and Rachel Ticotin, individually;
Peuvlin Vong;
Philip and Darylyn Long, individually;
Philip and Delia Smith, individually;
Philip Ferrante Jr. and Nicole Aversa-Ferrante, individually;
Philippe Rousseau and Kimberly Shobe, individually;
Phyllis Courtney;
Preparatory Villanova;
Quint Morris;

Rachel Kondor and Brian Segee, individually;
Rafael and Magdalena Villalpando, individually;
Rafael Hernandez;
Raffi J. Mesrobian and Myrna R. Mesrobian, individually as Trustees of the Mesrobian Family Trust;
Rainer Buschmann and John Johnston, individually;
Ralph and Lynne Lundy, individually;
Ramaa Mosley;
Ramona L. Andrew, Trustee of the Ramona L. Andrews Trust;
Rancho Arnaz, LLC;
Rancho Casitas, LLC;
Rancho De Cielo Mutual Water Company
Rancho Matilija Mutual Water Company
Rancho Sueno, LLC;
Randal R. O'Connor, Successor Trustee of the Red Clay Trust, and Successor Trustee of the Le Cedre Trust;
Ranjit Sevaprakasam;
Ray Hall, Trustee-in-Trust of the 30 Acre Trust;
Raymond and Annette West, individually;
Raymond and Esther Kardly, individually;
Raymond and Eva Lyons, individually;
Raymond Magee and Linda Taylor, individually;
RDK Land, LLC;
Rebecca Adams;
Rebecca Collins
Red Mountain Land and Farming, LLC;
Reeves Orchard, LLC;
Refugio Gomez;
Rex and Heidi Lanning, individually;
Reynolds Fleming;
Ricardo Gonzalez;
Richard and Alexandra Dubeau, individually;
Richard and Billie Sumner, individually;
Richard and Cynthia Robinett, individually;
Richard and Emily Cargill, individually;
Richard and Emma Kline, individually;
Richard and Katherine Godfrey,

Cross-Defendants

individually;
Richard and Laura Mancilla, individually;
Richard and Lee Harper, individually;
Richard and Marilyn Kallas, individually;
Richard and Nancy Francis, individually;
Teresa Turner;
Richard Bolton;
Richard Dodson, Trustee of the Richard E. Dodson 2010 Revocable Trust;
Richard Francis;
Richard Frey and Wendy Appleby, individually;
Richard Gilleland
Richard Lowen;
Richard Magana;
Richard Mathieu and Claudia Herrera Mathieu, individually;
Richard McGrath, Trustee of the Richard K McGrath Living Trust;
Richard Michael and Margaret Kenny, individually;
Richard Sojka;
Richard Wiles and Peggy Carey, individually;
Rincon Water and Road Works
Robert Alan and Stacey Jean Boyd, individually;
Robert and Anamaria Schmid, individually;
Anna J. Auric, individually as Trustee of the Auric Anna J. Family Trust;
Anna J. Auric, individually as Trustee of the Auric Revocable Trust of 1999;
Robert and Antoinette Tivy, individually;
Robert and Carolyn Jarboe, individually;
Robert and Diana Petropulos, individually;
Robert and Dianne Stone, individually;
Robert and Dominique Daniels, individually;
Robert and Dora Balitzer, individually;
Robert and Emily Martin, individually;
Robert and Gaea Cannaday, individually;
Robert and Geraldine Hunsaker, individually;
Robert and Jacqueline McDaniel, individually;
Robert and Janice Hastie, individually;
Robert and Judith Clark, individually;
Robert and Marilyn Salas, individually;
Robert and Maureen Young, individually;
Robert and Nickey Gregory, individually;
Robert and Patricia Mcfall, individually;
Robert and Sheila Ghen, individually;
Robert and Sonia Rodarte, individually;
Robert and Susan Bennitt, individually;
Robert and Taundra Roddick, individually;
Robert C. Davis, Jr.
Robert Calder Davis, Jr., Trustee of the Robert Davis Surviving Spouse's Trust, Trustee of the Davis Family Bypass Trust and Trustee of the Davis Family Trust;
Robert Dekkers;
Robert Erickson and Ronald Wilson, individually;
Robert Grasmere;
Robert Levin and Lisa Solinas, individually;
Robert Mark and Lorraine Melisa Lovato, individually;
Robert OConnor;
Robert Petrin and Beate Schickerling, individually;
Robert Polidori and Brittany Sanders, individually;
Robert S. Young, Trustee of the Young Trust;
Roberto and Maria Alonso, individually;
Robin Bernhoft
Rocky Mann;
Roderick and Joyce Greene, individually;
Roger and Susan Dickens, individually;
Roger Haley; Trustee of the Roger and Christina Haley Survivors Trust;
Roger Walker;
Rogers-Cooper Memorial Foundation;
Bette Bluhm;
Ronald and Janis Calkins, individually;
Ronald and Julia Bruns, individually;
Ronald Blood and Linda Jordan, individually;
Ronald Kaplan and Cynthia Daniels, individually;
Ronald L.R. Hill and Debi R. Hill, Trustees of the R&D Hill Family Trust;
Ronald Vogt;

Cross-Defendants

Rosemarie Singer;
Rosemary Payne, Trustee of the Rosemary Payne Trust;
Ross Anderson;
Rowland A. Hill II and Brenda M. Hill, individually as Trustees of the Trust dated November 1, 2002;
Ruben and Marisa Martinez, individually;
Ruben Chavez;
Ruben Magana and Janette Lupercio, individually;
Rudolph and Carol Saldamando, individually;
Rudy Baez;
Laura Alford;
Golden Wiley;
Russell James Hall, Trustee of the Russell James Hall Family Trust;
Russell Waldrop, Trustee of the Russell B. Waldrop Living Trust;
Sabino and Nicki Perez, individually;
Sabrina Venskus, Trustee of the Sabrina Venskus Living Trust;
Sally Crain;
Salvatore Scarpato;
Sam and Debbie Tucker, individually;
Samuel and Joanna Schindel, individually;
Samuel Eaton;
Santa Ana Ranch, Inc.;
Sarah Young;
Saunie Krewson;
Scott Alan and Eva Prince Weiss, individually;
Scott and Aki Freshman, individually;
Scott and Bernadette King, individually;
Scott and Brittany Denton, individually;
Scott and Carol Rasmussen, individually;
Scott and Keela Allison, individually;
Scott and Michele Supan;
Scott Chasse, Trustee of the Scott Chasse Revocable Living Trust;
Scott Forsyth and Joy Fedele, individually;
Scott Gregory Erockson and Hannah Beth Guzik, individually;
Scott Lundy, Trustee of the Scott Lundy Trust;

Scott Luttenberg
Scott Luttenberger and Natasha Wilcox, individually;
Scott R. Johnson and Margaret Bates, individually;
Scottie Monical;
Sean and Leslie Bennett, individually;
Senior Canyon Mutual Water Company
Serafin and Martha Flores, individually;
Serafin Calderon and Blanca Ortiz, individually;
Sevan Gerard;
Shahram Shahrokhfar and Dina Nava, individually;
Shane and Amy Watkins, individually;
Shane Nash;
Shanks Investment Group, LLC;
Sharon and Bruce Spencer, individually;
Sharon Brown, Trustee of the Sharon Brown Living Trust;
Shaun and Daisy Garman, individually;
Shawn Fulbright, Trustee of the Shawn Fulbright 2014 Revocable Trust;
Shawn Reed;
Shell Oil Co.;
Sherrice and John Weeces, individually;
Sherrie Daily;
Sheryl Shushan;
Shippee, LLC;
Shirley M. Palmer, Trustee of the Shirley Palmer Revocable Trust;
Shlomo Raz
Shull Bonsall, Jr., Trustee of the Shull Bonsall Family Trust;
Sidney and Jayne Rice, individually;
Siete Robles Mutual Water Company
Sisar Mutual Water Company
Skynest, LLC;
Societe d'Investissement Immobiliers et Financiers Franco-Allemand, a French corporation;
Soule Park Golf Course, Ltd.
Southern California Associated Investors, Ltd.;
Southern California Association of Seventh Day Adventists;

Cross-Defendants

Southern California Edison Co.;
Spencer and Bailey Hill, individually;
SRPS, LP;
St. Joseph's Associates Of Ojai, California,
Inc.
Stacy Cadenasso;
Stanley and Theresa Wyatt, individually;
Stanley and W Hubbell, individually;
Linda Roslansky, individually as Trustee of
the Roslansky Family Trust;
State of California, Department of
Transportation;
Stefan Kozak and Ana Lopes, individually;
Stephanie and Cheryl Beas, individually;
Stephanie Gustafson
Stephen and Carin Kally, individually;
Stephen and Cindy Barrack, individually;
Stephen Carr and Debra Gill, individually;
Stephen Huyler
Stephen M. Johnson, Trustee of the Stephen
M. Johnson Living Trust;
Stephen Matzkin, Trustee of the Stephen
Matzkin Trust;
Stephen Mitchell
Stephen Sanford;
Stephen Turner, Trustee of the Stephen R.
Turner Living Trust;
Stephen Zane Fraser;
Steven and Brent Kanaly, individually;
Steven and Christine Vaughan, individually;
Steven and Ka Rapholz, individually;
Steven and Karen Erickson, individually;
Steven and Krissell Dutter, individually;
Steven Elliot Edelson, Trustee of the Los
Angeles Entertainment Trust;
Steven P. Smith and Lynn Davis-Smith,
individually as Trustees of the Smith
Revocable Living Trust;
Stuart Rupp;
Sudarshan Gautam;
Sumeet Bhatia and Michael Mcdonald,
individually;
Sumpuran Khalsa, Trustee of the Sumpuran
S. Khalsa Living Trust;
Suria and John Gottesman, individually;
Susan Bee, Trustee of the John and Susan

Bee Family Trust;
Susan Conley, Trustee of the William and
Susan Conley Family Trust;
Susan Diller, Trustee of the Susan J Diller
Trust;
Susan Garand;
Susan Gary;
Susan Gruber, individually and as Trustee of
the Susan Gruber Living Trust;
Susan M. Ralph, Trustee of the Ralph Trust;
Susan Moll;
Susan Webster;
Susan Yarnell;
Sushma Gujral;
Suzanne Harvey, individually and as Trustee
of the Suzanne G. Harvey Revocable Trust;
Suzanne Rhodes, Trustee of the Bateman-
Rhodes Family Trust;
Sylvia Raz
T Bone Holdings, LLC;
T. Snyder
Tamarra Barbey;
Tane Charles Arnold, individually and as
Trustee of the Tane C. Arnold 2006 Living
Trust
Tanya Smith and Michael Montano,
individually;
Ted Robinson, Trustee of the Robinson
Family Trust;
Teen Challenge of Southern California, Inc.;
Telos Development Ojai, LLC;
Telos, LLC
Terra Crowley;
Terrance O'Connor and Kathy Franklin,
individually;
Terrie Longo;
Terry Coultas Wilson;
Terry Wilson, Trustee of the Terry Coultas
Wilson Living Trust;
Thacher Creek Citrus, LLC, a California
Corporation
The Baptiste Foundation;
The Ojai Rental, LLC;
The Ojai Valley Land Conservancy;
The Roman Catholic Archbishop of Los
Angeles, a sole corporation;

Cross-Defendants

The Thacher School
Theodor and Lore Exner, individually;
Theodore and Judy Lucas, individually;
Theodore and Norma Schneider,
individually;
Theodore and Tracy Mandryk, individually;
Theodore Willis Malos, Jr. and Pearl B.
Malos, individually and as Trustees of the
Malos Family Trust,;
Thomas and Christine Reed, individually;
Thomas and Cynthia Carver, individually;
Thomas and Jadona Collier Harper,
individually;
Thomas and Nanette Benbrook,
individually;
Thomas and Nikki Young, individually;
Thomas Collins
Thomas Jackson;
Thomas Tamplin and Michelle Wells,
individually;
Three Oaks, LLC;
Three Sisters Orchard, LP;
Tico Mutual Water Company
Tim Krout
Timothy and Cheryl Austin, individually;
Timothy and Kathleen McHugh,
individually;
Timothy and Kathryn Moran, individually;
Timothy and Linda Turner, individually;
Timothy and Mary Williamson,
individually;
Timothy and Nicole Beckett, individually;
Timothy Jones;
Tobias and Tania Parker, individually;
Todd and Christina McGinley, individually;
Todd Henard and Kibhi Marie Henard,
individually;
Todd Tullett, Trustee of the Todd Tullett
Revocable Living Trust;
Tom and Nancy Roland, individually;
Tony and Heather Carlos, individually;
Topa Topa Ranch Company, LLC
Tracey and Melanie Boulton, individually;
Trent and Kris Greco, individually;
Troy Becker
Trudie Town
Tyler and Maria Barrell, individually;
Tyler Labine and Carrie Ruscheinsky,
individually;
Uldine and Fabien Castel, individually;
Uriel and Chieko Lopez, individually;
US Natural Resources, Inc.;
Vanlaw Investment Corp.;
Ventura County Watershed Protection
District
Ventura Land Trust;
Ventura River Water District
Ventura Unified School District;
Vicente Guzman;
Vicki Daw;
Vicki L. Hollingsworth, Trustee of the
Hollingsworth Trust;
Victor and Sheryl Sanchez, individually;
Victor Timar
Victoria and John Junkin, individually;
Vida Vida, Trustee of the Vida Family
Trust;
Vijay and Neeta Patel, individually;
Virginia I. Williamson, individually and as
Trustee of Trust of Virginia I. Williamson;
Virginia M. McCarthy, Trustee of the
Virginia M. McCarthy Living Trust;
Virginia Siegfried, Trustee of the Virginia
A. Siegfried Revocable Trust;
Virginia Trevino;
Vivian Arber;
Vivienne Moody;
Walid A. Alawar, Trustee of the Walid A.
Alawar Living Trust;
Walter and Evelyn Golis, individually;
Walter and Linda Boysiewick, individually;
Walter McGowan, Individually and as
Trustee of the Walter Robert McGowan
1995 Trust;
Wanda and Meniford Canterbury,
individually;
Warren Heath;
Watermark Carp II LLC;
Wayne Francis
Wayne Tate and Janice Priebe-Tate,
individually as Trustees of the Tate Trust, as
community property;

Cross-Defendants

Weiss Investment Properties;
Wendy and David Churchill, individually;
Wesley Scott and Kasey Perins,
individually;
West Crag Glen Smith, Successor Trustee of
the Melissa Irene Elizabeth Smith
Irrevocable Special Needs Trust - 1993;
Willi and Stefanie U. Coeler, individually
and as Trustees of the W. and S. Coeler
Living Trust;
William and Cheryl Meade, individually;
William and Helen Peck, individually;
William and Irene Snively, individually;
William and Jacqueline Boch, individually;
William and Kimbra Carnaghe, individually;
William and Lorraine Walsh, individually;
William and Melinda Welch, individually;
William and Paula Stevens, individually;
William and Susan Luther, individually;
William B. Hart, Jr., Trustee of the
Constance Eaton Personal Residence Trust;
William Bailey, Trustee of the William F.
Bailey Living Trust;
William Brothers, Trustee of the William C.
Brothers Living Trust;
William Erickson;
William F. Newton and Charlotte R.
Newton, individually as Trustees of the
Newton Family Trust;
William Gilbreth, Trustee of the William J.
Gilbreth Trust;
William Hawksworth;
William L. Reynolds;
William Loughboro;
William Lowes;
William Rusin
William Starr;
William White, Trustee of the William C.
White Trust;
William Whorf;
Wilmetta Davis;
Winfried and Carol Boersch, individually;
Wood-Claeyssens Foundation
Wynn Johnson and Lisa Ayala Johnson,
individually;
Yan and Alili Comment, individually;

Yarrow and Caroline Cheney, individually;
Yitzhak and Smadar Orlans, individually;
Yong Yi;
Yvette Marie and Daniel Joseph Sinohui,
individually;
Yvon and Malinda Chouinard, individually;
Zachary and Diane Totten, individually
Zobeida Olson
Palm Road, LLC, a Delaware limited
liability company, Roe 1;
10740 Chismahoo LLC, a California limited
liability company, Roe 2;
11480 Sulphur Mountain Road, LLC, a
California limited liability company, Roe 3;
Aisholz LLC, a California limited liability
company, Roe 4;
Joellen Alflen, Trustee of The Joellen Alflen
Separate Property Revocable Trust, Roe 5;
Hien Dao Andren, Trustee of The Andren
Family Trust, Roe 6;
Linh T. Andren, individually, Roe 7;
Robert Kinglsey Andren, Trustee of The
Andren Family Trust, Roe 8;
Son T. Andren, individually, Roe 9;
Charles H. Andrews III, Trustee of The
Andrews Trust, Roe 10;
Susan M. Andrews, Trustee of The Andrews
Trust, Roe 11;
Christine J. Bailey, Trustee of The William
F. Bailey Living Trust, Roe 12;
Rocky J. Baio, individually , Roe 13;
Debra Bandy, Trustee of The Bandy Living
Trust, Roe 14;
Timothy Bandy, Trustee of The Bandy
Living Trust, Roe 15;
Nicholas F. Barham, individually, Roe 16;
Alicia S Beaty, individually, Roe 17;
J. Terry Beckett, Trustee of The Beckett
Family Trust , Roe 18;
Joy Annette Edwards-Beckett, Trustee of
The Beckett Family Trust , Roe 19;
Kelly Beckett, individually, Roe 20;
June Laurie Behar, Trustee of The Behar
Living Trust, Roe 21;
Sheldon Behar, Trustee of The Behar Living
Trust, Roe 22;
Carolyn D. Bennett, Trustee of The Bennett
Family Trust, Roe 23;
James S. Bennett, Trustee of The Bennett
Family Trust, Roe 24;
Big Bagga Acorns LLC, a California limited
liability company, Roe 25;

Cross-Defendants

Black Equine Investments, LLC, a California limited liability company, Roe 26;
Loa E. Bliss, Trustee of The Loa E. Bliss 2006 Revocable Trust, Roe 27;
Boulevard Haussmann LLC, a California limited liability company, Roe 28;
Ventura County Council of the Boy Scouts of America, a California nonprofit public benefit corporation, Roe 29;
Claire S. Brian, Trustee of The Brad & Claire Brian Living Trust, Roe 30;
Brad D. Brian, Trustee of The Brad & Claire Brian Living Trust, Roe 31;
Robert Brindis, individually, Roe 32;
Keith R. Brooks, Trustee of The Keith R. Brooks and Ruth E. Brooks Revocable Trust, Roe 33;
Ruth E. Brooks, Trustee of The Keith R. Brooks and Ruth E. Brooks Revocable Trust, Roe 34;
Tanny B. Brooks, individually, Roe 35;
Bonnie J. Delperdang-Brown, Trustee of The Bonnie J. Delperdang-Brown Trust, Roe 36;
Emily V. Brown, Trustee of The Restated Emily V. Brown Intervivos Trust, Roe 37;
BT Ranch Ojai, LLC, a California limited liability company, Roe 38;
California Department of Parks and Recreation, a division of the State of California, Roe 39;
Charles Gene Cantello, Trustee of The Charles Gene and Marilyn J. Cantello Living Trust, Roe 40;
Marilyn J. Cantello, Trustee of The Charles Gene and Marilyn J. Cantello Living Trust, Roe 41;
Susan K. Capper, Trustee of The Capper Trust Dated August 28, 2003, Roe 42;
Gordon R. Carolin, individually, Roe 43;
Ileana Cataldo, Trustee of The Cataldo Family Living Trust, Roe 44;
John George Cataldo, Trustee of The Cataldo Family Living Trust, Roe 45;
CFC Land Inc., a California corporation, Roe 46;
Marsha Kee Strong-Chandler, individually, Roe 47;
Bruce Allen Chernof, Trustee of The Chernof/Garcia Living Trust, Roe 48;
Chevron U.S.A. Inc., a Pennsylvania corporation, Roe 49;
James E. Clark II, Trustee of The James E.

Clark II Family Trust, Roe 50;
Leslie L. Clark, Trustee of The Leslie L. Clark Trust, Roe 51;
Mary Claire Clark, Trustee of The James E. Clark II Family Trust, Roe 52;
Catherine A. Collins, individually, Roe 53;
Sean D. Collins, individually, Roe 54;
Pamela Cooke, Successor Trustee of The Cooke Family Trust, Roe 55;
Edward J. Conner, Trustee of The Edward J. Conner Trust, Roe 56;
Angela Courtin, individually, Roe 57;
Joseph Davy, individually, Roe 58;
Patricia A. Davy, individually, Roe 59;
Tracey Davy, individually, Roe 60;
Lauren Deneen, individually, Roe 61;
Paul Deneen, individually, Roe 62;
Valerie Anne Giscard D'Estaing, Trustee of The Fixot-Giscard D'Estaing Family Trust, Roe 63;
Patricia Clark Doerner, Trustee of The Richard E. Doerner and Patricia Clark Doerner 2003 Family Trust, Roe 64;
Richard Doerner, Trustee of The Richard E. Doerner and Patricia Clark Doerner 2003 Family Trust, Roe 65;
Joaquin Dominguez, individually, Roe 66;
Tray R. Droop, individually, Roe 67;
Niall Donnelly, individually, Roe 68;
Donald Dufau, Trustee of The Donald D. Dufau Family Trust, Roe 69;
Roberta Dufau, Trustee of The Donald D. Dufau Family Trust, Roe 70;
Jennifer Eckersley, Trustee of The John Scott and Jennifer Jane Eckersley 2004 Family Trust, Roe 71;
John Eckersley, Trustee of The John Scott and Jennifer Jane Eckersley 2004 Family Trust, Roe 72;
Kathy Entzel, Trustee of The Entzel Trust, Roe 73;
Nathan Entzel, Trustee of The Entzel Trust, Roe 74;
Mary A. Ertl, individually, Roe 75;
Maria Olimpia Feig, Trustee of The Steve and Maria Feig Living Trust, Roe 76;
Steven Norman Feig, Trustee of The Steve and Maria Feig Living Trust, Roe 77;
Bernard Fixot, Trustee of The Fixot-Giscard D'Estaing Family Trust, Roe 78;
Janet K. Fredrick, Trustee of The Fredrick Family Marital Trust and Fredrick Family Exemption Trust, Roe 79;
Carl Fout, Trustee of The Carl Fout 2018

Cross-Defendants

Trust, Roe 80;
Richard Franklin, Trustee of The Richard E. Franklin and Yvette M. Franklin Revocable Trust, Roe 81;
Yvette Franklin, Trustee of The Richard E. Franklin and Yvette M. Franklin Revocable Trust, Roe 82;
W. Eric Fulton, Trustee of The Elizabeth Mazell Trust, Roe 83;
Mandy K. Gaddie, individually, Roe 84;
William E. Gaddie II, individually, Roe 85;
Joseph Gamm, Trustee of The Joseph Gamm and Victoria J. Gamm Revocable Trust, Roe 86;
Victoria J. Gamm, Trustee of The Joseph Gamm and Victoria J. Gamm Revocable Trust, Roe 87;
Norman B. Garber, individually, Roe 88;
Daniel Garcia, Trustee of The Chernof/Garcia Living Trust, Roe 89;
Manuel A. Garcia, Trustee of The Sulphur Mountain Ranch Trust, Roe 90;
Stephen J. Garcia, Trustee of The Sulphur Mountain Ranch Trust, Roe 91;
Gloria Gerace, individually, Roe 92;
Benjamin Gilbert, individually, Roe 93;
David A. Gilbert, Trustee of The Loa E. Bliss 2006 Revocable Trust, Roe 94;
Aletheia Gooden, Trustee of The Quick/Gooden Family Trust, Roe 95;
Robert L. Goddard, individually, Roe 96;
Moshe Graber, Trustee of The Rain Trust, Roe 97;
Gail Graham, individually, Roe 98;
Zachary W. Griffin, III, Trustee of The Zachary W. Griffin, III Living Trust, Roe 99;
Gerrold Grigsby, individually, Roe 100;
Karen Grigsby, individually, Roe 101;
Guadalupe Guzman, individually, Roe 102;
Ofelia E. Guzman, individually, Roe 103;
James Hall, individually, Roe 104;
Marcia Hall, individually, Roe 105;
Hammond Canyon I, LLC, a California corporation, Roe 106;
Ralph Hansen, individually, Roe 107;
Sandra Hansen, individually, Roe 108;
Happy Valley Foundation, a California corporation, Roe 109;
Jana C. Hedman, Trustee of The Hedman Trust, Roe 110;
Ira Paul Heilveil, Trustee of The Heilveil Family Trust, Roe 111;
Marsha Jeanne McKeon Heilveil, Trustee of The Heilveil Family Trust, Roe 112;
C.B. Heller, Trustee of The Heller Family Trust, Roe 113;
Miranda Heller, Trustee of The Heller Family Trust, Roe 114;
Jennie Hilliger, Trustee of The Jorgenson Estate Trust, Roe 115;
Holguin Family Ventures, LLC, a California limited liability company, Roe 116;
Brian E. Holly, individually, Roe 117;
Camille Carlson-Holly, individually, Roe 118;
Douglas J. Homze, individually, Roe 119;
Sharon M. Homze, individually, Roe 120;
Helen Huyler, individually, Roe 121;
Amira J. Ingram, individually, Roe 122;
Arthur T. Jarvis III, Trustee of The Arthur T. Jarvis III Separate Property Trust, Roe 123;
Jessica Jeffrey, individually, Roe 124;
JLA, LLC, a Delaware limited liability company, Roe 125;
Jonesy-B Limited Partnership, a California limited partnership, Roe 126;
Domlin A. Juul, Trustee of The Domlin A. Juul Trust, Roe 127;
Paula Kaiser, individually, Roe 128;
Thomas Kaiser, individually, Roe 129;
Soheila Kolahi, individually, Roe 130;
David Laag, Successor Trustee of The Arthur E. Laag Family 1978 Trust, Roe 131;
Elizabeth Anne Lane, Trustee of The Moody/Lane Family Trust, Roe 132;
Beverly L. Lanning, Trustee of The Lanning Family Survivor's Trust, Roe 133;
Eugene Larson, Trustee of The Larson Living Trust, Roe 134;
Jacqueline Larson, Trustee of The Larson Living Trust, Roe 135;
Steven A. Lasiter, individually, Roe 136;
John Lee, individually, Roe 137;
Gail M. Light, individually, Roe 138;
Michael T. Lindsay, individually, Roe 139;
Susan L. Lindsay, individually, Roe 140;
Catherine M. Logan, Successor Trustee of The Feeney Family Trust, Roe 141;
Gunnar Lovelace, Trustee of The Gunnar Lovelace Revocable Trust, Roe 142;
John Lee, individually, Roe 143;
Richard C. Loy, Trustee of The Loy Family Trust, Roe 144;
Virginia N. Loy, Trustee of The Loy Family Trust, Roe 145;
Robin Luttenberger, individually, Roe 146;

Cross-Defendants

Linda J.G. MacDougall, Trustee of The Linda J.G. MacDougall Living Trust, Roe 147;
Elizabeth Mallinson, Trustee of The Mallinson-Temmel Living Trust, Roe 148;
Mike Marietta, Trustee of The Marietta Living Trust, Roe 149;
Michelle Mason, individually, Roe 150;
Matilija Canyon Properties, a California limited partnership, Roe 151;
Matilija Center, LLC, a California limited liability company, Roe 152;
Matilija Investment Property, LLC, Roe 153;
Dominick McCormick, Trustee of The Dominick and Stefanie McCormick Trust, Roe 154;
Stefanie McCormick, Trustee of The Dominick and Stefanie McCormick Trust, Roe 155;
Meditation Groups, Inc., a California non-profit public benefit corporation, Roe 156;
Meher Mount Corporation, a California corporation, Roe 157;
Baulio Mejia, individually, Roe 158;
Rosamaria Mejia, individually, Roe 159;
Curtis Menefee, individually, Roe 160;
Violette Menefee, individually, Roe 161;
Lisane S. Menezes, Trustee of The Menezes Community Property Trust, Roe 162;
Voltaire Gustavo K. Menezes, Trustee of The Menezes Community Property Trust, Roe 163;
Justin M Mesker, individually, Roe 164;
John Minkel, individually, Roe 165;
Theresa Minkel, individually, Roe 166;
Thomas Molyneux, individually, Roe 167;
Thomas Mone, individually, Roe 168;
Joel Alan Moody, Trustee of The Moody/Lane Family Trust, Roe 169;
Bethany A. Moore, individually, Roe 170;
Juan J. Morales, individually, Roe 171;
Bradley A. Morrice, individually, Roe 172;
Walter W. Mosher, Jr, Trustee of The Walter W. Mosher, Jr. Living Trust, Roe 173;
Walter W. Mosher, Jr., individually, Roe 174;
Rebecca Mosher, individually, Roe 175;
Suzanne Naegle, Trustee of The Sue Naegle 2018 Trust, Roe 176;
New Civilization, a California corporation, Roe 177;
Ojai Valley School, a California corporation, Roe 178;
Linda F. Olive, Trustee of The Linda F. Olive 2017 Trust, Roe 179;
Joanne P. Oslund, individually, Roe 180;
Kevin G. Oslund, individually, Roe 181;
G. Oviatt, individually, Roe 182;
Phyllis J. Oviatt, individually, Roe 183;
Jodie Suzanne Ozatar, Trustee of The California Ozatar Family Trust, Roe 184;
Michael Ray Ozatar, Trustee of The California Ozatar Family Trust, Roe 185;
Johnny Park, individually, Roe 186;
Iiona M. Pecel, Trustee of The Pecel Trust, Roe 187;
John L. Pecel, Trustee of The Pecel Trust, Roe 188;
Deborah B. Perry, individually, Roe 189;
Justin Peters, individually, Roe 190;
Stacey Peters, individually, Roe 191;
Ngoc T. Petrarca, individually, Roe 192;
Emily Wilson Prather, Trustee of The Frank Lee Prather and Emily Wilson Prather Family Trust, Roe 193;
Frank Lee Prather, Trustee of The Frank Lee Prather and Emily Wilson Prather Family Trust, Roe 194;
Jan Preiczner, individually, Roe 195;
Louis Preiczner, individually, Roe 196;
Michael W. Price, Trustee of The Michael W. Price Trust, Roe 197;
Emmanuelle Pytka, individually, Roe 198;
Trevor Quirk, Trustee of The Quick/Gooden Family Trust, Roe 199;
Ellen Rakieten, individually, Roe 200;
Rancho Dos Rios, LLC, a California limited liability company, Roe 201;
Paul J. Reep, Trustee of The Reep Family Trust, Roe 202;
Sheila Reep, Trustee of The Reep Family Trust, Roe 203;
Andra Rich, Trustee of The Andrea Rich Living Trust, Roe 204;
Jason Robinson, individually, Roe 205;
Richard Holt Robinson, individually, Roe 206;
Shane Robinson, individually, Roe 207;
Christel Rogero, individually, Roe 208;
Larry Rogero, individually, Roe 209;
Richard Wayne Roll, Trustee of The Richard Wayne Roll and Susan Geisel Roll Revocable 2004 Trust, Roe 210;
Susan Geisel Roll, Trustee of The Richard Wayne Roll and Susan Geisel Roll Revocable 2004 Trust, Roe 211;

Cross-Defendants

Robin K. Roy, Trustee of The RZF Trust, Roe 212;
Rush Family Limited Partnership, a California limited partnership, Roe 213;
James Jay Seltenreich, Trustee of The Seltenreich Family Trust, Roe 214;
Janice Seltenreich, Trustee of The Seltenreich Family Trust, Roe 215;
Nancy Seltzer, Trustee of The Nancy Seltzer Living Trust, Roe 216;
Seneca Gardens Limited, a California limited partnership, Roe 217;
Sandra Shinall, individually, Roe 218;
Frederick M. Silvers, individually, Roe 219;
Alireza Sizdahkhani, individually, Roe 220;
Tabandeh Sizdahkhani, individually, Roe 221;
Amir Mansour Shahparaki, Trustee of The 2009 Amir Mansour Shahparaki and Jean Alice Hamilton Welsh Revocable Trust, Roe 222;
Larry J. Shellnut, Trustee of The Shellnut Trust, Roe 223;
Margaret R. Shellnut, Trustee of The Shellnut Trust, Roe 224;
Sheron LLC, a California limited liability company, Roe 225;
Eitan Sloustcher, individually, Roe 226;
Sara Sloustcher, individually, Roe 227;
Bradley W. Smith, individually, Roe 228;
Robert Smith, individually, Roe 229;
Stacy Smith, individually, Roe 230;
Stephen Temmel, Trustee of The Mallinson-Temmel Living Trust, Roe 231;
Marjorie Tezak, individually, Roe 232;
Elisabeth K. Treadwell, individually, Roe 233;
Alexander Treadwell, individually, Roe 234;
Tropico (2004), LLC, a Delaware limited liability company, Roe 235;
John T. Vangel, Trustee of The Vangel Trust, Roe 236;
Ysabel Vega, individually, Roe 237;
Ventura Industrial Properties II, LLC, a California limited liability company, Roe 238;
Karon O. Vereen, individually, Roe 239;
VMHP L.P., a California limited partnership, Roe 240;
Charles L. Ward III, Co-Trustee of The Ward-Lombardo Living Trust, Roe 241;
Jean Marie Webster, Trustee of The Roger E. and Jean-Marie Webster Trust, Roe 242;
Roger E. Webster, Trustee of The Roger E. and Jean-Marie Webster Trust, Roe 243;
Jean Alice Hamilton Welsh, Trustee of The 2009 Amir Mansour Shahparaki and Jean Alice Hamilton Welsh Revocable Trust, Roe 244;
Dura Milton Williams, Trustee of The Dura Milton Williams and Honor Elizabeth Bliss-Williams Living Trust, Roe 245;
Honor Elizabeth Bliss-Williams, Trustee of The Dura Milton Williams and Honor Elizabeth Bliss-Williams Living Trust, Roe 246;
Robert L. Yanez, Trustee of The Robert L. Yanez Trust, Roe 247;
Susan Young, individually, Roe 248;
Catherine R. Zoi, Trustee of The RZF Trust, Roe 249;
2705 Maricopa LLC, a California limited liability company, Roe 250;
4205 Thacher Road LLC, a Delaware limited liability company, Roe 251;
Richard Adams, Trustee of The Richard N. Adams and Verna Joy Adams Revocable Trust, Roe 252;
Verna Adams, Trustee of The Richard N. Adams and Verna Joy Adams Revocable Trust, Roe 253;
Lori M. Ahlberg, Trustee of The Chris V. Browning and M. Laverne Browning Trust dated September 13, 1990, Roe 254;
Felipe Varela Arredondo, individually, Roe 255;
Arroyo Mobile Home Park LLC, a California limited liability company, Roe 256;
Holly Bakarich, individually, Roe 257;
Baldwin Ranch LLC, a Nevada limited liability company, Roe 258;
Edgar S. Benson, individually, Roe 259;
Nicolas G. Berbari, individually, Roe 260;
Berryessa 1564, LLC, a California limited liability company, Roe 261;
Boulevard Haussmann, LLC, a California limited liability company, Roe 262;
Jennifer Kirsten Brewer, Trustee of The Nathan Ray Brewer and Jennifer Kirsten Brewer Trust of 2014, Roe 263;
Nathan Ray Brewer, Trustee of The Nathan Ray Brewer and Jennifer Kirsten Brewer Trust of 2014, Roe 264;
Lorne M. Buchman, Trustee of The Lorne Buchman Revocable Trust, 2004, Roe 265;
Hinderikus Busz, Trustee of The Hinderikus Busz Revocable Trust, Roe 266;

Cross-Defendants

Samantha Casey, individually, Roe 267;
Channel Island Holdings, LLC, a Delaware limited liability company, Roe 268;
Herbert D. Chisum, individually, Roe 269;
Virgil Clary, individually, Roe 270;
James Congdon, Trustee of The Congdon Family Revocable Trust, Roe 271;
Sandra Congdon, Trustee of The Congdon Family Revocable Trust, Roe 272;
Culbert Family Partnership, Roe 273;
Joshua L. Currier, individually, Roe 274;
Kristen D. Currier, individually, Roe 275;
Leland George Davis, Trustee of The Davis Lee Trust and The First Amended Lee Davis Trust, Roe 276;
Mario Del Nagro, individually, Roe 277;
Maria Depaola, individually, Roe 278;
James Desurra, individually, Roe 279;
John Desurra, individually, Roe 280;
Karen L. Edwards, individually, Roe 281;
Cynthia A. Ellestad, Trustee of The Cynthia Ellestad Trust dated August 22, 2007, Roe 282;
Christopher P. Fabian, individually, Roe 283;
Adam C. Fenn, individually, Roe 284;
Kimberly Fernandez, individually, Roe 285;
Michael Flett, individually, Roe 286;
Gary R. Gallion, Trustee of The Gary and Nancy Gallion Trust, Roe 287;
Nancy L. Gallion, Trustee of The Gary and Nancy Gallion Trust, Roe 288;
Robert Gavula, individually, Roe 289;
Chris W. Gedwed, individually, Roe 290;
Kalli N. Gedwed, individually, Roe 291;
Steven J. Gluck, individually, Roe 292;
Thayer A. Gowdy, individually, Roe 293;
Kristine Griswold, individually, Roe 294;
Ronda Grow, Trustee of The Grow Family Trust, Roe 295;
Michael P. Halsell, individually, Roe 296;
Linda Anne Shufeldt Gidden Haque, Trustee of The Haque Family Trust "A", Roe 297;
Brandon Hansen, individually, Roe 298;
Jamie Hansen, individually, Roe 299;
Meghann L. Haven, individually, Roe 300;
Juan L.R. Hernandez, individually, Roe 301;
Brett Hitchman, Trustee of The George Replogle Statutory Minor's Trust, Roe 302;
Lee Ann Hitchman, Trustee of The George Replogle Statutory Minor's Trust, Roe 303;
Bethalyn Jonker, individually, Roe 304;
Willem Jonker, individually, Roe 305;
Janice Kanellis, individually, Roe 306;
Kerstin C. Kuhn, individually, Roe 307;
Lakeside Housing Partners, LP, a California limited partnership, Roe 308;
Leap of Faith Partners, LLC, a California limited liability company, Roe 309;
Left Coast Property Investments, LLC, a California limited liability company, Roe 310;
Donald A. Lesch, individually, Roe 311;
Sheryl A. Lesch, individually, Roe 312;
Kelsey M. Lindsey, individually, Roe 313;
Matthew D. Lindsey, individually, Roe 314;
Honey Sharp Lippman, Trustee of The Nadia Szold Irrevocable Trust, Roe 315;
Justin T. Lucia, individually, Roe 316;
Patrick N. McCracken, individually, Roe 317;
Jeffrey McManus, individually, Roe 318;
Julie McManus, individually, Roe 319;
Deborah S. Meyer, individually, Roe 320;
Megan Meyer, individually, Roe 321;
Robert Meyer, individually, Roe 322;
Byron Kathleen Mitchell, Trustee of The Stephen Mitchell and Byron Katie Trust Dated June 4, 2002, as amended, Roe 323;
Stephen Mitchell, Trustee of The Stephen Mitchell And Byron Katie Trust Dated June 4, 2002, as amended, Roe 324;
Brent Monsour, individually, Roe 325;
Everest Mueller, Roe 326;
Megan J. Rider-Mueller, individually, Roe 327;
Niji Productions, Inc., a California corporation, Roe 328;
Christopher Noxon, Trustee of The Christopher Noxon Living Trust, Roe 329;
Cheryl Mae Olivere, Trustee of The Cheryl Mae Olivere and James Victor Olivere Trust, Roe 330;
Michele Ouellet, individually, Roe 331;
Pearl Street Associates, LLC, a California limited liability company, Roe 332;
David Pickles, Trustee of The Pickles Family Trust dated December 13, 2016, Roe 333;
Sasha Pickles, Trustee of The Pickles Family Trust dated December 13, 2016, Roe 334;
Jillian Pinto, individually, Roe 335;
Hillary D. Plichter, individually, Roe 336;
Joseph M. Plichter, individually, Roe 337;
Jaime H. Redin, Trustee of The Jaime H.

Cross-Defendants

Redin and Maria De Lourdes Living Trust dated December 17, 2007, Roe 338;
Maria De Lourdes Redin, Trustee of The Jaime H. Redin and Maria De Lourdes Living Trust dated December 17, 2007, Roe 339;
Edward R. Richter, Trustee of The Nadia Szold Irrevocable Trust, Roe 340;
Austin Ringelstein, individually , Roe 341;
Kathleen P. Robertson, individually , Roe 342;
Fatima Robinson, Trustee of The Fatima Robinson Living Trust dated June 2, 2015, Roe 343;
Carmel A Rodriguez, individually , Roe 344;
Haley K. Ryan, individually , Roe 345;
Brian Smith, individually, Roe 346;
Sharon Smith, individually , Roe 347;
Justin Stiegemeyer, Trustee of The 4569 Grand Avenue Trust, Roe 348;
Jason T. Stowell, Trustee of The Stowell Family Trust Dated June 6, 2007, Roe 349;
Nanette Stowell, Trustee of The Stowell Family Trust Dated June 6, 2007, Roe 350;
Dana Stuart, Trustee of The Dana Stuart Trust, Roe 351;
Ann M. Supan, individually , Roe 352;
Scott T. Supan, individually , Roe 353;
Zvi Azriel Swiatycki, Trustee of The Gary Barnett Trust, Roe 354;
Charles J. Swift, individually , Roe 355;
Nicole L. Swift, individually , Roe 356;
Nadia Szold, Trustee of The Nadia Szold Irrevocable Trust, Roe 357;
Pamela N. Tellez, individually , Roe 358;
Brandon S. Titus, individually , Roe 359;
Jessica M. Traviglia, individually , Roe 360;
Alexandro Xavier Varela, individually , Roe 361;
Angelina Manzo Varela, individually , Roe 362;
Scott Warner, individually , Roe 363;
Matthew Waterson, Trustee of The Green Door Trust, Roe 364;
Rachel Waterson, Trustee of The Green Door Trust, Roe 365;
Camren D. Whitlege, individually , Roe 366;
Kelly L. Whitlege, individually , Roe 367;
Daniel Wilber, individually , Roe 368;
Jenna Wilber, individually , Roe 369;
Thomas W. Wilber, individually , Roe 370;
Yvonne Wilber, individually , Roe 371;
Andrew T. Williams, individually , Roe 372;
Iliana V. Dehoyos-Williams, individually, Roe 373;
Rebecca Williams, individually , Roe 374;
Scott Williams, individually , Roe 375;
Alison Wilson, individually , Roe 376;
Kenny Wilson, individually , Roe 377;
Erica B. Winston, individually , Roe 378;
Ramon A. Winston, individually , Roe 379;
Lucas A. Wittig, individually , Roe 380;
Karen M. Avinelis, individually, Roe 381;
Andy Bogetti, Trustee of the Lynne & Andy Bogetti Family Trust dated December 5, 2011, Roe 382;
Lynne Bogetti, Trustee of the Lynne & Andy Bogetti Family Trust dated December 5, 2011, , Roe 383;
Matthew Bogetti, individually, Roe 384;
Nathan A. Bogetti, individually , Roe 385;
Robert P. Bogetti, Sr., Trustee of the Bogetti Family Trust, Roe 386;
Vincent Bogetti, individually, Roe 387;
Canada Larga Ranch, LP, a California limited partnership, as successor to Canada Larga Land & Live Company, Roe 388;
Cedarfield Capital, LLC, a Delaware limited liability company, Roe 389;
Darlene R. Corter, individually, Roe 390;
Billie Diaz, Trustee of the Hawk's View Trust dated January 7, 2016 (formerly known as Billie Early), Roe 391;
Benjamin Efram, Trustee of The Benjamin Efram Living Trust, Roe 392;
Edward W. Fredrick, individually, Roe 393;
Janet Fredrick, individually, Roe 394;
Paul F. Hofmeister, individually, Roe 395;
Orthopaedic Institute for Children Foundation, as successor to Los Angeles Orthopaedic Foundation, Roe 396;
Nut Farm LLC, a California limited liability company , Roe 397;
Arlene K. Lemos, individually, Roe 398;
Jeanne F. MacDonald, individually, Roe 399;
Diane Pacheco, Trustee of the Bypass and Survivor's Trust under the Pacheco Family Trust dated March 14, 2012, Roe 400;
Peter A. Reece, Trustee of the Pete and Charlene Reece Family Trust dated June 11, 1999 as amended and restated, Roe 401;
John E. Reece, individually, Roe 402;
Georgette Seefeldt, individually, Roe 403;
Blair Sellers, Trustee of the Blair E. Sellers and Marjorie B. Sellers Revocable Living

Cross-Defendants

Trust, Roe 404;
Marjorie Sellers, Trustee of the Blair E. Sellers and Marjorie B. Sellers Revocable Living Trust, Roe 405;
R.H. Smith Family Properties, LLC, as successor to R H Smith Family Partnership, Roe 406;
Sulphur Mountain Land and Livestock Co., LLC, a California limited liability company, Roe 407;
Anthony H. Taylor, individually, Roe 408;
Mark S. Taylor, individually, Roe 409;
F. Michael Shore, successor to Timber Canyon Ranches, Roe 410;
Union Pacific Railroad, as successor to Southern Pacific Transportation Company, Roe 411;
Volnav II LLC, a California limited liability company, Roe 412;
Leslie A. Wheelock, individually, Roe 413;
Amanda Colbeck, Roe 414;
Daniel Colbeck, Roe 415;
Lisa M. Crawford, Roe 416;
Todd C. Crawford, Roe 417

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Exhibit C – List of Parcels

Exhibit C

Parcels

008-0-090-115	009-0-121-035	010-0-080-100	010-0-110-035
008-0-090-175	009-0-122-010	010-0-080-130	010-0-110-070
008-0-090-195	009-0-122-075	010-0-080-180	010-0-110-080
008-0-090-295	009-0-122-085	010-0-080-210	010-0-110-090
008-0-120-075	009-0-130-155	010-0-080-220	010-0-110-100
008-0-120-100	009-0-130-315	010-0-080-240	010-0-110-120
008-0-120-140	009-0-130-395	010-0-080-250	010-0-110-130
008-0-120-175	009-0-130-405	010-0-080-275	010-0-120-020
009-0-050-050	009-0-130-415	010-0-080-305	010-0-120-155
009-0-060-065	010-0-010-010	010-0-080-315	010-0-120-180
009-0-060-070	010-0-010-050	010-0-080-320	010-0-120-200
009-0-060-080	010-0-010-060	010-0-080-330	010-0-120-210
009-0-070-020	010-0-050-010	010-0-080-340	010-0-120-220
009-0-070-040	010-0-050-050	010-0-080-350	010-0-120-230
009-0-070-050	010-0-050-071	010-0-080-380	010-0-120-240
009-0-070-090	010-0-050-072	010-0-090-010	010-0-130-040
009-0-070-100	010-0-050-150	010-0-090-030	010-0-130-090
009-0-070-110	010-0-050-220	010-0-090-040	010-0-130-100
009-0-070-150	010-0-050-230	010-0-090-060	010-0-130-130
009-0-070-160	010-0-050-240	010-0-090-070	010-0-130-150
009-0-070-185	010-0-050-260	010-0-090-080	010-0-130-170
009-0-070-190	010-0-050-280	010-0-090-110	010-0-130-190
009-0-070-200	010-0-050-290	010-0-101-020	010-0-130-210
009-0-080-010	010-0-050-310	010-0-101-030	010-0-130-220
009-0-080-020	010-0-050-320	010-0-101-040	010-0-130-230
009-0-090-020	010-0-060-030	010-0-101-050	010-0-130-240
009-0-090-070	010-0-060-060	010-0-101-060	010-0-130-250
009-0-090-090	010-0-060-070	010-0-101-070	010-0-130-265
009-0-090-110	010-0-060-080	010-0-101-080	010-0-130-275
009-0-090-120	010-0-060-090	010-0-101-090	010-0-130-285
009-0-090-130	010-0-060-110	010-0-101-100	010-0-130-320
009-0-090-140	010-0-060-120	010-0-101-130	010-0-130-350
009-0-090-150	010-0-060-140	010-0-101-140	010-0-140-035
009-0-090-165	010-0-060-150	010-0-101-150	010-0-140-055
009-0-090-175	010-0-070-010	010-0-102-080	010-0-140-065
009-0-090-180	010-0-070-050	010-0-102-090	010-0-140-075
009-0-090-190	010-0-070-070	010-0-102-170	010-0-140-080
009-0-110-295	010-0-070-110	010-0-102-190	010-0-140-115
009-0-110-345	010-0-070-120	010-0-102-200	010-0-140-125
009-0-110-355	010-0-070-130	010-0-102-210	010-0-140-130
009-0-110-385	010-0-070-140	010-0-102-270	010-0-140-150
009-0-110-395	010-0-070-160	010-0-102-280	010-0-140-165
009-0-110-405	010-0-070-210	010-0-102-290	010-0-140-170
009-0-120-015	010-0-070-255	010-0-102-320	010-0-140-180
009-0-121-010	010-0-070-260	010-0-102-330	010-0-140-235
009-0-121-025	010-0-080-040	010-0-102-340	010-0-140-245

Parcels

010-0-150-050	010-0-180-510	010-0-194-070	011-0-010-315
010-0-150-060	010-0-191-045	010-0-201-045	011-0-010-325
010-0-150-090	010-0-191-065	010-0-201-080	011-0-010-335
010-0-150-110	010-0-191-085	010-0-201-090	011-0-010-345
010-0-150-120	010-0-191-095	010-0-201-100	011-0-010-355
010-0-150-150	010-0-191-105	010-0-201-110	011-0-010-365
010-0-150-170	010-0-191-110	010-0-201-120	011-0-010-375
010-0-150-180	010-0-192-035	010-0-201-130	011-0-010-385
010-0-150-190	010-0-192-045	010-0-201-140	011-0-010-445
010-0-150-200	010-0-192-055	010-0-201-150	011-0-010-455
010-0-150-220	010-0-192-065	010-0-201-160	011-0-020-040
010-0-150-230	010-0-192-075	010-0-201-170	011-0-020-060
010-0-150-240	010-0-192-085	010-0-201-180	011-0-020-075
010-0-150-250	010-0-192-095	010-0-201-190	011-0-020-095
010-0-150-260	010-0-192-105	010-0-201-200	011-0-020-100
010-0-160-100	010-0-192-125	010-0-201-210	011-0-020-110
010-0-160-130	010-0-192-135	010-0-201-220	011-0-030-030
010-0-160-160	010-0-192-155	010-0-201-230	011-0-030-040
010-0-160-180	010-0-192-165	010-0-210-040	011-0-030-050
010-0-170-025	010-0-192-175	010-0-210-070	011-0-030-060
010-0-170-050	010-0-192-185	010-0-210-090	011-0-040-135
010-0-170-060	010-0-193-025	010-0-210-115	011-0-052-015
010-0-170-070	010-0-193-035	010-0-210-120	011-0-052-025
010-0-170-090	010-0-193-045	010-0-210-150	011-0-052-035
010-0-170-160	010-0-193-065	010-0-210-170	011-0-052-210
010-0-170-170	010-0-193-100	010-0-210-200	011-0-052-230
010-0-170-200	010-0-193-125	010-0-220-020	011-0-052-240
010-0-170-210	010-0-193-145	010-0-220-030	011-0-052-260
010-0-170-220	010-0-193-160	010-0-220-040	011-0-052-280
010-0-170-230	010-0-193-175	010-0-220-050	011-0-052-290
010-0-170-240	010-0-193-185	010-0-220-060	011-0-052-300
010-0-180-080	010-0-193-225	010-0-220-070	011-0-052-310
010-0-180-120	010-0-193-230	010-0-220-080	011-0-091-230
010-0-180-150	010-0-193-240	010-0-220-090	011-0-091-345
010-0-180-160	010-0-193-255	010-0-220-120	011-0-190-305
010-0-180-180	010-0-193-265	010-0-220-130	011-0-190-315
010-0-180-190	010-0-193-275	010-0-220-140	011-0-220-015
010-0-180-360	010-0-193-285	010-0-231-050	011-0-220-025
010-0-180-370	010-0-193-295	010-0-231-060	011-0-220-035
010-0-180-420	010-0-193-305	010-0-231-070	011-0-220-045
010-0-180-430	010-0-193-315	010-0-231-080	011-0-220-055
010-0-180-440	010-0-193-325	010-0-232-030	011-0-220-065
010-0-180-450	010-0-194-015	010-0-232-040	011-0-220-075
010-0-180-470	010-0-194-040	010-0-232-050	011-0-220-085
010-0-180-490	010-0-194-050	010-0-232-060	011-0-220-095
010-0-180-500	010-0-194-060	011-0-010-245	011-0-220-105

Parcels

011-0-220-115	011-0-240-105	011-0-250-355	014-0-040-070
011-0-220-125	011-0-240-115	011-0-250-365	014-0-040-140
011-0-220-135	011-0-240-125	011-0-250-375	014-0-040-170
011-0-220-145	011-0-240-135	011-0-250-385	014-0-040-200
011-0-220-155	011-0-240-145	011-0-260-055	014-0-040-210
011-0-220-165	011-0-240-155	011-0-260-065	014-0-040-220
011-0-220-175	011-0-240-165	011-0-260-075	014-0-040-230
011-0-220-185	011-0-240-175	011-0-260-085	014-0-040-240
011-0-220-195	011-0-240-185	011-0-270-010	014-0-040-270
011-0-220-205	011-0-240-205	011-0-270-030	014-0-040-280
011-0-220-215	011-0-240-215	011-0-270-040	014-0-050-010
011-0-220-225	011-0-240-225	011-0-270-055	014-0-050-025
011-0-220-235	011-0-240-235	011-0-270-065	014-0-050-060
011-0-220-245	011-0-240-245	011-0-270-075	014-0-050-080
011-0-220-255	011-0-240-255	011-0-270-085	014-0-050-100
011-0-220-265	011-0-240-265	011-0-270-095	014-0-050-130
011-0-220-275	011-0-240-275	011-0-270-105	014-0-050-145
011-0-220-285	011-0-240-285	011-0-270-115	014-0-050-150
011-0-220-295	011-0-250-015	011-0-270-130	014-0-050-160
011-0-230-015	011-0-250-025	011-0-270-140	014-0-050-175
011-0-230-025	011-0-250-035	011-0-270-150	014-0-060-055
011-0-230-035	011-0-250-045	011-0-270-160	014-0-060-100
011-0-230-045	011-0-250-055	011-0-270-170	014-0-060-160
011-0-230-055	011-0-250-065	011-0-270-180	014-0-060-175
011-0-230-065	011-0-250-075	014-0-010-020	014-0-060-185
011-0-230-075	011-0-250-085	014-0-010-080	014-0-060-245
011-0-230-105	011-0-250-095	014-0-010-090	014-0-060-255
011-0-230-115	011-0-250-105	014-0-100-025	014-0-060-365
011-0-230-155	011-0-250-115	014-0-100-035	014-0-060-415
011-0-230-165	011-0-250-125	014-0-120-060	014-0-060-425
011-0-230-175	011-0-250-135	014-0-130-050	014-0-060-435
011-0-230-195	011-0-250-145	014-0-030-050	014-0-060-440
011-0-230-205	011-0-250-155	014-0-030-060	014-0-060-455
011-0-230-215	011-0-250-165	014-0-030-100	014-0-060-465
011-0-230-225	011-0-250-175	014-0-030-140	014-0-060-480
011-0-230-235	011-0-250-185	014-0-030-160	014-0-060-490
011-0-230-255	011-0-250-195	014-0-030-185	014-0-060-500
011-0-240-015	011-0-250-205	014-0-030-205	014-0-070-020
011-0-240-025	011-0-250-215	014-0-030-220	014-0-070-030
011-0-240-035	011-0-250-225	014-0-030-250	014-0-070-040
011-0-240-045	011-0-250-235	014-0-030-275	014-0-070-090
011-0-240-055	011-0-250-245	014-0-030-285	014-0-070-160
011-0-240-065	011-0-250-255	014-0-030-290	014-0-070-170
011-0-240-075	011-0-250-260	014-0-030-300	014-0-070-180
011-0-240-085	011-0-250-295	014-0-040-045	014-0-070-190
011-0-240-095	011-0-250-305	014-0-040-055	014-0-070-200

Parcels

014-0-070-210	014-0-090-490	014-0-100-340	017-0-010-380
014-0-070-220	014-0-090-525	014-0-100-390	017-0-010-400
014-0-070-290	014-0-090-555	014-0-100-400	017-0-010-410
014-0-070-300	014-0-090-565	014-0-100-415	017-0-010-430
014-0-070-350	014-0-090-595	014-0-110-030	017-0-010-440
014-0-070-360	014-0-090-605	014-0-110-040	017-0-010-450
014-0-080-020	014-0-090-615	014-0-110-050	017-0-010-480
014-0-080-030	014-0-090-625	014-0-110-060	017-0-010-490
014-0-080-065	014-0-090-635	014-0-110-070	017-0-020-010
014-0-080-070	014-0-090-645	014-0-110-080	017-0-020-030
014-0-080-090	014-0-090-665	014-0-110-100	017-0-020-080
014-0-080-115	014-0-090-705	014-0-110-120	017-0-020-090
014-0-080-125	014-0-090-715	014-0-110-130	017-0-020-100
014-0-080-135	014-0-090-725	014-0-110-140	017-0-020-110
014-0-080-140	014-0-090-735	014-0-110-160	017-0-020-170
014-0-080-150	014-0-090-745	014-0-110-200	017-0-020-190
014-0-080-190	014-0-090-755	014-0-110-220	017-0-020-200
014-0-080-225	014-0-090-765	014-0-110-240	017-0-020-210
014-0-080-235	014-0-090-785	014-0-110-250	017-0-020-220
014-0-080-240	014-0-090-790	014-0-120-030	017-0-020-230
014-0-090-035	014-0-090-800	014-0-120-070	017-0-020-260
014-0-090-045	014-0-090-815	014-0-120-080	017-0-020-300
014-0-090-055	014-0-090-825	014-0-120-090	017-0-020-310
014-0-090-130	014-0-090-835	017-0-010-030	017-0-020-320
014-0-090-140	014-0-090-845	017-0-010-040	017-0-020-340
014-0-090-150	014-0-090-855	017-0-010-060	017-0-020-350
014-0-090-160	014-0-100-010	017-0-010-080	017-0-031-010
014-0-090-180	014-0-100-040	017-0-010-090	017-0-031-020
014-0-090-190	014-0-100-050	017-0-010-100	017-0-031-040
014-0-090-210	014-0-100-065	017-0-010-110	017-0-031-050
014-0-090-240	014-0-100-080	017-0-010-120	017-0-031-080
014-0-090-250	014-0-100-090	017-0-010-130	017-0-032-080
014-0-090-260	014-0-100-100	017-0-010-140	017-0-032-110
014-0-090-270	014-0-100-120	017-0-010-160	017-0-032-120
014-0-090-295	014-0-100-130	017-0-010-170	017-0-032-130
014-0-090-330	014-0-100-140	017-0-010-180	017-0-032-150
014-0-090-340	014-0-100-195	017-0-010-210	017-0-032-160
014-0-090-350	014-0-100-200	017-0-010-220	017-0-032-170
014-0-090-375	014-0-100-220	017-0-010-230	017-0-033-020
014-0-090-390	014-0-100-230	017-0-010-240	017-0-033-030
014-0-090-430	014-0-100-240	017-0-010-260	017-0-033-080
014-0-090-440	014-0-100-260	017-0-010-280	017-0-033-090
014-0-090-450	014-0-100-280	017-0-010-290	017-0-033-100
014-0-090-460	014-0-100-290	017-0-010-340	017-0-033-120
014-0-090-470	014-0-100-310	017-0-010-350	017-0-033-130
014-0-090-480	014-0-100-330	017-0-010-360	017-0-033-140

Parcels

017-0-033-150	017-0-051-520	017-0-061-400	017-0-062-380
017-0-033-160	017-0-051-530	017-0-061-410	017-0-062-390
017-0-033-170	017-0-051-540	017-0-061-420	017-0-062-400
017-0-033-180	017-0-052-020	017-0-061-430	017-0-062-410
017-0-040-010	017-0-052-050	017-0-061-440	017-0-062-420
017-0-040-030	017-0-052-060	017-0-061-450	017-0-062-430
017-0-040-060	017-0-052-070	017-0-061-460	017-0-062-440
017-0-040-070	017-0-052-080	017-0-061-470	017-0-062-450
017-0-040-110	017-0-052-090	017-0-061-480	017-0-071-020
017-0-040-120	017-0-052-100	017-0-061-490	017-0-071-070
017-0-040-130	017-0-052-130	017-0-061-500	017-0-071-080
017-0-040-150	017-0-052-140	017-0-061-510	017-0-071-090
017-0-040-160	017-0-052-150	017-0-061-520	017-0-071-100
017-0-051-010	017-0-052-170	017-0-061-530	017-0-071-120
017-0-051-020	017-0-052-190	017-0-061-540	017-0-071-130
017-0-051-030	017-0-052-220	017-0-061-550	017-0-071-140
017-0-051-040	017-0-052-230	017-0-061-560	017-0-071-150
017-0-051-075	017-0-052-240	017-0-062-010	017-0-071-180
017-0-051-085	017-0-052-250	017-0-062-020	017-0-071-190
017-0-051-100	017-0-052-260	017-0-062-030	017-0-071-200
017-0-051-110	017-0-052-270	017-0-062-040	017-0-071-220
017-0-051-120	017-0-052-280	017-0-062-050	017-0-071-240
017-0-051-130	017-0-052-290	017-0-062-060	017-0-071-250
017-0-051-140	017-0-061-010	017-0-062-070	017-0-071-260
017-0-051-150	017-0-061-030	017-0-062-100	017-0-071-270
017-0-051-160	017-0-061-040	017-0-062-110	017-0-071-280
017-0-051-170	017-0-061-070	017-0-062-120	017-0-071-290
017-0-051-210	017-0-061-080	017-0-062-150	017-0-071-310
017-0-051-230	017-0-061-140	017-0-062-160	017-0-071-320
017-0-051-240	017-0-061-170	017-0-062-190	017-0-071-330
017-0-051-250	017-0-061-180	017-0-062-200	017-0-071-340
017-0-051-265	017-0-061-190	017-0-062-210	017-0-071-350
017-0-051-270	017-0-061-210	017-0-062-220	017-0-071-360
017-0-051-290	017-0-061-220	017-0-062-230	017-0-071-370
017-0-051-300	017-0-061-230	017-0-062-240	017-0-071-380
017-0-051-340	017-0-061-240	017-0-062-250	017-0-071-400
017-0-051-350	017-0-061-270	017-0-062-260	017-0-071-410
017-0-051-360	017-0-061-290	017-0-062-280	017-0-071-420
017-0-051-380	017-0-061-300	017-0-062-290	017-0-072-020
017-0-051-450	017-0-061-310	017-0-062-300	017-0-072-030
017-0-051-460	017-0-061-330	017-0-062-310	017-0-072-040
017-0-051-470	017-0-061-340	017-0-062-330	017-0-072-060
017-0-051-480	017-0-061-350	017-0-062-340	017-0-072-070
017-0-051-490	017-0-061-360	017-0-062-350	017-0-072-080
017-0-051-500	017-0-061-380	017-0-062-360	017-0-072-090
017-0-051-510	017-0-061-390	017-0-062-370	017-0-072-100

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017-0-072-135	017-0-084-010	017-0-090-670	017-0-121-250
017-0-081-020	017-0-084-020	017-0-090-685	017-0-121-260
017-0-081-030	017-0-084-030	017-0-101-010	017-0-121-270
017-0-081-040	017-0-084-040	017-0-101-020	017-0-121-300
017-0-081-050	017-0-084-080	017-0-101-030	017-0-121-330
017-0-081-060	017-0-084-100	017-0-101-040	017-0-121-340
017-0-081-070	017-0-084-110	017-0-101-050	017-0-121-360
017-0-081-080	017-0-084-140	017-0-101-060	017-0-121-390
017-0-081-090	017-0-084-150	017-0-101-070	017-0-121-400
017-0-081-100	017-0-084-160	017-0-101-090	017-0-121-410
017-0-081-110	017-0-084-170	017-0-101-100	017-0-121-420
017-0-081-120	017-0-084-180	017-0-101-110	017-0-121-435
017-0-081-130	017-0-084-190	017-0-101-120	017-0-122-010
017-0-081-140	017-0-084-200	017-0-101-130	017-0-122-020
017-0-081-150	017-0-084-210	017-0-102-010	017-0-122-030
017-0-081-160	017-0-084-220	017-0-102-020	017-0-122-040
017-0-081-180	017-0-090-025	017-0-102-030	017-0-122-050
017-0-081-190	017-0-090-070	017-0-102-040	017-0-122-070
017-0-081-200	017-0-090-095	017-0-102-050	017-0-122-090
017-0-081-220	017-0-090-110	017-0-102-060	017-0-122-120
017-0-081-230	017-0-090-120	017-0-102-070	017-0-122-130
017-0-081-240	017-0-090-130	017-0-102-080	017-0-122-140
017-0-081-250	017-0-090-140	017-0-102-090	017-0-122-150
017-0-081-260	017-0-090-150	017-0-102-100	017-0-122-160
017-0-081-270	017-0-090-190	017-0-102-110	017-0-122-170
017-0-082-020	017-0-090-225	017-0-102-120	017-0-122-180
017-0-082-040	017-0-090-240	017-0-102-130	017-0-122-190
017-0-083-020	017-0-090-280	017-0-110-015	017-0-122-210
017-0-083-030	017-0-090-305	017-0-110-025	017-0-122-220
017-0-083-040	017-0-090-325	017-0-110-035	017-0-122-230
017-0-083-060	017-0-090-335	017-0-110-045	017-0-122-260
017-0-083-070	017-0-090-370	017-0-110-055	017-0-122-270
017-0-083-080	017-0-090-405	017-0-110-065	017-0-122-280
017-0-083-090	017-0-090-430	017-0-110-075	017-0-122-290
017-0-083-100	017-0-090-445	017-0-121-010	017-0-122-300
017-0-083-110	017-0-090-450	017-0-121-020	017-0-122-310
017-0-083-120	017-0-090-470	017-0-121-030	017-0-122-320
017-0-083-130	017-0-090-525	017-0-121-080	017-0-122-330
017-0-083-140	017-0-090-545	017-0-121-100	017-0-122-340
017-0-083-160	017-0-090-565	017-0-121-120	017-0-122-350
017-0-083-170	017-0-090-595	017-0-121-130	017-0-122-360
017-0-083-180	017-0-090-605	017-0-121-150	017-0-122-370
017-0-083-190	017-0-090-630	017-0-121-190	017-0-131-090
017-0-083-200	017-0-090-645	017-0-121-200	017-0-131-240

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017-0-131-250	017-0-133-160	017-0-141-210	017-0-144-040
017-0-131-260	017-0-133-180	017-0-141-220	017-0-144-050
017-0-131-270	017-0-133-190	017-0-141-230	017-0-144-060
017-0-131-290	017-0-133-200	017-0-141-240	017-0-144-070
017-0-131-300	017-0-133-210	017-0-141-250	017-0-144-080
017-0-131-310	017-0-133-220	017-0-142-010	017-0-144-090
017-0-131-320	017-0-133-230	017-0-142-025	017-0-144-110
017-0-131-330	017-0-133-240	017-0-142-080	017-0-144-120
017-0-131-340	017-0-134-010	017-0-142-090	017-0-144-140
017-0-131-350	017-0-134-030	017-0-142-110	017-0-144-150
017-0-131-360	017-0-134-040	017-0-142-120	017-0-144-160
017-0-131-370	017-0-134-060	017-0-142-130	017-0-144-180
017-0-131-380	017-0-134-080	017-0-142-140	017-0-144-210
017-0-131-390	017-0-134-090	017-0-142-150	017-0-144-220
017-0-131-420	017-0-134-110	017-0-142-160	017-0-144-230
017-0-131-430	017-0-134-120	017-0-142-170	017-0-144-240
017-0-131-450	017-0-134-130	017-0-142-190	017-0-144-250
017-0-131-460	017-0-134-140	017-0-142-220	017-0-151-010
017-0-131-470	017-0-134-150	017-0-142-230	017-0-151-020
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017-0-132-040	017-0-134-210	017-0-142-270	017-0-151-060
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017-0-132-090	017-0-134-240	017-0-142-300	017-0-151-090
017-0-132-100	017-0-134-250	017-0-143-010	017-0-151-100
017-0-132-120	017-0-134-260	017-0-143-020	017-0-151-110
017-0-132-130	017-0-134-270	017-0-143-030	017-0-151-120
017-0-132-140	017-0-134-280	017-0-143-040	017-0-151-130
017-0-132-150	017-0-141-010	017-0-143-050	017-0-151-140
017-0-132-160	017-0-141-020	017-0-143-060	017-0-151-150
017-0-132-180	017-0-141-030	017-0-143-070	017-0-151-160
017-0-132-190	017-0-141-040	017-0-143-080	017-0-151-180
017-0-132-200	017-0-141-050	017-0-143-100	017-0-151-190
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017-0-133-050	017-0-141-080	017-0-143-130	017-0-152-010
017-0-133-060	017-0-141-090	017-0-143-140	017-0-152-020
017-0-133-075	017-0-141-100	017-0-143-150	017-0-152-030
017-0-133-080	017-0-141-120	017-0-143-160	017-0-152-040
017-0-133-095	017-0-141-150	017-0-143-190	017-0-152-060
017-0-133-120	017-0-141-160	017-0-143-200	017-0-152-070
017-0-133-130	017-0-141-180	017-0-144-010	017-0-152-080
017-0-133-140	017-0-141-190	017-0-144-020	017-0-152-090
017-0-133-150	017-0-141-200	017-0-144-030	017-0-152-100

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017-0-152-110	017-0-154-210	017-0-180-595	017-0-194-080
017-0-152-120	017-0-154-220	017-0-180-600	017-0-194-090
017-0-152-130	017-0-154-230	017-0-180-610	017-0-195-010
017-0-152-140	017-0-154-250	017-0-180-620	017-0-195-020
017-0-152-160	017-0-160-060	017-0-191-010	017-0-195-030
017-0-152-180	017-0-160-125	017-0-191-040	017-0-195-040
017-0-152-190	017-0-160-150	017-0-191-060	017-0-195-055
017-0-152-200	017-0-160-165	017-0-191-070	017-0-195-070
017-0-152-210	017-0-160-175	017-0-191-100	017-0-195-080
017-0-152-220	017-0-170-030	017-0-191-110	017-0-195-100
017-0-152-260	017-0-170-070	017-0-191-120	017-0-195-120
017-0-153-240	017-0-170-100	017-0-191-130	017-0-195-130
017-0-153-250	017-0-170-110	017-0-192-010	017-0-195-140
017-0-153-260	017-0-170-135	017-0-192-020	017-0-195-150
017-0-153-270	017-0-170-140	017-0-192-030	017-0-195-160
017-0-153-290	017-0-170-165	017-0-192-040	017-0-195-170
017-0-153-320	017-0-170-175	017-0-192-050	017-0-196-010
017-0-153-330	017-0-180-010	017-0-192-060	017-0-196-020
017-0-153-355	017-0-180-020	017-0-192-080	017-0-196-050
017-0-153-380	017-0-180-050	017-0-192-090	017-0-196-060
017-0-153-390	017-0-180-070	017-0-192-100	017-0-196-070
017-0-153-400	017-0-180-150	017-0-192-110	017-0-196-090
017-0-153-410	017-0-180-170	017-0-192-130	017-0-196-100
017-0-153-420	017-0-180-205	017-0-192-140	017-0-196-110
017-0-153-430	017-0-180-210	017-0-192-150	017-0-196-120
017-0-153-440	017-0-180-230	017-0-192-160	017-0-196-130
017-0-153-450	017-0-180-240	017-0-192-170	017-0-201-010
017-0-153-460	017-0-180-250	017-0-193-010	017-0-201-020
017-0-153-470	017-0-180-305	017-0-193-020	017-0-201-030
017-0-153-500	017-0-180-310	017-0-193-030	017-0-201-040
017-0-153-510	017-0-180-320	017-0-193-040	017-0-201-050
017-0-154-010	017-0-180-360	017-0-193-050	017-0-201-060
017-0-154-020	017-0-180-390	017-0-193-060	017-0-202-020
017-0-154-030	017-0-180-440	017-0-193-070	017-0-202-030
017-0-154-040	017-0-180-460	017-0-193-080	017-0-202-040
017-0-154-050	017-0-180-470	017-0-193-090	017-0-202-050
017-0-154-060	017-0-180-480	017-0-193-100	017-0-202-060
017-0-154-080	017-0-180-490	017-0-193-110	017-0-202-070
017-0-154-100	017-0-180-500	017-0-193-120	017-0-202-080
017-0-154-130	017-0-180-510	017-0-193-130	017-0-202-090
017-0-154-140	017-0-180-520	017-0-193-140	017-0-202-100
017-0-154-150	017-0-180-530	017-0-194-020	017-0-202-110
017-0-154-160	017-0-180-540	017-0-194-030	017-0-202-120
017-0-154-170	017-0-180-560	017-0-194-050	017-0-202-130
017-0-154-190	017-0-180-575	017-0-194-060	017-0-203-010
017-0-154-200	017-0-180-585	017-0-194-070	017-0-203-020

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017-0-203-040	017-0-222-050	017-0-241-200	017-0-270-200
017-0-203-050	017-0-222-060	017-0-241-230	017-0-280-050
017-0-203-060	017-0-222-070	017-0-241-250	017-0-290-020
017-0-203-070	017-0-222-080	017-0-241-260	017-0-301-035
017-0-203-080	017-0-222-090	017-0-241-270	017-0-301-045
017-0-203-090	017-0-222-105	017-0-241-280	017-0-301-055
017-0-210-190	017-0-222-110	017-0-241-290	017-0-301-065
017-0-210-290	017-0-222-120	017-0-241-300	017-0-301-075
017-0-210-330	017-0-222-130	017-0-241-310	017-0-301-085
017-0-210-435	017-0-222-140	017-0-242-010	017-0-301-095
017-0-210-445	017-0-222-150	017-0-242-020	017-0-301-115
017-0-210-455	017-0-222-160	017-0-242-030	017-0-302-025
017-0-210-465	017-0-222-170	017-0-242-040	017-0-302-035
017-0-210-470	017-0-222-180	017-0-242-050	017-0-302-045
017-0-210-480	017-0-230-020	017-0-242-065	017-0-302-055
017-0-210-490	017-0-230-090	017-0-242-070	017-0-302-065
017-0-210-500	017-0-230-100	017-0-242-080	017-0-302-075
017-0-210-510	017-0-230-110	017-0-250-020	017-0-302-105
017-0-210-520	017-0-230-150	017-0-250-060	017-0-303-015
017-0-210-530	017-0-230-175	017-0-250-110	017-0-303-025
017-0-210-540	017-0-230-180	017-0-250-130	017-0-303-035
017-0-221-010	017-0-230-235	017-0-250-140	017-0-303-045
017-0-221-020	017-0-230-245	017-0-250-160	017-0-303-055
017-0-221-030	017-0-230-250	017-0-250-170	017-0-303-065
017-0-221-040	017-0-230-310	017-0-250-180	017-0-303-075
017-0-221-050	017-0-230-330	017-0-250-200	017-0-303-085
017-0-221-060	017-0-230-350	017-0-250-210	017-0-304-085
017-0-221-070	017-0-230-360	017-0-250-220	017-0-304-095
017-0-221-080	017-0-230-410	017-0-250-260	017-0-304-105
017-0-221-090	017-0-230-440	017-0-250-270	017-0-304-115
017-0-221-100	017-0-230-470	017-0-250-280	017-0-304-125
017-0-221-110	017-0-230-480	017-0-250-290	017-0-304-135
017-0-221-120	017-0-230-490	017-0-250-300	017-0-304-145
017-0-221-130	017-0-230-505	017-0-250-310	017-0-305-015
017-0-221-140	017-0-230-535	017-0-250-320	017-0-305-085
017-0-221-150	017-0-230-540	017-0-250-330	017-0-305-095
017-0-221-160	017-0-230-550	017-0-250-350	017-0-305-105
017-0-221-170	017-0-230-565	017-0-250-360	017-0-305-115
017-0-221-180	017-0-241-050	017-0-250-370	017-0-305-125
017-0-221-190	017-0-241-060	017-0-260-030	017-0-305-135
017-0-221-200	017-0-241-080	017-0-260-060	017-0-305-145
017-0-221-210	017-0-241-100	017-0-260-105	017-0-305-155
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017-0-222-020	017-0-241-150	017-0-260-130	017-0-311-025
017-0-222-030	017-0-241-180	017-0-270-080	017-0-311-035
017-0-222-040	017-0-241-190	017-0-270-130	017-0-311-045

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017-0-311-055	017-0-315-165	017-0-323-085	017-0-342-045
017-0-311-065	017-0-315-175	017-0-323-095	017-0-342-055
017-0-311-075	017-0-315-185	017-0-323-105	017-0-342-065
017-0-311-085	017-0-315-195	017-0-323-115	017-0-342-075
017-0-312-015	017-0-315-205	017-0-323-125	017-0-342-085
017-0-312-025	017-0-315-215	017-0-324-075	017-0-342-095
017-0-312-035	017-0-315-225	017-0-324-085	017-0-342-105
017-0-313-015	017-0-315-235	017-0-324-095	017-0-342-115
017-0-313-025	017-0-315-245	017-0-324-105	017-0-342-125
017-0-313-035	017-0-315-255	017-0-324-115	017-0-342-135
017-0-313-045	017-0-316-015	017-0-324-125	017-0-342-145
017-0-313-055	017-0-316-025	017-0-324-175	017-0-342-155
017-0-313-065	017-0-316-035	017-0-324-185	017-0-342-165
017-0-313-075	017-0-316-045	017-0-325-015	017-0-342-175
017-0-313-085	017-0-316-055	017-0-325-025	017-0-342-185
017-0-313-095	017-0-316-065	017-0-325-035	017-0-342-195
017-0-313-105	017-0-316-075	017-0-325-045	017-0-342-205
017-0-313-115	017-0-316-085	017-0-325-055	017-0-342-235
017-0-313-125	017-0-316-095	017-0-330-025	017-0-342-245
017-0-313-135	017-0-316-105	017-0-330-055	017-0-342-255
017-0-313-145	017-0-316-115	017-0-330-085	017-0-342-265
017-0-313-155	017-0-316-125	017-0-330-205	017-0-342-275
017-0-313-165	017-0-320-015	017-0-330-235	017-0-342-285
017-0-313-175	017-0-321-015	017-0-330-255	017-0-342-295
017-0-313-185	017-0-321-025	017-0-330-295	017-0-342-305
017-0-314-015	017-0-321-035	017-0-330-305	017-0-342-315
017-0-314-025	017-0-321-045	017-0-330-315	017-0-342-325
017-0-314-035	017-0-321-055	017-0-330-335	017-0-342-335
017-0-314-045	017-0-321-065	017-0-330-345	017-0-342-345
017-0-314-055	017-0-321-075	017-0-330-355	017-0-342-355
017-0-314-065	017-0-322-015	017-0-330-365	017-0-342-365
017-0-315-015	017-0-322-025	017-0-330-375	017-0-342-375
017-0-315-025	017-0-322-035	017-0-341-015	017-0-342-395
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017-0-315-055	017-0-322-065	017-0-341-045	017-0-343-035
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017-0-315-085	017-0-322-095	017-0-341-075	017-0-343-075
017-0-315-095	017-0-323-015	017-0-341-085	017-0-343-085
017-0-315-105	017-0-323-025	017-0-341-095	017-0-343-095
017-0-315-115	017-0-323-035	017-0-341-105	017-0-343-105
017-0-315-125	017-0-323-045	017-0-341-115	017-0-343-115
017-0-315-135	017-0-323-055	017-0-342-015	017-0-343-125
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017-0-315-155	017-0-323-075	017-0-342-035	017-0-343-145

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017-0-343-155	017-0-350-310	017-0-380-065	018-0-022-155
017-0-343-165	017-0-350-330	017-0-380-075	018-0-022-170
017-0-343-175	017-0-361-015	017-0-380-115	018-0-022-180
017-0-343-205	017-0-361-025	017-0-380-125	018-0-022-195
017-0-343-215	017-0-361-035	017-0-380-135	018-0-022-205
017-0-343-225	017-0-361-045	018-0-010-255	018-0-030-010
017-0-343-235	017-0-361-055	018-0-010-265	018-0-030-020
017-0-343-245	017-0-361-065	018-0-010-280	018-0-030-050
017-0-343-255	017-0-361-075	018-0-010-290	018-0-030-060
017-0-343-275	017-0-361-085	018-0-010-300	018-0-030-070
017-0-343-285	017-0-361-095	018-0-010-310	018-0-030-080
017-0-343-305	017-0-361-105	018-0-021-015	018-0-030-090
017-0-343-315	017-0-361-115	018-0-021-045	018-0-030-100
017-0-343-325	017-0-361-125	018-0-021-055	018-0-030-110
017-0-343-335	017-0-361-135	018-0-021-085	018-0-030-120
017-0-343-345	017-0-362-025	018-0-021-135	018-0-030-150
017-0-343-355	017-0-362-035	018-0-021-145	018-0-030-160
017-0-343-365	017-0-362-045	018-0-021-155	018-0-030-170
017-0-343-375	017-0-362-055	018-0-021-165	018-0-040-085
017-0-343-385	017-0-362-065	018-0-021-175	018-0-040-095
017-0-350-025	017-0-362-075	018-0-021-185	018-0-040-115
017-0-350-035	017-0-362-085	018-0-021-195	018-0-040-145
017-0-350-045	017-0-362-095	018-0-021-205	018-0-040-155
017-0-350-055	017-0-362-105	018-0-021-215	018-0-040-165
017-0-350-065	017-0-362-115	018-0-021-225	018-0-040-175
017-0-350-085	017-0-362-125	018-0-021-235	018-0-040-185
017-0-350-095	017-0-362-135	018-0-021-245	018-0-040-195
017-0-350-105	017-0-362-145	018-0-021-255	018-0-040-205
017-0-350-115	017-0-362-155	018-0-021-265	018-0-040-215
017-0-350-125	017-0-362-165	018-0-021-285	018-0-040-225
017-0-350-135	017-0-362-175	018-0-021-315	018-0-040-235
017-0-350-145	017-0-362-185	018-0-021-325	018-0-040-245
017-0-350-155	017-0-362-195	018-0-021-355	018-0-050-030
017-0-350-165	017-0-362-205	018-0-021-375	018-0-050-040
017-0-350-175	017-0-362-220	018-0-021-395	018-0-050-100
017-0-350-185	017-0-362-230	018-0-021-405	018-0-050-115
017-0-350-195	017-0-362-240	018-0-021-415	018-0-050-120
017-0-350-205	017-0-370-015	018-0-021-425	018-0-050-130
017-0-350-215	017-0-370-025	018-0-022-035	018-0-050-140
017-0-350-225	017-0-370-035	018-0-022-045	018-0-050-150
017-0-350-235	017-0-370-045	018-0-022-055	018-0-061-015
017-0-350-240	017-0-380-015	018-0-022-065	018-0-061-025
017-0-350-270	017-0-380-025	018-0-022-075	018-0-061-035
017-0-350-280	017-0-380-035	018-0-022-105	018-0-061-045
017-0-350-290	017-0-380-045	018-0-022-135	018-0-061-065
017-0-350-300	017-0-380-055	018-0-022-145	018-0-061-075

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018-0-061-085	018-0-071-250	018-0-090-240	018-0-102-135
018-0-061-105	018-0-071-260	018-0-090-250	018-0-102-145
018-0-061-115	018-0-071-270	018-0-090-270	018-0-102-155
018-0-061-135	018-0-071-280	018-0-090-300	018-0-102-165
018-0-061-145	018-0-071-290	018-0-090-310	018-0-102-195
018-0-061-155	018-0-072-010	018-0-090-330	018-0-102-215
018-0-061-165	018-0-072-020	018-0-090-340	018-0-102-235
018-0-061-175	018-0-072-070	018-0-090-350	018-0-102-245
018-0-061-195	018-0-072-090	018-0-090-360	018-0-102-255
018-0-061-205	018-0-072-130	018-0-090-390	018-0-102-315
018-0-061-215	018-0-072-140	018-0-090-400	018-0-102-325
018-0-061-225	018-0-072-180	018-0-090-410	018-0-102-335
018-0-061-235	018-0-072-190	018-0-090-420	018-0-102-345
018-0-061-255	018-0-072-200	018-0-090-430	018-0-102-355
018-0-061-265	018-0-072-210	018-0-101-015	018-0-102-365
018-0-061-285	018-0-072-220	018-0-101-025	018-0-102-375
018-0-061-295	018-0-072-240	018-0-101-035	018-0-102-385
018-0-061-305	018-0-072-250	018-0-101-045	018-0-102-395
018-0-061-315	018-0-080-015	018-0-101-055	018-0-102-405
018-0-061-325	018-0-080-020	018-0-101-085	018-0-111-030
018-0-061-335	018-0-080-030	018-0-101-095	018-0-111-040
018-0-061-405	018-0-080-040	018-0-101-105	018-0-111-050
018-0-061-425	018-0-080-050	018-0-101-115	018-0-111-070
018-0-062-035	018-0-080-060	018-0-101-125	018-0-111-080
018-0-062-045	018-0-080-070	018-0-101-155	018-0-111-105
018-0-062-065	018-0-080-080	018-0-101-165	018-0-111-110
018-0-062-085	018-0-080-090	018-0-101-175	018-0-111-130
018-0-062-105	018-0-080-100	018-0-101-185	018-0-111-140
018-0-062-115	018-0-080-110	018-0-101-195	018-0-111-160
018-0-062-145	018-0-080-130	018-0-101-205	018-0-111-170
018-0-062-155	018-0-080-150	018-0-101-215	018-0-111-195
018-0-062-205	018-0-080-170	018-0-101-225	018-0-111-210
018-0-062-215	018-0-080-200	018-0-101-235	018-0-111-220
018-0-062-225	018-0-080-220	018-0-101-245	018-0-111-235
018-0-062-235	018-0-080-230	018-0-101-255	018-0-111-245
018-0-062-245	018-0-090-010	018-0-101-265	018-0-111-255
018-0-062-255	018-0-090-020	018-0-101-275	018-0-111-275
018-0-062-265	018-0-090-075	018-0-101-285	018-0-112-040
018-0-071-040	018-0-090-090	018-0-101-295	018-0-112-080
018-0-071-120	018-0-090-100	018-0-101-305	018-0-112-090
018-0-071-130	018-0-090-140	018-0-101-315	018-0-112-100
018-0-071-160	018-0-090-150	018-0-101-325	018-0-112-120
018-0-071-200	018-0-090-160	018-0-101-335	018-0-112-160
018-0-071-210	018-0-090-170	018-0-101-345	018-0-112-170
018-0-071-230	018-0-090-200	018-0-101-355	018-0-112-185
018-0-071-240	018-0-090-220	018-0-102-125	018-0-112-200

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018-0-112-220	018-0-130-240	018-0-160-120	018-0-182-055
018-0-112-230	018-0-130-250	018-0-160-130	018-0-182-065
018-0-112-240	018-0-130-260	018-0-160-140	018-0-182-075
018-0-121-020	018-0-130-270	018-0-160-155	018-0-182-085
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018-0-121-190	018-0-140-275	018-0-170-040	018-0-182-155
018-0-121-200	018-0-140-280	018-0-170-060	018-0-182-165
018-0-121-220	018-0-140-290	018-0-170-070	018-0-182-175
018-0-121-230	018-0-140-300	018-0-170-090	018-0-182-185
018-0-121-240	018-0-140-310	018-0-170-100	018-0-182-195
018-0-121-250	018-0-140-320	018-0-170-160	018-0-182-205
018-0-121-270	018-0-140-330	018-0-170-170	018-0-182-215
018-0-121-280	018-0-140-355	018-0-170-180	018-0-182-225
018-0-121-290	018-0-140-365	018-0-170-210	018-0-182-235
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018-0-122-280	018-0-150-265	018-0-170-380	018-0-183-115
018-0-122-290	018-0-150-275	018-0-170-390	018-0-184-015
018-0-122-300	018-0-150-295	018-0-170-400	018-0-184-025
018-0-130-015	018-0-150-305	018-0-181-015	018-0-184-035
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018-0-130-185	018-0-160-070	018-0-182-025	018-0-184-115
018-0-130-205	018-0-160-085	018-0-182-035	018-0-184-125
018-0-130-235	018-0-160-110	018-0-182-045	018-0-184-135

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018-0-184-145	018-0-191-245	018-0-200-065	018-0-212-125
018-0-184-155	018-0-191-255	018-0-200-105	018-0-213-015
018-0-184-165	018-0-192-015	018-0-200-135	018-0-213-025
018-0-184-175	018-0-192-025	018-0-200-155	018-0-213-035
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018-0-184-225	018-0-192-075	018-0-200-225	018-0-213-085
018-0-184-235	018-0-192-085	018-0-200-235	018-0-213-095
018-0-184-245	018-0-192-095	018-0-200-245	018-0-213-105
018-0-184-255	018-0-192-105	018-0-200-255	018-0-213-115
018-0-184-265	018-0-192-115	018-0-200-290	018-0-214-015
018-0-184-275	018-0-192-125	018-0-200-340	018-0-214-025
018-0-184-285	018-0-192-135	018-0-200-355	018-0-214-035
018-0-185-015	018-0-192-145	018-0-200-365	018-0-214-045
018-0-185-025	018-0-192-155	018-0-211-015	018-0-214-055
018-0-185-035	018-0-192-165	018-0-211-025	018-0-214-065
018-0-185-045	018-0-192-175	018-0-211-035	018-0-221-015
018-0-185-055	018-0-192-185	018-0-211-045	018-0-221-025
018-0-185-065	018-0-192-195	018-0-211-055	018-0-221-035
018-0-185-075	018-0-193-015	018-0-211-065	018-0-221-045
018-0-185-085	018-0-193-025	018-0-211-075	018-0-221-055
018-0-191-015	018-0-193-035	018-0-211-085	018-0-221-065
018-0-191-025	018-0-193-045	018-0-211-095	018-0-221-075
018-0-191-035	018-0-193-055	018-0-211-105	018-0-221-085
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018-0-191-055	018-0-193-075	018-0-211-125	018-0-221-105
018-0-191-065	018-0-193-085	018-0-211-135	018-0-221-115
018-0-191-075	018-0-193-095	018-0-211-145	018-0-221-125
018-0-191-085	018-0-193-105	018-0-211-155	018-0-221-135
018-0-191-095	018-0-193-115	018-0-211-165	018-0-221-145
018-0-191-105	018-0-193-125	018-0-211-175	018-0-221-155
018-0-191-115	018-0-193-135	018-0-211-185	018-0-221-185
018-0-191-125	018-0-194-015	018-0-211-195	018-0-221-195
018-0-191-135	018-0-194-025	018-0-212-015	018-0-221-205
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018-0-191-155	018-0-194-045	018-0-212-035	018-0-221-225
018-0-191-165	018-0-194-055	018-0-212-045	018-0-221-235
018-0-191-175	018-0-194-065	018-0-212-055	018-0-221-245
018-0-191-185	018-0-194-075	018-0-212-065	018-0-221-255
018-0-191-195	018-0-194-085	018-0-212-075	018-0-221-265
018-0-191-205	018-0-194-095	018-0-212-085	018-0-221-275
018-0-191-215	018-0-200-015	018-0-212-095	018-0-221-285
018-0-191-225	018-0-200-045	018-0-212-105	018-0-221-295
018-0-191-235	018-0-200-055	018-0-212-115	018-0-221-305

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018-0-221-315	019-0-010-185	019-0-051-010	019-0-062-160
018-0-221-325	019-0-010-195	019-0-051-020	019-0-062-180
018-0-221-335	019-0-010-255	019-0-051-030	019-0-062-190
018-0-221-345	019-0-010-265	019-0-051-040	019-0-070-010
018-0-221-355	019-0-010-315	019-0-051-050	019-0-070-020
018-0-221-365	019-0-010-325	019-0-051-060	019-0-070-030
018-0-221-375	019-0-010-355	019-0-051-070	019-0-070-050
018-0-222-015	019-0-010-365	019-0-051-080	019-0-070-060
018-0-222-025	019-0-010-385	019-0-051-090	019-0-070-070
018-0-222-035	019-0-010-415	019-0-051-100	019-0-070-080
018-0-222-045	019-0-010-425	019-0-051-110	019-0-070-110
018-0-222-055	019-0-010-435	019-0-051-120	019-0-070-120
018-0-222-065	019-0-010-455	019-0-051-130	019-0-070-130
018-0-222-075	019-0-010-465	019-0-051-140	019-0-070-170
018-0-222-085	019-0-010-485	019-0-051-150	019-0-070-180
018-0-222-095	019-0-010-495	019-0-052-010	019-0-070-190
018-0-222-105	019-0-010-505	019-0-052-020	019-0-070-200
018-0-222-115	019-0-010-515	019-0-052-030	019-0-070-210
018-0-222-125	019-0-010-535	019-0-052-040	019-0-070-220
018-0-222-135	019-0-010-565	019-0-052-050	019-0-070-230
018-0-222-145	019-0-010-575	019-0-052-060	019-0-081-010
018-0-222-155	019-0-020-050	019-0-053-015	019-0-081-020
018-0-222-165	019-0-020-140	019-0-053-045	019-0-081-030
018-0-222-175	019-0-020-150	019-0-053-075	019-0-081-040
018-0-222-185	019-0-020-190	019-0-053-095	019-0-081-050
018-0-222-195	019-0-020-210	019-0-053-105	019-0-082-010
018-0-222-205	019-0-020-300	019-0-061-010	019-0-082-020
018-0-222-215	019-0-020-310	019-0-061-030	019-0-082-030
018-0-222-225	019-0-020-320	019-0-061-040	019-0-082-040
018-0-230-015	019-0-020-350	019-0-061-070	019-0-082-080
018-0-230-025	019-0-020-370	019-0-061-080	019-0-082-090
018-0-230-035	019-0-020-380	019-0-061-090	019-0-082-100
018-0-230-045	019-0-020-390	019-0-061-100	019-0-082-110
018-0-230-055	019-0-020-410	019-0-061-110	019-0-082-120
018-0-230-065	019-0-030-130	019-0-061-120	019-0-082-130
018-0-230-075	019-0-030-220	019-0-062-010	019-0-082-140
018-0-230-085	019-0-030-300	019-0-062-030	019-0-082-150
018-0-230-095	019-0-030-310	019-0-062-040	019-0-082-160
018-0-230-105	019-0-030-320	019-0-062-050	019-0-082-170
018-0-230-115	019-0-030-330	019-0-062-070	019-0-082-180
018-0-230-125	019-0-041-020	019-0-062-080	019-0-082-200
018-0-230-135	019-0-041-030	019-0-062-110	019-0-082-210
018-0-230-145	019-0-042-020	019-0-062-120	019-0-082-220
018-0-230-155	019-0-042-031	019-0-062-130	019-0-082-230
018-0-230-165	019-0-042-032	019-0-062-140	019-0-082-240
019-0-010-105	019-0-042-050	019-0-062-150	019-0-082-250

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019-0-082-270	019-0-100-210	019-0-160-105	019-0-190-150
019-0-082-280	019-0-100-225	019-0-160-115	019-0-190-160
019-0-091-010	019-0-100-240	019-0-160-125	019-0-190-170
019-0-091-020	019-0-100-260	019-0-160-135	019-0-190-180
019-0-091-030	019-0-100-270	019-0-160-145	019-0-190-190
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019-0-092-030	019-0-110-260	019-0-160-165	019-0-190-210
019-0-092-040	019-0-110-335	019-0-170-015	019-0-200-010
019-0-092-050	019-0-110-360	019-0-170-025	019-0-200-020
019-0-092-060	019-0-110-380	019-0-170-035	019-0-200-030
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019-0-092-080	019-0-110-420	019-0-170-055	019-0-200-050
019-0-092-090	019-0-110-470	019-0-170-065	019-0-200-060
019-0-092-110	019-0-110-485	019-0-170-075	019-0-200-070
019-0-092-120	019-0-140-015	019-0-170-085	019-0-200-080
019-0-092-140	019-0-140-025	019-0-170-095	019-0-200-090
019-0-092-150	019-0-140-035	019-0-170-105	019-0-200-100
019-0-092-160	019-0-140-045	019-0-170-115	019-0-200-110
019-0-092-170	019-0-140-055	019-0-170-125	019-0-200-120
019-0-092-180	019-0-140-065	019-0-170-135	019-0-200-130
019-0-092-190	019-0-140-075	019-0-170-145	019-0-200-140
019-0-092-200	019-0-140-085	019-0-170-155	019-0-200-150
019-0-092-210	019-0-140-095	019-0-170-165	019-0-200-160
019-0-092-220	019-0-140-105	019-0-170-175	019-0-200-170
019-0-092-230	019-0-140-115	019-0-180-010	019-0-200-180
019-0-092-240	019-0-140-125	019-0-180-020	019-0-200-190
019-0-093-010	019-0-150-015	019-0-180-030	019-0-200-200
019-0-093-030	019-0-150-025	019-0-180-040	019-0-200-210
019-0-093-040	019-0-150-035	019-0-180-050	019-0-200-220
019-0-093-050	019-0-150-045	019-0-180-060	019-0-200-230
019-0-093-060	019-0-150-055	019-0-180-070	019-0-200-240
019-0-094-010	019-0-150-065	019-0-180-080	019-0-200-250
019-0-094-020	019-0-150-075	019-0-190-010	019-0-200-260
019-0-094-030	019-0-150-085	019-0-190-020	019-0-210-010
019-0-094-040	019-0-150-095	019-0-190-030	019-0-210-020
019-0-094-050	019-0-150-105	019-0-190-040	019-0-210-030
019-0-094-060	019-0-150-115	019-0-190-050	019-0-210-040
019-0-094-070	019-0-160-015	019-0-190-060	019-0-210-050
019-0-094-080	019-0-160-025	019-0-190-070	019-0-210-060
019-0-094-090	019-0-160-035	019-0-190-080	019-0-210-070
019-0-094-100	019-0-160-045	019-0-190-090	019-0-210-080
019-0-094-110	019-0-160-055	019-0-190-100	019-0-210-090
019-0-094-120	019-0-160-065	019-0-190-110	019-0-210-100
019-0-100-160	019-0-160-075	019-0-190-120	019-0-210-110
019-0-100-190	019-0-160-085	019-0-190-130	019-0-210-120
019-0-100-200	019-0-160-095	019-0-190-140	019-0-210-130

Parcels

019-0-210-140	020-0-010-440	020-0-052-080	020-0-072-065
019-0-210-150	020-0-010-450	020-0-052-090	020-0-072-075
019-0-210-160	020-0-010-460	020-0-053-010	020-0-072-085
019-0-210-170	020-0-010-470	020-0-053-020	020-0-072-095
019-0-210-180	020-0-010-480	020-0-053-030	020-0-072-105
019-0-210-190	020-0-021-010	020-0-053-060	020-0-072-115
019-0-210-200	020-0-021-020	020-0-061-030	020-0-072-125
019-0-210-210	020-0-021-030	020-0-061-040	020-0-072-135
019-0-210-220	020-0-021-050	020-0-061-050	020-0-073-010
019-0-220-015	020-0-021-060	020-0-061-140	020-0-073-020
019-0-220-025	020-0-021-070	020-0-061-150	020-0-073-030
019-0-220-035	020-0-021-080	020-0-061-160	020-0-073-040
019-0-220-045	020-0-021-110	020-0-061-170	020-0-073-050
019-0-220-055	020-0-021-120	020-0-061-180	020-0-073-060
019-0-220-065	020-0-021-130	020-0-062-010	020-0-073-070
019-0-220-075	020-0-021-140	020-0-062-020	020-0-073-080
019-0-220-085	020-0-021-150	020-0-062-030	020-0-073-090
019-0-220-095	020-0-021-205	020-0-062-040	020-0-073-100
019-0-220-105	020-0-021-210	020-0-062-060	020-0-073-110
019-0-220-115	020-0-022-010	020-0-062-070	020-0-073-120
019-0-220-125	020-0-022-020	020-0-071-120	020-0-073-135
019-0-220-135	020-0-022-030	020-0-071-130	020-0-073-145
019-0-220-145	020-0-022-040	020-0-071-160	020-0-073-155
019-0-220-155	020-0-022-050	020-0-071-200	020-0-080-180
019-0-220-165	020-0-030-010	020-0-071-210	020-0-080-190
019-0-220-175	020-0-030-030	020-0-071-220	020-0-080-200
019-0-220-185	020-0-030-050	020-0-071-230	020-0-080-210
019-0-220-195	020-0-030-060	020-0-071-240	020-0-080-225
019-0-220-205	020-0-030-070	020-0-071-250	020-0-080-235
020-0-010-010	020-0-030-080	020-0-071-260	020-0-080-245
020-0-010-035	020-0-040-030	020-0-071-270	020-0-080-255
020-0-010-100	020-0-040-040	020-0-071-280	020-0-080-265
020-0-010-110	020-0-040-050	020-0-071-290	020-0-080-275
020-0-010-140	020-0-040-080	020-0-071-300	020-0-080-285
020-0-010-310	020-0-040-090	020-0-071-310	020-0-080-310
020-0-010-320	020-0-040-110	020-0-071-370	020-0-080-330
020-0-010-330	020-0-040-130	020-0-071-390	020-0-090-050
020-0-010-340	020-0-040-140	020-0-071-400	020-0-090-060
020-0-010-350	020-0-040-150	020-0-071-450	020-0-090-070
020-0-010-360	020-0-040-160	020-0-071-460	020-0-090-080
020-0-010-370	020-0-052-010	020-0-071-470	020-0-090-110
020-0-010-380	020-0-052-020	020-0-071-530	020-0-090-120
020-0-010-390	020-0-052-040	020-0-071-540	020-0-090-150
020-0-010-400	020-0-052-050	020-0-072-010	020-0-090-160
020-0-010-420	020-0-052-060	020-0-072-030	020-0-090-170
020-0-010-430	020-0-052-070	020-0-072-050	020-0-090-180

Parcels

020-0-090-190	020-0-142-090	020-0-201-130	020-0-213-100
020-0-090-200	020-0-142-100	020-0-201-140	020-0-214-010
020-0-100-030	020-0-142-110	020-0-201-150	020-0-214-020
020-0-100-050	020-0-160-010	020-0-201-160	020-0-214-030
020-0-100-060	020-0-170-010	020-0-201-170	020-0-221-010
020-0-100-070	020-0-170-020	020-0-201-190	020-0-221-030
020-0-100-080	020-0-170-050	020-0-201-200	020-0-221-040
020-0-100-090	020-0-181-010	020-0-202-010	020-0-221-050
020-0-110-030	020-0-181-020	020-0-202-030	020-0-221-060
020-0-110-040	020-0-181-030	020-0-202-040	020-0-221-070
020-0-110-050	020-0-181-040	020-0-202-050	020-0-221-080
020-0-110-070	020-0-181-050	020-0-202-060	020-0-222-020
020-0-110-080	020-0-181-070	020-0-202-070	020-0-230-015
020-0-110-090	020-0-181-080	020-0-202-080	020-0-230-025
020-0-110-100	020-0-181-090	020-0-202-090	020-0-230-035
020-0-110-110	020-0-181-110	020-0-202-100	020-0-230-045
020-0-110-120	020-0-181-120	020-0-202-110	020-0-230-055
020-0-130-010	020-0-181-160	020-0-202-120	020-0-230-065
020-0-130-020	020-0-182-040	020-0-202-130	020-0-230-075
020-0-130-050	020-0-191-010	020-0-202-140	020-0-230-085
020-0-130-060	020-0-191-020	020-0-202-150	020-0-230-095
020-0-130-070	020-0-191-030	020-0-202-160	020-0-240-015
020-0-130-080	020-0-191-040	020-0-203-010	020-0-240-025
020-0-130-090	020-0-192-010	020-0-203-020	020-0-240-035
020-0-130-100	020-0-192-020	020-0-203-030	020-0-240-045
020-0-130-110	020-0-192-030	020-0-203-040	020-0-240-055
020-0-130-140	020-0-192-040	020-0-203-050	020-0-240-065
020-0-130-150	020-0-192-060	020-0-203-060	020-0-250-015
020-0-130-160	020-0-192-070	020-0-203-070	020-0-250-025
020-0-141-010	020-0-192-080	020-0-203-080	020-0-250-035
020-0-141-020	020-0-192-090	020-0-203-090	020-0-250-045
020-0-141-030	020-0-192-100	020-0-203-100	020-0-250-055
020-0-141-040	020-0-192-120	020-0-211-010	020-0-250-065
020-0-141-050	020-0-192-130	020-0-211-025	020-0-250-075
020-0-141-060	020-0-192-140	020-0-212-010	020-0-250-085
020-0-141-070	020-0-192-150	020-0-212-020	020-0-250-095
020-0-141-080	020-0-192-160	020-0-212-030	020-0-250-105
020-0-141-090	020-0-201-010	020-0-213-010	021-0-011-020
020-0-141-100	020-0-201-030	020-0-213-020	021-0-011-090
020-0-142-010	020-0-201-040	020-0-213-030	021-0-011-100
020-0-142-020	020-0-201-050	020-0-213-040	021-0-011-110
020-0-142-040	020-0-201-060	020-0-213-050	021-0-011-120
020-0-142-050	020-0-201-070	020-0-213-060	021-0-011-130
020-0-142-060	020-0-201-090	020-0-213-070	021-0-011-140
020-0-142-070	020-0-201-100	020-0-213-080	021-0-011-150
020-0-142-080	020-0-201-120	020-0-213-090	021-0-011-160

Parcels

021-0-011-170	021-0-042-050	021-0-052-010	021-0-072-030
021-0-011-180	021-0-042-060	021-0-052-020	021-0-072-040
021-0-011-215	021-0-042-070	021-0-052-030	021-0-072-060
021-0-031-030	021-0-042-080	021-0-052-040	021-0-072-070
021-0-031-040	021-0-042-100	021-0-052-050	021-0-072-080
021-0-031-050	021-0-042-110	021-0-052-060	021-0-072-090
021-0-031-070	021-0-042-120	021-0-061-010	021-0-072-100
021-0-031-080	021-0-042-130	021-0-061-020	021-0-072-110
021-0-031-090	021-0-043-010	021-0-061-030	021-0-073-020
021-0-031-100	021-0-043-020	021-0-061-040	021-0-073-030
021-0-031-110	021-0-043-040	021-0-061-050	021-0-073-060
021-0-031-120	021-0-043-050	021-0-062-010	021-0-073-070
021-0-031-130	021-0-043-120	021-0-062-020	021-0-073-100
021-0-031-150	021-0-043-140	021-0-062-030	021-0-073-110
021-0-031-160	021-0-043-150	021-0-062-040	021-0-073-120
021-0-031-180	021-0-043-160	021-0-062-050	021-0-073-130
021-0-031-190	021-0-043-170	021-0-062-060	021-0-073-140
021-0-031-200	021-0-043-180	021-0-062-070	021-0-073-150
021-0-031-210	021-0-044-020	021-0-063-010	021-0-073-160
021-0-032-010	021-0-044-060	021-0-063-020	021-0-073-170
021-0-032-020	021-0-044-070	021-0-063-030	021-0-073-180
021-0-032-030	021-0-044-080	021-0-063-040	021-0-073-200
021-0-032-040	021-0-044-090	021-0-063-050	021-0-073-210
021-0-032-050	021-0-044-100	021-0-063-080	021-0-073-220
021-0-032-080	021-0-044-110	021-0-063-090	021-0-073-230
021-0-032-090	021-0-044-130	021-0-063-100	021-0-073-240
021-0-032-100	021-0-044-180	021-0-063-110	021-0-073-250
021-0-033-010	021-0-044-190	021-0-063-120	021-0-074-020
021-0-033-020	021-0-044-200	021-0-064-010	021-0-074-030
021-0-033-030	021-0-044-215	021-0-064-020	021-0-074-040
021-0-033-050	021-0-044-225	021-0-064-030	021-0-074-050
021-0-034-080	021-0-044-235	021-0-064-060	021-0-074-060
021-0-034-090	021-0-051-040	021-0-064-070	021-0-074-070
021-0-034-100	021-0-051-050	021-0-064-080	021-0-074-090
021-0-034-110	021-0-051-080	021-0-071-010	021-0-074-100
021-0-034-170	021-0-051-090	021-0-071-020	021-0-074-110
021-0-034-190	021-0-051-100	021-0-071-030	021-0-074-120
021-0-034-210	021-0-051-170	021-0-071-040	021-0-074-130
021-0-034-220	021-0-051-190	021-0-071-060	021-0-074-140
021-0-034-230	021-0-051-200	021-0-071-070	021-0-074-150
021-0-041-020	021-0-051-235	021-0-071-090	021-0-074-160
021-0-041-030	021-0-051-240	021-0-071-100	021-0-074-170
021-0-041-040	021-0-051-250	021-0-071-110	021-0-074-180
021-0-041-055	021-0-051-270	021-0-071-120	021-0-074-190
021-0-042-010	021-0-051-280	021-0-072-010	021-0-081-040
021-0-042-030	021-0-051-290	021-0-072-020	021-0-081-050

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021-0-081-070	021-0-092-040	021-0-105-120	021-0-131-040
021-0-081-080	021-0-092-050	021-0-106-010	021-0-131-110
021-0-081-120	021-0-092-060	021-0-106-020	021-0-131-120
021-0-081-130	021-0-092-070	021-0-106-030	021-0-131-160
021-0-081-140	021-0-092-080	021-0-106-040	021-0-131-170
021-0-081-150	021-0-092-090	021-0-106-080	021-0-131-230
021-0-081-170	021-0-092-100	021-0-106-095	021-0-131-240
021-0-081-180	021-0-092-110	021-0-106-100	021-0-131-250
021-0-081-210	021-0-092-120	021-0-111-010	021-0-140-010
021-0-081-220	021-0-101-010	021-0-111-030	021-0-140-020
021-0-081-230	021-0-101-020	021-0-111-040	021-0-140-130
021-0-081-240	021-0-101-050	021-0-111-050	021-0-140-140
021-0-081-250	021-0-101-080	021-0-111-060	021-0-140-150
021-0-081-335	021-0-101-090	021-0-111-070	021-0-140-160
021-0-081-345	021-0-101-100	021-0-111-080	021-0-140-170
021-0-081-355	021-0-101-110	021-0-111-100	021-0-140-180
021-0-081-365	021-0-101-120	021-0-111-110	021-0-140-190
021-0-081-375	021-0-101-130	021-0-111-120	021-0-140-205
021-0-081-385	021-0-102-010	021-0-112-020	021-0-140-210
021-0-081-395	021-0-102-040	021-0-113-040	021-0-140-220
021-0-081-405	021-0-102-060	021-0-113-050	021-0-140-230
021-0-081-430	021-0-102-070	021-0-113-060	021-0-140-240
021-0-082-010	021-0-102-090	021-0-113-070	021-0-140-250
021-0-082-020	021-0-102-100	021-0-113-080	021-0-140-260
021-0-082-030	021-0-102-110	021-0-113-090	021-0-140-330
021-0-082-060	021-0-103-010	021-0-113-100	021-0-140-340
021-0-082-070	021-0-103-020	021-0-113-110	021-0-140-360
021-0-082-080	021-0-103-030	021-0-113-120	021-0-140-370
021-0-082-090	021-0-103-040	021-0-113-130	021-0-140-380
021-0-082-100	021-0-104-010	021-0-113-150	021-0-140-400
021-0-082-110	021-0-104-020	021-0-113-180	021-0-140-410
021-0-082-120	021-0-104-030	021-0-113-200	021-0-140-420
021-0-082-130	021-0-104-040	021-0-113-230	021-0-140-430
021-0-082-140	021-0-104-050	021-0-113-250	021-0-140-440
021-0-082-150	021-0-104-060	021-0-113-260	021-0-140-450
021-0-082-160	021-0-104-070	021-0-113-270	021-0-140-460
021-0-082-170	021-0-104-080	021-0-113-280	021-0-140-480
021-0-091-010	021-0-104-090	021-0-113-290	021-0-140-490
021-0-091-020	021-0-105-010	021-0-113-300	021-0-140-500
021-0-091-030	021-0-105-040	021-0-113-310	021-0-140-510
021-0-091-040	021-0-105-060	021-0-113-320	021-0-150-015
021-0-091-050	021-0-105-070	021-0-113-330	021-0-150-025
021-0-091-060	021-0-105-080	021-0-120-010	021-0-150-035
021-0-092-010	021-0-105-090	021-0-131-010	021-0-160-015
021-0-092-020	021-0-105-100	021-0-131-020	021-0-160-025
021-0-092-030	021-0-105-110	021-0-131-030	021-0-160-035

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021-0-160-045	022-0-013-070	022-0-025-190	022-0-030-635
022-0-012-010	022-0-013-080	022-0-025-200	022-0-030-645
022-0-012-020	022-0-013-090	022-0-030-030	022-0-030-655
022-0-012-030	022-0-013-105	022-0-030-070	022-0-030-665
022-0-012-040	022-0-013-110	022-0-030-080	022-0-030-675
022-0-012-050	022-0-013-120	022-0-030-090	022-0-040-020
022-0-012-210	022-0-013-130	022-0-030-100	022-0-040-030
022-0-012-230	022-0-013-140	022-0-030-110	022-0-040-060
022-0-012-240	022-0-013-150	022-0-030-120	022-0-040-070
022-0-012-250	022-0-013-160	022-0-030-130	022-0-040-080
022-0-012-260	022-0-021-020	022-0-030-140	022-0-040-100
022-0-012-270	022-0-021-030	022-0-030-150	022-0-040-110
022-0-012-280	022-0-021-040	022-0-030-180	022-0-040-120
022-0-012-290	022-0-021-050	022-0-030-190	022-0-040-130
022-0-012-300	022-0-021-060	022-0-030-210	022-0-040-150
022-0-012-310	022-0-021-070	022-0-030-220	022-0-040-170
022-0-012-320	022-0-021-080	022-0-030-230	022-0-040-190
022-0-012-330	022-0-021-090	022-0-030-240	022-0-040-200
022-0-012-340	022-0-022-040	022-0-030-250	022-0-040-210
022-0-012-350	022-0-022-060	022-0-030-260	022-0-040-220
022-0-012-360	022-0-022-070	022-0-030-300	022-0-040-230
022-0-012-370	022-0-022-080	022-0-030-330	022-0-040-240
022-0-012-380	022-0-022-090	022-0-030-340	022-0-040-250
022-0-012-390	022-0-022-100	022-0-030-350	022-0-040-260
022-0-012-430	022-0-022-110	022-0-030-360	022-0-040-270
022-0-012-440	022-0-023-020	022-0-030-370	022-0-051-030
022-0-012-450	022-0-023-050	022-0-030-380	022-0-051-040
022-0-012-460	022-0-024-020	022-0-030-390	022-0-051-050
022-0-012-490	022-0-024-030	022-0-030-400	022-0-051-080
022-0-012-515	022-0-024-050	022-0-030-410	022-0-051-090
022-0-012-525	022-0-024-080	022-0-030-460	022-0-051-100
022-0-012-535	022-0-024-090	022-0-030-480	022-0-051-110
022-0-012-545	022-0-024-110	022-0-030-490	022-0-051-120
022-0-012-555	022-0-024-120	022-0-030-500	022-0-051-130
022-0-012-565	022-0-024-130	022-0-030-510	022-0-051-140
022-0-012-575	022-0-024-140	022-0-030-520	022-0-051-150
022-0-012-615	022-0-025-010	022-0-030-535	022-0-051-180
022-0-012-625	022-0-025-020	022-0-030-545	022-0-051-190
022-0-012-640	022-0-025-040	022-0-030-555	022-0-051-220
022-0-012-665	022-0-025-050	022-0-030-565	022-0-051-230
022-0-013-015	022-0-025-060	022-0-030-575	022-0-051-250
022-0-013-025	022-0-025-100	022-0-030-585	022-0-051-260
022-0-013-035	022-0-025-110	022-0-030-595	022-0-051-270
022-0-013-045	022-0-025-120	022-0-030-605	022-0-051-280
022-0-013-055	022-0-025-150	022-0-030-615	022-0-051-290
022-0-013-060	022-0-025-180	022-0-030-625	022-0-052-010

Parcels

022-0-052-020	022-0-062-205	022-0-081-020	022-0-082-140
022-0-052-030	022-0-063-015	022-0-081-030	022-0-082-150
022-0-052-050	022-0-063-025	022-0-081-040	022-0-083-020
022-0-052-060	022-0-063-035	022-0-081-050	022-0-083-030
022-0-052-070	022-0-063-045	022-0-081-060	022-0-083-040
022-0-052-080	022-0-063-055	022-0-081-070	022-0-083-050
022-0-052-090	022-0-063-065	022-0-081-080	022-0-083-060
022-0-052-100	022-0-063-075	022-0-081-090	022-0-083-070
022-0-052-110	022-0-063-085	022-0-081-100	022-0-083-080
022-0-052-120	022-0-063-095	022-0-081-110	022-0-083-090
022-0-061-025	022-0-063-105	022-0-081-120	022-0-083-100
022-0-061-035	022-0-063-115	022-0-081-130	022-0-083-110
022-0-061-045	022-0-063-125	022-0-081-140	022-0-083-120
022-0-061-055	022-0-063-135	022-0-081-150	022-0-083-130
022-0-061-065	022-0-063-145	022-0-081-160	022-0-083-140
022-0-061-075	022-0-064-015	022-0-081-230	022-0-084-010
022-0-061-085	022-0-064-025	022-0-081-240	022-0-084-020
022-0-061-095	022-0-065-015	022-0-081-250	022-0-084-030
022-0-061-105	022-0-065-025	022-0-081-260	022-0-084-040
022-0-061-115	022-0-065-035	022-0-081-270	022-0-084-070
022-0-061-125	022-0-065-045	022-0-081-280	022-0-084-080
022-0-061-135	022-0-066-015	022-0-081-290	022-0-084-090
022-0-061-145	022-0-066-025	022-0-081-300	022-0-084-100
022-0-061-155	022-0-071-010	022-0-081-310	022-0-084-110
022-0-061-165	022-0-071-020	022-0-081-320	022-0-084-130
022-0-061-170	022-0-071-030	022-0-081-330	022-0-090-010
022-0-061-180	022-0-071-040	022-0-081-340	022-0-090-040
022-0-062-015	022-0-071-050	022-0-081-350	022-0-090-070
022-0-062-025	022-0-071-060	022-0-081-360	022-0-090-080
022-0-062-035	022-0-071-070	022-0-081-370	022-0-090-100
022-0-062-045	022-0-071-080	022-0-081-380	022-0-090-110
022-0-062-055	022-0-071-090	022-0-081-390	022-0-090-120
022-0-062-065	022-0-071-100	022-0-081-400	022-0-090-140
022-0-062-075	022-0-071-110	022-0-082-010	022-0-090-150
022-0-062-085	022-0-072-010	022-0-082-020	022-0-090-160
022-0-062-095	022-0-072-020	022-0-082-030	022-0-090-180
022-0-062-105	022-0-072-030	022-0-082-040	022-0-090-190
022-0-062-115	022-0-072-040	022-0-082-050	022-0-090-200
022-0-062-125	022-0-072-050	022-0-082-060	022-0-090-210
022-0-062-135	022-0-072-060	022-0-082-070	022-0-090-220
022-0-062-145	022-0-072-070	022-0-082-080	022-0-090-230
022-0-062-155	022-0-072-080	022-0-082-090	022-0-090-250
022-0-062-165	022-0-072-090	022-0-082-100	022-0-090-260
022-0-062-175	022-0-072-100	022-0-082-110	022-0-090-270
022-0-062-185	022-0-072-110	022-0-082-120	022-0-090-280
022-0-062-195	022-0-081-010	022-0-082-130	022-0-090-290

Parcels

022-0-090-300	022-0-110-020	022-0-120-095	022-0-130-165
022-0-090-400	022-0-110-040	022-0-120-105	022-0-130-175
022-0-090-410	022-0-110-060	022-0-120-115	022-0-130-185
022-0-090-420	022-0-110-070	022-0-120-125	022-0-130-195
022-0-090-450	022-0-110-090	022-0-120-135	022-0-130-205
022-0-090-480	022-0-110-100	022-0-120-145	022-0-130-215
022-0-090-490	022-0-110-130	022-0-120-155	022-0-130-225
022-0-090-500	022-0-110-150	022-0-120-165	022-0-130-235
022-0-090-510	022-0-110-160	022-0-120-175	022-0-130-240
022-0-090-520	022-0-110-190	022-0-120-185	022-0-140-030
022-0-100-020	022-0-110-200	022-0-120-195	022-0-140-040
022-0-100-030	022-0-110-210	022-0-120-205	022-0-140-050
022-0-100-080	022-0-110-220	022-0-120-215	022-0-140-060
022-0-100-090	022-0-110-230	022-0-120-225	022-0-140-080
022-0-100-100	022-0-110-240	022-0-120-235	022-0-140-090
022-0-100-110	022-0-110-250	022-0-120-245	022-0-140-100
022-0-100-130	022-0-110-260	022-0-120-255	022-0-140-110
022-0-100-150	022-0-110-300	022-0-120-265	022-0-140-120
022-0-100-160	022-0-110-320	022-0-120-275	022-0-140-130
022-0-100-170	022-0-110-330	022-0-120-285	022-0-140-140
022-0-100-180	022-0-110-340	022-0-120-290	022-0-140-150
022-0-100-190	022-0-110-350	022-0-120-300	022-0-140-160
022-0-100-200	022-0-110-380	022-0-120-330	022-0-140-170
022-0-100-230	022-0-110-390	022-0-120-340	022-0-140-180
022-0-100-240	022-0-110-400	022-0-120-350	022-0-140-190
022-0-100-250	022-0-110-410	022-0-120-360	022-0-140-200
022-0-100-260	022-0-110-430	022-0-120-370	022-0-140-210
022-0-100-270	022-0-110-440	022-0-120-380	022-0-140-220
022-0-100-280	022-0-110-460	022-0-120-390	022-0-140-230
022-0-100-290	022-0-110-470	022-0-120-400	022-0-140-260
022-0-100-300	022-0-110-480	022-0-120-410	022-0-140-270
022-0-100-310	022-0-110-490	022-0-130-015	022-0-140-290
022-0-100-320	022-0-110-500	022-0-130-025	022-0-140-300
022-0-100-330	022-0-110-520	022-0-130-035	022-0-140-310
022-0-100-340	022-0-110-530	022-0-130-045	022-0-140-320
022-0-100-350	022-0-110-540	022-0-130-055	022-0-140-330
022-0-100-360	022-0-110-550	022-0-130-065	022-0-140-340
022-0-100-380	022-0-110-560	022-0-130-075	022-0-140-350
022-0-100-390	022-0-110-570	022-0-130-085	022-0-140-365
022-0-100-420	022-0-120-010	022-0-130-095	022-0-140-370
022-0-100-430	022-0-120-020	022-0-130-105	022-0-140-380
022-0-100-440	022-0-120-040	022-0-130-115	022-0-140-390
022-0-100-450	022-0-120-050	022-0-130-125	022-0-140-400
022-0-100-460	022-0-120-065	022-0-130-135	022-0-140-410
022-0-100-470	022-0-120-075	022-0-130-145	022-0-140-460
022-0-110-010	022-0-120-085	022-0-130-155	022-0-140-470

Parcels

022-0-140-490	022-0-151-270	022-0-161-025	022-0-162-065
022-0-140-500	022-0-151-280	022-0-161-035	022-0-162-075
022-0-140-510	022-0-151-290	022-0-161-040	022-0-162-085
022-0-140-520	022-0-151-300	022-0-161-060	022-0-162-095
022-0-140-530	022-0-151-310	022-0-161-070	022-0-162-105
022-0-140-540	022-0-151-320	022-0-161-080	022-0-162-120
022-0-140-550	022-0-151-330	022-0-161-090	022-0-162-145
022-0-140-560	022-0-151-340	022-0-161-100	022-0-171-015
022-0-140-570	022-0-151-350	022-0-161-110	022-0-171-025
022-0-140-580	022-0-151-360	022-0-161-120	022-0-171-035
022-0-140-590	022-0-151-370	022-0-161-130	022-0-171-045
022-0-140-600	022-0-152-010	022-0-161-140	022-0-171-055
022-0-140-610	022-0-152-020	022-0-161-150	022-0-171-065
022-0-140-630	022-0-152-030	022-0-161-160	022-0-171-075
022-0-140-640	022-0-152-040	022-0-161-170	022-0-171-085
022-0-140-650	022-0-152-050	022-0-161-180	022-0-172-015
022-0-140-660	022-0-152-070	022-0-161-195	022-0-172-025
022-0-140-670	022-0-152-080	022-0-161-205	022-0-172-035
022-0-140-680	022-0-152-090	022-0-161-215	022-0-172-045
022-0-140-690	022-0-152-100	022-0-161-225	022-0-172-055
022-0-151-010	022-0-152-110	022-0-161-235	022-0-172-065
022-0-151-020	022-0-152-120	022-0-161-240	022-0-172-075
022-0-151-030	022-0-152-130	022-0-161-250	022-0-172-085
022-0-151-040	022-0-152-140	022-0-161-270	022-0-172-095
022-0-151-050	022-0-152-150	022-0-161-280	022-0-172-105
022-0-151-060	022-0-152-160	022-0-161-290	022-0-172-115
022-0-151-070	022-0-152-170	022-0-161-300	022-0-172-125
022-0-151-080	022-0-152-180	022-0-161-310	022-0-172-135
022-0-151-090	022-0-152-190	022-0-161-320	022-0-172-145
022-0-151-100	022-0-152-200	022-0-161-330	022-0-172-155
022-0-151-110	022-0-152-210	022-0-161-340	022-0-172-165
022-0-151-120	022-0-152-220	022-0-161-350	022-0-173-015
022-0-151-130	022-0-152-230	022-0-161-360	022-0-173-025
022-0-151-140	022-0-152-240	022-0-161-370	022-0-173-035
022-0-151-150	022-0-152-250	022-0-161-380	022-0-173-045
022-0-151-160	022-0-152-280	022-0-161-390	022-0-173-055
022-0-151-170	022-0-152-290	022-0-161-405	022-0-173-065
022-0-151-180	022-0-152-300	022-0-161-415	022-0-173-075
022-0-151-190	022-0-152-310	022-0-161-420	022-0-173-085
022-0-151-200	022-0-152-320	022-0-161-430	022-0-181-015
022-0-151-210	022-0-152-330	022-0-161-440	022-0-181-025
022-0-151-220	022-0-152-340	022-0-161-450	022-0-181-035
022-0-151-230	022-0-152-350	022-0-162-015	022-0-181-045
022-0-151-240	022-0-152-360	022-0-162-035	022-0-181-055
022-0-151-250	022-0-152-370	022-0-162-045	022-0-181-065
022-0-151-260	022-0-161-015	022-0-162-055	022-0-181-075

Parcels

022-0-181-085	022-0-191-055	022-0-193-045	022-0-200-115
022-0-181-095	022-0-192-015	022-0-193-055	022-0-200-125
022-0-181-105	022-0-192-025	022-0-193-060	022-0-200-135
022-0-181-115	022-0-192-035	022-0-193-075	022-0-200-145
022-0-182-015	022-0-192-045	022-0-193-080	022-0-200-155
022-0-182-025	022-0-192-055	022-0-193-095	022-0-200-165
022-0-182-035	022-0-192-065	022-0-193-105	022-0-200-175
022-0-182-045	022-0-192-075	022-0-194-015	022-0-200-185
022-0-182-055	022-0-192-085	022-0-194-025	022-0-200-195
022-0-182-065	022-0-192-095	022-0-194-035	022-0-200-205
022-0-182-075	022-0-192-105	022-0-194-045	022-0-200-215
022-0-182-085	022-0-192-115	022-0-194-055	022-0-200-225
022-0-182-095	022-0-192-125	022-0-194-065	022-0-200-235
022-0-182-105	022-0-192-135	022-0-194-075	022-0-200-245
022-0-182-115	022-0-192-145	022-0-194-080	022-0-200-255
022-0-182-125	022-0-192-150	022-0-194-095	022-0-200-265
022-0-182-135	022-0-192-160	022-0-194-105	022-0-200-275
022-0-182-145	022-0-192-170	022-0-194-110	022-0-200-285
022-0-183-015	022-0-192-180	022-0-194-120	022-0-200-295
022-0-183-025	022-0-192-190	022-0-194-130	022-0-200-305
022-0-183-035	022-0-192-205	022-0-194-145	022-0-200-315
022-0-183-045	022-0-192-215	022-0-194-155	022-0-200-325
022-0-183-055	022-0-192-225	022-0-194-165	022-0-200-335
022-0-183-065	022-0-192-230	022-0-195-010	022-0-200-345
022-0-183-075	022-0-192-245	022-0-195-020	022-0-200-355
022-0-183-085	022-0-192-255	022-0-195-030	022-0-200-365
022-0-183-095	022-0-192-265	022-0-195-045	022-0-200-375
022-0-183-100	022-0-192-275	022-0-195-055	022-0-200-385
022-0-183-110	022-0-192-285	022-0-196-015	022-0-200-395
022-0-183-120	022-0-192-295	022-0-196-020	022-0-200-405
022-0-184-010	022-0-192-305	022-0-196-030	022-0-200-415
022-0-184-020	022-0-192-315	022-0-196-040	022-0-200-425
022-0-184-030	022-0-192-325	022-0-196-050	022-0-200-435
022-0-184-040	022-0-192-335	022-0-196-060	022-0-200-445
022-0-184-050	022-0-192-345	022-0-196-070	022-0-200-455
022-0-184-060	022-0-192-355	022-0-196-080	022-0-200-465
022-0-184-070	022-0-192-365	022-0-196-090	022-0-200-475
022-0-184-080	022-0-192-375	022-0-200-010	022-0-200-485
022-0-184-090	022-0-192-385	022-0-200-035	022-0-200-495
022-0-185-010	022-0-192-395	022-0-200-045	022-0-200-505
022-0-185-020	022-0-192-405	022-0-200-055	022-0-200-525
022-0-185-030	022-0-192-415	022-0-200-065	022-0-200-535
022-0-191-015	022-0-192-425	022-0-200-075	022-0-210-010
022-0-191-025	022-0-193-015	022-0-200-085	022-0-210-020
022-0-191-035	022-0-193-025	022-0-200-095	022-0-210-090
022-0-191-045	022-0-193-035	022-0-200-105	022-0-210-120

Parcels

022-0-210-140	023-0-040-060	023-0-062-240	023-0-075-195
022-0-210-170	023-0-040-080	023-0-062-250	023-0-075-205
022-0-210-180	023-0-040-090	023-0-062-270	023-0-075-210
022-0-210-190	023-0-050-010	023-0-063-060	023-0-075-220
022-0-210-200	023-0-050-020	023-0-063-070	023-0-076-020
022-0-210-210	023-0-050-030	023-0-063-080	023-0-077-020
022-0-210-220	023-0-050-080	023-0-063-140	023-0-077-040
022-0-210-230	023-0-050-120	023-0-063-170	023-0-077-050
022-0-210-245	023-0-050-130	023-0-063-190	023-0-077-060
023-0-010-010	023-0-061-040	023-0-063-200	023-0-077-070
023-0-010-040	023-0-061-050	023-0-063-210	023-0-077-080
023-0-010-080	023-0-061-080	023-0-063-220	023-0-077-090
023-0-010-090	023-0-061-090	023-0-063-230	023-0-081-010
023-0-010-100	023-0-061-100	023-0-063-240	023-0-081-020
023-0-010-110	023-0-061-110	023-0-070-010	023-0-081-030
023-0-010-120	023-0-061-120	023-0-070-030	023-0-081-040
023-0-010-130	023-0-061-130	023-0-071-010	023-0-081-050
023-0-020-010	023-0-061-140	023-0-071-030	023-0-081-060
023-0-020-020	023-0-061-150	023-0-071-040	023-0-081-070
023-0-020-030	023-0-061-160	023-0-071-050	023-0-081-080
023-0-020-040	023-0-061-170	023-0-072-010	023-0-081-090
023-0-020-050	023-0-061-210	023-0-072-020	023-0-081-100
023-0-020-060	023-0-061-220	023-0-072-030	023-0-081-110
023-0-020-070	023-0-061-230	023-0-072-040	023-0-081-120
023-0-020-080	023-0-061-250	023-0-072-050	023-0-081-130
023-0-020-100	023-0-061-260	023-0-072-060	023-0-081-145
023-0-020-130	023-0-061-270	023-0-072-070	023-0-081-150
023-0-020-150	023-0-061-280	023-0-073-010	023-0-081-160
023-0-020-160	023-0-062-010	023-0-073-020	023-0-081-300
023-0-020-170	023-0-062-020	023-0-073-030	023-0-081-315
023-0-020-180	023-0-062-030	023-0-073-050	023-0-081-325
023-0-020-200	023-0-062-040	023-0-073-060	023-0-081-335
023-0-020-210	023-0-062-050	023-0-073-070	023-0-081-345
023-0-030-020	023-0-062-060	023-0-073-080	023-0-081-355
023-0-030-030	023-0-062-070	023-0-073-090	023-0-081-365
023-0-030-040	023-0-062-080	023-0-073-100	023-0-081-370
023-0-030-050	023-0-062-090	023-0-073-110	023-0-081-400
023-0-030-060	023-0-062-100	023-0-074-010	023-0-081-410
023-0-030-130	023-0-062-110	023-0-074-020	023-0-081-420
023-0-030-140	023-0-062-120	023-0-074-030	023-0-081-430
023-0-030-150	023-0-062-130	023-0-074-050	023-0-081-440
023-0-030-180	023-0-062-140	023-0-074-060	023-0-081-450
023-0-030-190	023-0-062-150	023-0-074-070	023-0-081-460
023-0-040-020	023-0-062-160	023-0-075-050	023-0-082-010
023-0-040-030	023-0-062-170	023-0-075-170	023-0-082-020
023-0-040-040	023-0-062-230	023-0-075-185	023-0-082-030

Parcels

023-0-082-040	023-0-100-100	023-0-110-450	023-0-141-170
023-0-082-050	023-0-100-140	023-0-110-460	023-0-141-200
023-0-082-070	023-0-100-150	023-0-110-470	023-0-141-210
023-0-082-090	023-0-100-160	023-0-120-010	023-0-141-220
023-0-082-105	023-0-100-170	023-0-120-020	023-0-141-230
023-0-082-115	023-0-100-180	023-0-120-040	023-0-141-240
023-0-082-120	023-0-100-190	023-0-120-060	023-0-141-250
023-0-082-130	023-0-100-200	023-0-120-070	023-0-141-260
023-0-083-010	023-0-100-210	023-0-120-080	023-0-141-270
023-0-083-020	023-0-100-220	023-0-120-090	023-0-141-280
023-0-083-030	023-0-100-230	023-0-120-105	023-0-141-310
023-0-083-040	023-0-100-240	023-0-120-110	023-0-141-330
023-0-083-050	023-0-100-250	023-0-120-120	023-0-141-340
023-0-083-060	023-0-100-285	023-0-120-170	023-0-141-360
023-0-083-070	023-0-110-010	023-0-120-180	023-0-141-380
023-0-083-080	023-0-110-040	023-0-120-190	023-0-141-410
023-0-083-090	023-0-110-080	023-0-120-200	023-0-141-420
023-0-083-100	023-0-110-110	023-0-120-210	023-0-141-430
023-0-083-110	023-0-110-120	023-0-120-220	023-0-142-010
023-0-083-120	023-0-110-130	023-0-120-230	023-0-142-020
023-0-083-130	023-0-110-150	023-0-130-010	023-0-142-030
023-0-083-140	023-0-110-160	023-0-130-020	023-0-142-040
023-0-083-150	023-0-110-170	023-0-131-010	023-0-142-050
023-0-090-010	023-0-110-180	023-0-131-025	023-0-142-060
023-0-090-020	023-0-110-190	023-0-132-050	023-0-142-070
023-0-090-030	023-0-110-200	023-0-132-070	023-0-142-080
023-0-090-040	023-0-110-210	023-0-132-090	023-0-142-090
023-0-090-060	023-0-110-220	023-0-132-110	023-0-142-100
023-0-090-080	023-0-110-230	023-0-132-120	023-0-142-150
023-0-090-120	023-0-110-240	023-0-132-160	023-0-142-170
023-0-090-140	023-0-110-250	023-0-132-170	023-0-150-030
023-0-090-150	023-0-110-260	023-0-132-180	023-0-150-040
023-0-090-235	023-0-110-270	023-0-141-010	023-0-150-050
023-0-090-295	023-0-110-280	023-0-141-020	023-0-150-060
023-0-090-305	023-0-110-290	023-0-141-030	023-0-150-070
023-0-090-310	023-0-110-310	023-0-141-040	023-0-150-085
023-0-090-320	023-0-110-320	023-0-141-050	023-0-150-175
023-0-090-330	023-0-110-330	023-0-141-060	023-0-150-205
023-0-090-345	023-0-110-340	023-0-141-070	023-0-150-250
023-0-090-355	023-0-110-360	023-0-141-080	023-0-150-285
023-0-100-020	023-0-110-370	023-0-141-090	023-0-150-295
023-0-100-040	023-0-110-390	023-0-141-100	023-0-150-315
023-0-100-050	023-0-110-400	023-0-141-110	023-0-150-345
023-0-100-060	023-0-110-410	023-0-141-120	023-0-150-405
023-0-100-080	023-0-110-420	023-0-141-130	023-0-150-415
023-0-100-090	023-0-110-440	023-0-141-140	023-0-150-425

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023-0-150-435	023-0-200-025	023-0-210-215	024-0-072-305
023-0-150-445	023-0-200-035	023-0-210-225	024-0-072-335
023-0-150-455	023-0-200-045	023-0-210-235	024-0-072-345
023-0-150-475	023-0-200-055	024-0-010-010	024-0-072-365
023-0-150-480	023-0-200-065	024-0-010-020	024-0-072-385
023-0-150-490	023-0-200-075	024-0-010-030	024-0-072-395
023-0-150-500	023-0-200-085	024-0-010-050	024-0-072-445
023-0-150-510	023-0-200-095	024-0-010-090	024-0-072-455
023-0-160-025	023-0-200-105	024-0-010-100	024-0-072-465
023-0-160-075	023-0-200-115	024-0-010-110	024-0-072-475
023-0-160-085	023-0-200-125	024-0-010-120	024-0-072-485
023-0-160-095	023-0-200-135	024-0-020-010	024-0-072-505
023-0-160-105	023-0-200-145	024-0-020-090	024-0-072-525
023-0-160-115	023-0-200-155	024-0-020-100	024-0-072-535
023-0-160-125	023-0-200-165	024-0-031-130	024-0-072-545
023-0-160-195	023-0-200-175	024-0-031-160	024-0-072-555
023-0-160-205	023-0-200-185	024-0-032-020	024-0-072-565
023-0-160-255	023-0-200-195	024-0-033-020	024-0-072-605
023-0-160-285	023-0-200-205	024-0-033-040	024-0-072-615
023-0-160-305	023-0-200-215	024-0-033-070	024-0-072-625
023-0-160-315	023-0-200-225	024-0-033-080	024-0-072-685
023-0-160-335	023-0-200-235	024-0-033-100	024-0-072-695
023-0-160-345	023-0-200-245	024-0-033-130	024-0-072-705
023-0-160-355	023-0-200-250	024-0-033-170	024-0-072-715
023-0-160-365	023-0-200-260	024-0-033-180	024-0-080-100
023-0-171-060	023-0-200-290	024-0-033-230	024-0-080-135
023-0-172-015	023-0-210-015	024-0-033-240	024-0-080-145
023-0-172-030	023-0-210-025	024-0-041-030	024-0-080-150
023-0-172-055	023-0-210-035	024-0-041-050	024-0-080-160
023-0-172-065	023-0-210-045	024-0-041-060	024-0-090-055
023-0-173-010	023-0-210-055	024-0-042-015	024-0-090-115
023-0-173-020	023-0-210-065	024-0-042-020	024-0-090-125
023-0-173-030	023-0-210-075	024-0-050-070	024-0-090-145
023-0-180-010	023-0-210-085	024-0-050-080	024-0-090-175
023-0-180-020	023-0-210-095	024-0-071-025	024-0-090-210
023-0-180-030	023-0-210-105	024-0-071-085	024-0-090-220
023-0-180-040	023-0-210-115	024-0-071-095	024-0-090-285
023-0-180-050	023-0-210-125	024-0-071-105	024-0-090-295
023-0-180-060	023-0-210-135	024-0-072-015	024-0-090-305
023-0-180-070	023-0-210-145	024-0-072-025	024-0-090-315
023-0-180-080	023-0-210-155	024-0-072-035	024-0-090-325
023-0-180-090	023-0-210-165	024-0-072-055	024-0-090-345
023-0-190-080	023-0-210-175	024-0-072-085	024-0-090-355
023-0-190-110	023-0-210-185	024-0-072-155	024-0-090-365
023-0-190-120	023-0-210-195	024-0-072-245	024-0-090-375
023-0-200-015	023-0-210-205	024-0-072-265	024-0-090-380

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024-0-090-390	024-0-103-080	024-0-112-190	024-0-133-055
024-0-090-415	024-0-103-090	024-0-112-200	024-0-133-065
024-0-090-425	024-0-103-100	024-0-112-210	024-0-133-075
024-0-090-435	024-0-103-110	024-0-112-240	024-0-134-015
024-0-101-010	024-0-103-140	024-0-112-250	024-0-140-025
024-0-101-020	024-0-103-150	024-0-112-260	024-0-140-035
024-0-101-030	024-0-103-160	024-0-112-300	024-0-141-015
024-0-101-080	024-0-103-170	024-0-112-310	024-0-141-025
024-0-101-090	024-0-103-180	024-0-112-320	024-0-141-035
024-0-101-100	024-0-103-190	024-0-112-330	024-0-141-045
024-0-101-110	024-0-103-200	024-0-112-340	024-0-141-055
024-0-101-120	024-0-103-210	024-0-112-350	024-0-141-065
024-0-101-130	024-0-103-220	024-0-112-400	024-0-141-070
024-0-101-140	024-0-103-230	024-0-112-410	024-0-142-015
024-0-101-150	024-0-111-010	024-0-120-025	024-0-142-025
024-0-101-160	024-0-111-020	024-0-120-035	024-0-142-035
024-0-101-170	024-0-111-030	024-0-120-045	024-0-142-045
024-0-101-180	024-0-111-040	024-0-120-055	024-0-142-055
024-0-101-190	024-0-111-060	024-0-120-095	024-0-142-065
024-0-101-200	024-0-111-070	024-0-120-105	024-0-142-075
024-0-101-210	024-0-111-080	024-0-120-145	024-0-142-085
024-0-101-220	024-0-111-090	024-0-120-155	024-0-142-110
024-0-101-230	024-0-111-100	024-0-120-165	024-0-143-015
024-0-102-010	024-0-111-110	024-0-120-175	024-0-143-025
024-0-102-020	024-0-111-120	024-0-120-225	024-0-143-035
024-0-102-070	024-0-111-130	024-0-120-235	024-0-143-045
024-0-102-080	024-0-111-140	024-0-120-265	024-0-144-010
024-0-102-090	024-0-111-160	024-0-120-285	024-0-151-015
024-0-102-100	024-0-111-170	024-0-120-295	024-0-151-025
024-0-102-110	024-0-111-180	024-0-131-015	024-0-151-035
024-0-102-120	024-0-111-190	024-0-131-025	024-0-151-045
024-0-102-140	024-0-111-200	024-0-131-035	024-0-151-055
024-0-102-150	024-0-111-210	024-0-131-045	024-0-151-065
024-0-102-160	024-0-111-220	024-0-131-055	024-0-151-075
024-0-102-170	024-0-111-230	024-0-131-065	024-0-151-085
024-0-102-180	024-0-111-240	024-0-132-015	024-0-151-095
024-0-102-190	024-0-112-010	024-0-132-025	024-0-151-105
024-0-102-200	024-0-112-030	024-0-132-035	024-0-151-115
024-0-102-210	024-0-112-040	024-0-132-045	024-0-160-015
024-0-102-230	024-0-112-050	024-0-132-055	024-0-160-025
024-0-102-240	024-0-112-060	024-0-132-065	024-0-160-035
024-0-102-250	024-0-112-100	024-0-132-075	024-0-160-045
024-0-102-280	024-0-112-110	024-0-133-015	024-0-160-055
024-0-102-290	024-0-112-120	024-0-133-025	024-0-160-065
024-0-103-060	024-0-112-160	024-0-133-035	024-0-160-075
024-0-103-070	024-0-112-170	024-0-133-045	024-0-160-085

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028-0-010-020	028-0-072-130	028-0-092-070	028-0-130-085
028-0-010-040	028-0-072-170	028-0-092-080	028-0-140-015
028-0-010-050	028-0-072-180	028-0-100-060	028-0-140-025
028-0-010-070	028-0-072-190	028-0-100-080	028-0-140-035
028-0-010-080	028-0-072-200	028-0-100-090	028-0-140-040
028-0-010-090	028-0-072-220	028-0-100-100	028-0-140-050
028-0-010-120	028-0-072-230	028-0-100-110	028-0-151-035
028-0-020-030	028-0-072-240	028-0-100-120	028-0-151-045
028-0-020-040	028-0-072-250	028-0-100-130	028-0-151-055
028-0-020-070	028-0-072-260	028-0-100-140	028-0-151-065
028-0-030-020	028-0-072-270	028-0-100-160	028-0-152-125
028-0-030-060	028-0-072-290	028-0-111-010	028-0-152-135
028-0-030-110	028-0-072-300	028-0-111-020	028-0-152-145
028-0-030-135	028-0-072-310	028-0-111-030	028-0-152-155
028-0-040-010	028-0-072-340	028-0-111-040	028-0-152-165
028-0-040-020	028-0-072-350	028-0-111-050	028-0-152-175
028-0-040-030	028-0-072-360	028-0-111-060	028-0-152-185
028-0-040-040	028-0-072-370	028-0-112-025	028-0-152-195
028-0-040-055	028-0-072-390	028-0-112-030	028-0-152-205
028-0-040-100	028-0-072-400	028-0-112-050	028-0-152-215
028-0-040-110	028-0-072-410	028-0-112-065	028-0-152-225
028-0-040-130	028-0-072-420	028-0-112-080	028-0-152-235
028-0-040-140	028-0-072-430	028-0-112-100	028-0-152-245
028-0-040-150	028-0-072-440	028-0-112-110	028-0-152-255
028-0-050-010	028-0-072-450	028-0-112-120	028-0-152-265
028-0-050-030	028-0-072-460	028-0-112-130	028-0-152-275
028-0-050-040	028-0-073-010	028-0-120-010	028-0-152-285
028-0-050-050	028-0-073-040	028-0-120-025	028-0-152-295
028-0-050-060	028-0-073-050	028-0-120-030	028-0-152-305
028-0-060-030	028-0-080-020	028-0-120-040	028-0-152-315
028-0-060-040	028-0-080-030	028-0-120-060	028-0-152-325
028-0-060-050	028-0-080-040	028-0-120-105	028-0-152-335
028-0-060-080	028-0-080-050	028-0-120-115	028-0-153-185
028-0-060-090	028-0-080-060	028-0-120-130	028-0-153-195
028-0-060-100	028-0-080-070	028-0-120-170	028-0-153-205
028-0-071-010	028-0-080-100	028-0-120-180	028-0-153-215
028-0-072-030	028-0-080-110	028-0-120-215	028-0-153-225
028-0-072-040	028-0-080-120	028-0-120-225	028-0-153-235
028-0-072-050	028-0-080-130	028-0-120-230	028-0-153-245
028-0-072-060	028-0-091-020	028-0-120-240	028-0-153-255
028-0-072-070	028-0-091-040	028-0-120-255	028-0-153-265
028-0-072-080	028-0-091-050	028-0-120-265	028-0-153-275
028-0-072-090	028-0-091-090	028-0-130-010	028-0-153-285
028-0-072-100	028-0-091-100	028-0-130-045	028-0-153-295
028-0-072-110	028-0-092-040	028-0-130-065	028-0-153-305
028-0-072-120	028-0-092-060	028-0-130-075	028-0-153-315

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028-0-153-325	028-0-161-035	028-0-171-160	028-0-181-095
028-0-153-335	028-0-161-045	028-0-171-170	028-0-181-105
028-0-153-345	028-0-161-055	028-0-171-180	028-0-181-115
028-0-153-355	028-0-161-065	028-0-171-190	028-0-181-125
028-0-153-365	028-0-161-075	028-0-171-200	028-0-181-135
028-0-153-375	028-0-161-085	028-0-171-210	028-0-182-015
028-0-153-385	028-0-161-095	028-0-171-220	028-0-182-025
028-0-153-395	028-0-161-105	028-0-171-230	028-0-182-035
028-0-153-405	028-0-161-115	028-0-171-240	028-0-182-045
028-0-153-415	028-0-161-125	028-0-171-250	028-0-182-055
028-0-153-425	028-0-161-135	028-0-171-260	028-0-182-065
028-0-153-435	028-0-161-145	028-0-171-270	029-0-010-025
028-0-153-445	028-0-161-155	028-0-171-280	029-0-010-090
028-0-153-455	028-0-161-165	028-0-172-010	029-0-010-120
028-0-153-465	028-0-161-175	028-0-172-020	029-0-010-145
028-0-153-475	028-0-161-185	028-0-172-030	029-0-010-155
028-0-153-485	028-0-162-015	028-0-172-040	029-0-010-165
028-0-153-495	028-0-162-025	028-0-172-050	029-0-010-175
028-0-153-505	028-0-162-035	028-0-172-060	029-0-010-185
028-0-153-515	028-0-162-045	028-0-172-070	029-0-010-205
028-0-154-095	028-0-162-055	028-0-172-080	029-0-010-215
028-0-154-105	028-0-162-065	028-0-172-090	029-0-010-225
028-0-154-115	028-0-162-075	028-0-172-100	029-0-010-235
028-0-154-125	028-0-162-085	028-0-172-110	029-0-010-245
028-0-154-135	028-0-162-095	028-0-172-120	029-0-010-260
028-0-154-145	028-0-162-105	028-0-172-130	029-0-010-285
028-0-154-155	028-0-162-115	028-0-172-140	029-0-010-310
028-0-154-165	028-0-162-125	028-0-172-150	029-0-010-335
028-0-154-175	028-0-162-135	028-0-172-160	029-0-010-355
028-0-154-185	028-0-162-145	028-0-173-010	029-0-010-370
028-0-154-195	028-0-162-155	028-0-173-020	029-0-010-385
028-0-154-205	028-0-171-010	028-0-173-030	029-0-010-405
028-0-154-215	028-0-171-020	028-0-173-040	029-0-010-420
028-0-154-225	028-0-171-030	028-0-173-050	029-0-010-450
028-0-154-235	028-0-171-040	028-0-173-060	029-0-010-485
028-0-154-245	028-0-171-050	028-0-173-070	029-0-010-490
028-0-155-055	028-0-171-060	028-0-173-080	029-0-010-500
028-0-155-065	028-0-171-070	028-0-173-090	029-0-010-520
028-0-155-075	028-0-171-080	028-0-173-100	029-0-010-530
028-0-155-085	028-0-171-090	028-0-173-110	029-0-010-545
028-0-155-095	028-0-171-100	028-0-173-120	029-0-010-580
028-0-155-105	028-0-171-110	028-0-173-130	029-0-010-590
028-0-155-115	028-0-171-120	028-0-173-140	029-0-010-600
028-0-155-125	028-0-171-130	028-0-181-065	029-0-010-610
028-0-161-015	028-0-171-140	028-0-181-075	029-0-010-620
028-0-161-025	028-0-171-150	028-0-181-085	029-0-010-635

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029-0-010-645	029-0-032-195	029-0-070-200	029-0-100-450
029-0-010-675	029-0-032-200	029-0-070-210	029-0-100-465
029-0-010-685	029-0-033-190	029-0-070-230	029-0-100-475
029-0-010-690	029-0-033-210	029-0-070-250	029-0-100-485
029-0-010-700	029-0-033-230	029-0-070-260	029-0-100-495
029-0-010-715	029-0-033-240	029-0-070-280	029-0-100-505
029-0-010-725	029-0-033-250	029-0-070-290	029-0-100-510
029-0-010-735	029-0-033-260	029-0-070-300	029-0-100-520
029-0-010-745	029-0-033-270	029-0-070-310	029-0-100-540
029-0-010-795	029-0-033-280	029-0-070-350	029-0-100-550
029-0-010-800	029-0-050-050	029-0-070-360	029-0-100-560
029-0-010-810	029-0-050-060	029-0-081-015	029-0-100-570
029-0-010-820	029-0-050-080	029-0-081-020	029-0-100-580
029-0-010-835	029-0-050-090	029-0-081-030	029-0-100-590
029-0-010-845	029-0-050-100	029-0-081-040	029-0-100-600
029-0-020-040	029-0-050-110	029-0-081-065	029-0-110-010
029-0-020-050	029-0-060-020	029-0-081-095	029-0-110-030
029-0-020-060	029-0-060-030	029-0-081-105	029-0-110-050
029-0-020-070	029-0-060-040	029-0-081-115	029-0-110-060
029-0-020-080	029-0-060-050	029-0-082-025	029-0-110-080
029-0-020-210	029-0-060-060	029-0-090-010	029-0-110-090
029-0-020-230	029-0-060-070	029-0-090-020	029-0-110-100
029-0-020-240	029-0-060-080	029-0-090-070	029-0-110-110
029-0-020-260	029-0-060-120	029-0-090-090	029-0-110-120
029-0-020-280	029-0-060-190	029-0-090-100	029-0-110-200
029-0-020-290	029-0-060-200	029-0-090-120	029-0-110-250
029-0-020-310	029-0-060-230	029-0-090-135	029-0-110-280
029-0-020-320	029-0-060-240	029-0-090-145	029-0-110-300
029-0-020-330	029-0-060-250	029-0-090-150	029-0-110-350
029-0-020-340	029-0-060-260	029-0-100-010	029-0-110-370
029-0-020-350	029-0-060-270	029-0-100-020	029-0-110-380
029-0-020-360	029-0-060-280	029-0-100-050	029-0-110-390
029-0-031-030	029-0-060-290	029-0-100-060	029-0-110-400
029-0-031-040	029-0-070-020	029-0-100-100	029-0-110-440
029-0-031-050	029-0-070-030	029-0-100-130	029-0-110-450
029-0-031-095	029-0-070-040	029-0-100-140	029-0-110-460
029-0-031-100	029-0-070-050	029-0-100-200	029-0-110-470
029-0-031-115	029-0-070-060	029-0-100-235	029-0-110-480
029-0-031-170	029-0-070-070	029-0-100-255	029-0-110-490
029-0-031-185	029-0-070-080	029-0-100-265	029-0-120-021
029-0-031-190	029-0-070-090	029-0-100-275	029-0-120-022
029-0-031-200	029-0-070-100	029-0-100-375	029-0-120-030
029-0-032-020	029-0-070-110	029-0-100-385	029-0-120-040
029-0-032-155	029-0-070-120	029-0-100-395	029-0-120-060
029-0-032-175	029-0-070-140	029-0-100-405	029-0-120-080
029-0-032-185	029-0-070-150	029-0-100-430	029-0-120-090

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029-0-120-100	030-0-030-095	030-0-070-225	030-0-100-395
029-0-120-110	030-0-030-105	030-0-070-240	030-0-100-405
029-0-120-120	030-0-030-115	030-0-070-265	030-0-100-415
029-0-120-130	030-0-030-145	030-0-070-275	030-0-100-425
029-0-120-140	030-0-030-175	030-0-070-280	030-0-100-445
029-0-120-160	030-0-030-195	030-0-070-290	030-0-100-485
029-0-120-180	030-0-030-205	030-0-070-305	030-0-100-495
029-0-130-015	030-0-030-215	030-0-070-315	030-0-100-505
029-0-130-035	030-0-030-255	030-0-090-025	030-0-100-525
029-0-130-045	030-0-030-265	030-0-090-035	030-0-111-015
029-0-130-055	030-0-030-275	030-0-090-075	030-0-111-035
029-0-130-065	030-0-030-315	030-0-090-085	030-0-111-055
029-0-130-075	030-0-030-345	030-0-090-095	030-0-111-065
029-0-130-130	030-0-030-355	030-0-090-115	030-0-111-075
029-0-130-140	030-0-030-365	030-0-090-145	030-0-111-085
029-0-130-155	030-0-030-375	030-0-090-155	030-0-111-095
029-0-130-185	030-0-030-395	030-0-090-165	030-0-111-105
029-0-130-195	030-0-030-405	030-0-090-175	030-0-111-115
029-0-130-205	030-0-030-425	030-0-090-185	030-0-112-025
029-0-130-215	030-0-030-435	030-0-090-205	030-0-112-030
029-0-140-020	030-0-030-445	030-0-090-215	030-0-112-045
029-0-140-030	030-0-030-455	030-0-090-225	030-0-112-055
029-0-140-040	030-0-030-475	030-0-090-245	030-0-120-010
029-0-140-060	030-0-030-495	030-0-090-265	030-0-120-040
029-0-140-100	030-0-030-500	030-0-090-275	030-0-120-050
029-0-140-110	030-0-030-510	030-0-090-285	030-0-120-060
029-0-140-120	030-0-030-525	030-0-090-295	030-0-120-075
029-0-140-130	030-0-030-535	030-0-100-015	030-0-120-105
029-0-140-140	030-0-030-560	030-0-100-025	030-0-120-115
029-0-140-150	030-0-040-070	030-0-100-055	030-0-120-125
030-0-010-010	030-0-040-080	030-0-100-065	030-0-130-045
030-0-010-070	030-0-040-090	030-0-100-085	030-0-130-105
030-0-010-080	030-0-040-100	030-0-100-095	030-0-130-255
030-0-010-090	030-0-040-110	030-0-100-125	030-0-130-265
030-0-020-075	030-0-040-185	030-0-100-135	030-0-130-275
030-0-020-150	030-0-040-195	030-0-100-145	030-0-160-015
030-0-020-160	030-0-040-215	030-0-100-175	030-0-160-025
030-0-020-175	030-0-040-225	030-0-100-195	030-0-160-035
030-0-020-200	030-0-040-235	030-0-100-245	030-0-160-045
030-0-020-210	030-0-040-245	030-0-100-255	030-0-160-075
030-0-020-220	030-0-040-265	030-0-100-275	030-0-160-095
030-0-030-020	030-0-040-270	030-0-100-295	030-0-160-105
030-0-030-030	030-0-070-055	030-0-100-325	030-0-160-165
030-0-030-050	030-0-070-105	030-0-100-335	030-0-160-175
030-0-030-060	030-0-070-115	030-0-100-345	030-0-160-185
030-0-030-070	030-0-070-185	030-0-100-385	030-0-160-240

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030-0-160-255	030-0-220-155	031-0-062-175	031-0-094-045
030-0-160-265	030-0-220-165	031-0-070-105	031-0-094-075
030-0-160-275	030-0-220-215	031-0-070-115	031-0-094-085
030-0-160-295	030-0-220-235	031-0-070-125	031-0-094-115
030-0-160-305	030-0-220-245	031-0-070-135	031-0-094-125
030-0-170-050	030-0-220-255	031-0-070-195	031-0-094-135
030-0-170-080	030-0-220-275	031-0-070-220	031-0-094-145
030-0-170-100	030-0-220-295	031-0-070-240	031-0-094-155
030-0-170-110	030-0-220-325	031-0-070-260	031-0-094-175
030-0-170-120	030-0-220-335	031-0-070-270	031-0-094-185
030-0-170-140	030-0-220-345	031-0-070-280	031-0-094-195
030-0-170-190	030-0-220-355	031-0-070-290	031-0-094-215
030-0-170-200	030-0-220-365	031-0-070-300	031-0-094-225
030-0-180-055	030-0-230-015	031-0-070-320	031-0-094-235
030-0-190-115	030-0-230-025	031-0-091-015	031-0-094-250
030-0-190-135	030-0-230-035	031-0-091-035	031-0-094-265
030-0-190-165	030-0-230-045	031-0-091-045	031-0-094-295
030-0-190-175	030-0-230-055	031-0-091-085	031-0-094-305
030-0-190-205	030-0-230-065	031-0-091-095	031-0-094-315
030-0-190-225	030-0-230-075	031-0-091-105	031-0-094-345
030-0-190-235	030-0-230-085	031-0-091-135	031-0-094-375
030-0-190-245	030-0-230-105	031-0-091-155	031-0-094-385
030-0-190-255	030-0-230-115	031-0-091-165	031-0-094-395
030-0-190-265	030-0-230-125	031-0-092-015	031-0-094-435
030-0-200-015	030-0-230-135	031-0-092-035	031-0-094-445
030-0-200-031	030-0-230-145	031-0-092-065	031-0-094-455
030-0-200-032	030-0-230-155	031-0-092-075	031-0-094-465
030-0-200-045	030-0-230-165	031-0-092-085	031-0-094-475
030-0-200-055	030-0-230-175	031-0-092-105	031-0-094-485
030-0-200-065	030-0-230-215	031-0-092-115	031-0-094-505
030-0-200-075	030-0-230-235	031-0-092-125	031-0-094-515
030-0-200-085	030-0-230-245	031-0-092-135	031-0-094-525
030-0-220-015	030-0-230-255	031-0-093-025	031-0-094-535
030-0-220-025	030-0-230-275	031-0-093-045	031-0-094-555
030-0-220-035	030-0-230-285	031-0-093-055	031-0-094-575
030-0-220-045	030-0-230-295	031-0-093-065	031-0-094-585
030-0-220-055	030-0-230-305	031-0-093-075	031-0-094-595
030-0-220-065	030-0-240-010	031-0-093-085	031-0-094-605
030-0-220-075	030-0-240-035	031-0-093-095	031-0-094-615
030-0-220-085	030-0-240-045	031-0-093-115	031-0-094-625
030-0-220-095	030-0-240-055	031-0-093-135	031-0-094-635
030-0-220-105	030-0-240-065	031-0-093-155	031-0-094-645
030-0-220-115	030-0-240-075	031-0-093-165	031-0-101-030
030-0-220-125	030-0-240-085	031-0-093-175	031-0-101-045
030-0-220-135	031-0-062-155	031-0-093-185	031-0-101-055
030-0-220-145	031-0-062-165	031-0-093-195	031-0-101-065

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031-0-101-075	031-0-111-325	031-0-113-045	031-0-114-315
031-0-101-085	031-0-111-335	031-0-113-055	031-0-114-325
031-0-101-095	031-0-111-375	031-0-113-095	031-0-120-010
031-0-101-110	031-0-111-385	031-0-113-145	031-0-120-170
031-0-101-135	031-0-111-425	031-0-113-155	031-0-120-180
031-0-101-145	031-0-111-435	031-0-113-180	031-0-160-125
031-0-101-155	031-0-111-445	031-0-113-190	031-0-171-030
031-0-101-165	031-0-111-455	031-0-113-205	031-0-174-090
031-0-101-175	031-0-111-475	031-0-113-215	031-0-183-020
031-0-101-185	031-0-111-495	031-0-113-235	031-0-183-030
031-0-101-195	031-0-111-505	031-0-113-255	031-0-183-040
031-0-101-205	031-0-111-515	031-0-113-285	031-0-183-050
031-0-101-215	031-0-111-525	031-0-113-295	031-0-183-120
031-0-101-225	031-0-111-575	031-0-113-305	031-0-183-130
031-0-101-235	031-0-111-585	031-0-113-325	031-0-183-140
031-0-101-265	031-0-111-595	031-0-113-355	031-0-190-010
031-0-101-275	031-0-111-625	031-0-113-365	031-0-190-060
031-0-101-285	031-0-111-635	031-0-113-375	031-0-190-180
031-0-101-295	031-0-111-675	031-0-113-385	031-0-190-380
031-0-101-305	031-0-111-685	031-0-113-395	031-0-190-475
031-0-101-315	031-0-111-695	031-0-113-405	031-0-190-485
031-0-101-325	031-0-111-705	031-0-113-415	031-0-190-490
031-0-101-335	031-0-111-715	031-0-113-425	031-0-190-535
031-0-101-345	031-0-111-725	031-0-113-435	031-0-190-625
031-0-101-355	031-0-111-755	031-0-113-445	031-0-190-680
031-0-101-365	031-0-111-775	031-0-114-045	031-0-200-015
031-0-101-375	031-0-112-015	031-0-114-055	031-0-200-025
031-0-101-385	031-0-112-045	031-0-114-065	031-0-200-035
031-0-101-395	031-0-112-075	031-0-114-085	031-0-200-045
031-0-101-405	031-0-112-085	031-0-114-095	031-0-200-055
031-0-111-035	031-0-112-095	031-0-114-105	031-0-200-065
031-0-111-045	031-0-112-105	031-0-114-115	031-0-200-075
031-0-111-055	031-0-112-145	031-0-114-125	031-0-200-085
031-0-111-065	031-0-112-155	031-0-114-135	031-0-200-095
031-0-111-075	031-0-112-175	031-0-114-155	031-0-200-105
031-0-111-085	031-0-112-215	031-0-114-165	031-0-200-115
031-0-111-095	031-0-112-255	031-0-114-175	031-0-200-125
031-0-111-105	031-0-112-265	031-0-114-195	031-0-200-135
031-0-111-115	031-0-112-275	031-0-114-205	031-0-200-145
031-0-111-145	031-0-112-295	031-0-114-215	031-0-200-155
031-0-111-155	031-0-112-305	031-0-114-235	031-0-200-165
031-0-111-215	031-0-112-345	031-0-114-245	031-0-200-185
031-0-111-225	031-0-112-355	031-0-114-265	031-0-200-195
031-0-111-235	031-0-112-365	031-0-114-275	031-0-200-205
031-0-111-245	031-0-112-375	031-0-114-295	031-0-200-215
031-0-111-255	031-0-113-035	031-0-114-305	031-0-210-025

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031-0-210-065	032-0-020-165	032-0-061-015	032-0-130-105
031-0-210-075	032-0-030-015	032-0-061-035	032-0-130-115
031-0-210-115	032-0-030-025	032-0-061-045	032-0-130-120
031-0-210-125	032-0-030-035	032-0-061-055	032-0-130-195
031-0-210-175	032-0-030-045	032-0-061-065	032-0-130-205
031-0-210-225	032-0-030-055	032-0-061-075	032-0-130-215
031-0-210-245	032-0-030-075	032-0-061-085	032-0-130-245
031-0-210-255	032-0-030-085	032-0-061-095	032-0-140-430
031-0-210-285	032-0-030-095	032-0-061-105	032-0-150-030
031-0-210-305	032-0-030-105	032-0-062-015	032-0-150-040
031-0-210-315	032-0-030-115	032-0-062-025	032-0-150-065
031-0-210-375	032-0-030-125	032-0-062-045	032-0-150-075
031-0-210-395	032-0-041-015	032-0-062-055	032-0-150-080
031-0-210-405	032-0-041-025	032-0-062-095	032-0-150-100
031-0-210-415	032-0-041-045	032-0-062-135	032-0-172-015
031-0-210-425	032-0-041-055	032-0-062-145	032-0-172-025
031-0-222-075	032-0-041-065	032-0-062-155	032-0-172-085
031-0-222-085	032-0-041-075	032-0-062-165	032-0-172-095
031-0-222-095	032-0-041-085	032-0-062-175	032-0-172-105
031-0-223-025	032-0-041-095	032-0-062-185	032-0-174-045
031-0-223-060	032-0-041-105	032-0-062-195	032-0-174-065
031-0-223-075	032-0-041-115	032-0-062-215	032-0-174-095
031-0-223-085	032-0-041-125	032-0-062-225	032-0-174-110
031-0-223-115	032-0-041-135	032-0-063-025	032-0-174-120
031-0-223-125	032-0-042-025	032-0-063-055	032-0-174-190
031-0-223-200	032-0-042-035	032-0-063-065	032-0-175-065
032-0-010-015	032-0-042-055	032-0-063-075	032-0-175-075
032-0-010-030	032-0-042-065	032-0-063-095	032-0-175-085
032-0-010-040	032-0-042-075	032-0-063-105	032-0-175-095
032-0-010-065	032-0-050-025	032-0-070-030	032-0-175-125
032-0-010-085	032-0-050-035	032-0-070-070	032-0-176-045
032-0-010-120	032-0-050-045	032-0-070-085	032-0-176-055
032-0-010-130	032-0-050-055	032-0-070-105	032-0-176-065
032-0-010-150	032-0-050-065	032-0-110-015	032-0-176-075
032-0-010-160	032-0-050-075	032-0-120-015	032-0-176-095
032-0-020-015	032-0-050-095	032-0-120-030	032-0-176-105
032-0-020-055	032-0-050-105	032-0-120-040	032-0-176-115
032-0-020-065	032-0-050-125	032-0-120-050	032-0-176-125
032-0-020-075	032-0-050-135	032-0-120-065	032-0-176-135
032-0-020-095	032-0-050-145	032-0-120-075	032-0-177-015
032-0-020-105	032-0-050-165	032-0-120-085	032-0-177-025
032-0-020-115	032-0-050-225	032-0-120-115	032-0-177-035
032-0-020-125	032-0-050-235	032-0-120-125	032-0-177-045
032-0-020-135	032-0-050-255	032-0-130-050	032-0-177-065
032-0-020-145	032-0-050-265	032-0-130-060	032-0-177-075
032-0-020-155	032-0-050-275	032-0-130-080	032-0-177-085

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032-0-177-095	032-0-222-065	032-0-243-325	032-0-261-045
032-0-177-105	032-0-222-075	032-0-243-335	032-0-262-015
032-0-192-015	032-0-222-085	032-0-243-345	032-0-262-025
032-0-192-160	032-0-230-025	032-0-243-355	032-0-262-035
032-0-192-175	032-0-230-035	032-0-243-365	032-0-262-045
032-0-192-180	032-0-230-045	032-0-243-375	032-0-262-055
032-0-192-190	032-0-230-055	032-0-243-385	032-0-262-065
032-0-201-015	032-0-230-065	032-0-260-015	032-0-262-075
032-0-201-025	032-0-230-075	032-0-260-025	032-0-262-085
032-0-201-055	032-0-230-085	032-0-260-035	032-0-263-015
032-0-201-085	032-0-230-095	032-0-260-045	032-0-263-025
032-0-201-105	032-0-230-400	032-0-260-055	032-0-263-035
032-0-201-115	032-0-242-195	032-0-260-065	032-0-263-045
032-0-201-145	032-0-242-205	032-0-260-075	032-0-263-055
032-0-201-155	032-0-242-215	032-0-260-085	032-0-263-065
032-0-201-165	032-0-242-225	032-0-260-095	032-0-263-075
032-0-201-205	032-0-242-235	032-0-260-105	032-0-263-085
032-0-201-225	032-0-242-245	032-0-260-115	032-0-263-095
032-0-201-235	032-0-242-255	032-0-260-125	032-0-263-105
032-0-202-015	032-0-242-265	032-0-260-135	032-0-263-115
032-0-202-055	032-0-242-275	032-0-260-145	032-0-263-125
032-0-202-065	032-0-242-285	032-0-260-155	032-0-263-135
032-0-202-075	032-0-242-295	032-0-260-165	032-0-263-145
032-0-202-095	032-0-242-315	032-0-260-175	032-0-263-155
032-0-202-105	032-0-242-325	032-0-260-185	032-0-263-165
032-0-202-115	032-0-242-335	032-0-260-195	032-0-263-175
032-0-221-065	032-0-242-345	032-0-260-205	032-0-263-185
032-0-221-075	032-0-242-355	032-0-260-215	032-0-263-195
032-0-221-085	032-0-242-365	032-0-260-225	032-0-263-205
032-0-221-095	032-0-243-065	032-0-260-235	032-0-263-215
032-0-221-105	032-0-243-075	032-0-260-245	032-0-263-225
032-0-221-115	032-0-243-085	032-0-260-255	032-0-263-235
032-0-221-125	032-0-243-095	032-0-260-265	032-0-263-245
032-0-221-135	032-0-243-195	032-0-260-275	032-0-263-255
032-0-221-145	032-0-243-205	032-0-260-285	032-0-263-260
032-0-221-215	032-0-243-215	032-0-260-295	032-0-264-015
032-0-221-225	032-0-243-225	032-0-260-305	032-0-264-025
032-0-221-235	032-0-243-235	032-0-260-315	032-0-264-035
032-0-221-245	032-0-243-245	032-0-260-325	032-0-264-045
032-0-221-255	032-0-243-255	032-0-260-335	032-0-264-055
032-0-221-265	032-0-243-265	032-0-260-345	032-0-264-065
032-0-221-275	032-0-243-275	032-0-260-355	032-0-264-075
032-0-221-285	032-0-243-285	032-0-260-365	032-0-264-085
032-0-221-315	032-0-243-295	032-0-261-015	032-0-264-095
032-0-221-325	032-0-243-305	032-0-261-025	032-0-264-105
032-0-221-335	032-0-243-315	032-0-261-035	032-0-264-115

Parcels

032-0-264-125	032-0-267-145	032-0-269-195	033-0-030-175
032-0-264-135	032-0-267-155	032-0-269-205	033-0-030-180
032-0-264-145	032-0-267-165	032-0-269-215	033-0-030-190
032-0-264-155	032-0-267-175	032-0-269-225	033-0-030-205
032-0-264-165	032-0-267-185	033-0-020-015	033-0-030-215
032-0-264-175	032-0-267-195	033-0-020-085	033-0-030-225
032-0-264-185	032-0-267-205	033-0-020-095	033-0-030-235
032-0-264-195	032-0-267-215	033-0-020-110	033-0-040-030
032-0-265-015	032-0-268-015	033-0-020-135	033-0-040-060
032-0-265-025	032-0-268-025	033-0-020-175	033-0-040-070
032-0-265-035	032-0-268-035	033-0-020-185	033-0-040-085
032-0-265-045	032-0-268-045	033-0-020-195	033-0-040-090
032-0-265-055	032-0-268-055	033-0-020-205	033-0-040-100
032-0-265-065	032-0-268-065	033-0-020-215	033-0-040-110
032-0-265-075	032-0-268-075	033-0-020-225	033-0-040-130
032-0-265-085	032-0-268-085	033-0-020-245	033-0-040-140
032-0-266-015	032-0-268-095	033-0-020-255	033-0-040-150
032-0-266-025	032-0-268-105	033-0-020-275	033-0-040-165
032-0-266-035	032-0-268-115	033-0-020-285	033-0-040-175
032-0-266-045	032-0-268-125	033-0-020-305	033-0-040-185
032-0-266-055	032-0-268-135	033-0-020-335	033-0-040-225
032-0-266-065	032-0-268-145	033-0-020-345	033-0-040-230
032-0-266-075	032-0-268-155	033-0-020-385	033-0-040-250
032-0-266-085	032-0-268-165	033-0-020-395	033-0-040-280
032-0-266-095	032-0-268-175	033-0-020-405	033-0-040-290
032-0-266-105	032-0-268-185	033-0-020-415	033-0-040-400
032-0-266-115	032-0-268-195	033-0-020-425	033-0-040-410
032-0-266-125	032-0-268-205	033-0-020-435	033-0-040-435
032-0-266-135	032-0-269-015	033-0-020-445	033-0-040-445
032-0-266-145	032-0-269-025	033-0-020-450	033-0-040-455
032-0-266-155	032-0-269-035	033-0-020-460	033-0-050-020
032-0-266-165	032-0-269-045	033-0-020-475	033-0-050-040
032-0-266-175	032-0-269-055	033-0-020-485	033-0-050-050
032-0-267-015	032-0-269-065	033-0-030-015	033-0-050-060
032-0-267-025	032-0-269-075	033-0-030-025	033-0-050-120
032-0-267-035	032-0-269-085	033-0-030-030	033-0-050-130
032-0-267-045	032-0-269-095	033-0-030-040	033-0-050-180
032-0-267-055	032-0-269-105	033-0-030-050	033-0-050-190
032-0-267-065	032-0-269-115	033-0-030-075	033-0-050-210
032-0-267-075	032-0-269-125	033-0-030-080	033-0-050-240
032-0-267-085	032-0-269-135	033-0-030-115	033-0-050-250
032-0-267-095	032-0-269-145	033-0-030-125	033-0-050-280
032-0-267-105	032-0-269-155	033-0-030-130	033-0-050-290
032-0-267-115	032-0-269-165	033-0-030-145	033-0-050-300
032-0-267-125	032-0-269-175	033-0-030-155	033-0-050-310
032-0-267-135	032-0-269-185	033-0-030-165	033-0-050-320

Parcels

033-0-050-330	033-0-060-680	033-0-100-120	033-0-291-065
033-0-050-340	033-0-060-690	033-0-100-155	033-0-291-075
033-0-050-350	033-0-060-705	033-0-100-165	033-0-291-085
033-0-050-380	033-0-060-725	033-0-100-170	033-0-291-095
033-0-050-390	033-0-060-735	033-0-100-180	033-0-291-105
033-0-050-400	033-0-060-740	033-0-110-035	033-0-291-115
033-0-050-410	033-0-060-765	033-0-110-095	033-0-293-015
033-0-050-420	033-0-060-775	033-0-110-115	033-0-293-025
033-0-050-430	033-0-060-785	033-0-110-215	033-0-350-020
033-0-050-460	033-0-060-855	033-0-110-235	033-0-350-115
033-0-050-490	033-0-060-865	033-0-110-245	033-0-350-155
033-0-050-540	033-0-060-875	033-0-110-275	033-0-350-225
033-0-050-550	033-0-060-885	033-0-110-285	033-0-350-235
033-0-050-560	033-0-060-895	033-0-110-315	033-0-350-245
033-0-050-570	033-0-070-040	033-0-110-365	033-0-350-295
033-0-050-590	033-0-070-050	033-0-110-375	033-0-350-375
033-0-050-625	033-0-070-115	033-0-110-385	033-0-350-445
033-0-050-635	033-0-070-125	033-0-120-020	033-0-350-455
033-0-050-645	033-0-070-135	033-0-120-035	033-0-350-495
033-0-050-655	033-0-081-010	033-0-120-070	033-0-350-505
033-0-050-665	033-0-082-015	033-0-120-095	033-0-350-515
033-0-050-670	033-0-082-040	033-0-120-100	033-0-350-525
033-0-050-680	033-0-082-075	033-0-120-135	033-0-350-535
033-0-060-010	033-0-082-080	033-0-120-145	033-0-350-545
033-0-060-105	033-0-082-090	033-0-120-150	033-0-350-555
033-0-060-190	033-0-082-115	033-0-120-160	033-0-350-575
033-0-060-205	033-0-082-125	033-0-120-185	033-0-350-585
033-0-060-245	033-0-082-135	033-0-120-190	033-0-350-595
033-0-060-285	033-0-090-015	033-0-120-200	033-0-350-625
033-0-060-315	033-0-090-020	033-0-120-215	033-0-380-015
033-0-060-355	033-0-090-045	033-0-120-225	033-0-380-025
033-0-060-365	033-0-090-055	033-0-120-235	033-0-380-035
033-0-060-375	033-0-090-065	033-0-130-025	033-0-380-045
033-0-060-405	033-0-090-075	033-0-130-085	033-0-380-055
033-0-060-415	033-0-090-080	033-0-130-105	033-0-380-065
033-0-060-490	033-0-090-090	033-0-130-110	033-0-380-075
033-0-060-500	033-0-090-105	033-0-150-540	033-0-380-085
033-0-060-525	033-0-090-115	033-0-150-555	033-0-380-095
033-0-060-535	033-0-100-010	033-0-160-010	033-0-380-105
033-0-060-560	033-0-100-020	033-0-200-365	033-0-380-115
033-0-060-575	033-0-100-045	033-0-270-020	033-0-410-015
033-0-060-585	033-0-100-055	033-0-270-595	033-0-410-075
033-0-060-605	033-0-100-060	033-0-270-640	033-0-420-125
033-0-060-625	033-0-100-090	033-0-280-235	033-0-440-035
033-0-060-660	033-0-100-100	033-0-280-245	033-0-440-045
033-0-060-670	033-0-100-115	033-0-280-255	033-0-440-055

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033-0-440-065	034-0-102-185	035-0-020-010	035-0-100-275
033-0-440-075	034-0-104-075	035-0-030-055	035-0-100-285
033-0-440-085	034-0-104-090	035-0-030-065	035-0-100-295
033-0-440-095	034-0-104-115	035-0-030-075	035-0-100-315
033-0-440-105	034-0-104-125	035-0-030-085	035-0-100-345
033-0-440-115	034-0-104-135	035-0-030-095	035-0-100-355
033-0-440-125	034-0-105-020	035-0-030-105	035-0-120-010
033-0-440-135	034-0-105-055	035-0-030-115	035-0-120-095
033-0-440-145	034-0-105-065	035-0-030-205	035-0-120-100
033-0-440-155	034-0-120-215	035-0-030-215	035-0-120-130
033-0-440-165	034-0-120-225	035-0-030-225	035-0-120-165
033-0-440-215	034-0-150-145	035-0-030-235	035-0-120-175
033-0-440-225	034-0-166-210	035-0-030-275	035-0-120-210
034-0-012-020	034-0-166-260	035-0-030-285	035-0-120-220
034-0-012-055	034-0-211-015	035-0-030-295	035-0-120-230
034-0-030-010	034-0-211-035	035-0-030-325	035-0-120-245
034-0-030-020	034-0-211-045	035-0-030-335	035-0-120-255
034-0-040-025	034-0-211-055	035-0-030-345	035-0-120-265
034-0-040-055	034-0-211-065	035-0-040-025	035-0-120-270
034-0-040-075	034-0-211-075	035-0-040-365	035-0-140-010
034-0-040-080	034-0-211-085	035-0-040-385	035-0-140-065
034-0-040-145	034-0-212-075	035-0-040-435	035-0-140-075
034-0-040-150	034-0-212-095	035-0-040-515	035-0-150-015
034-0-040-160	034-0-240-215	035-0-040-535	035-0-160-035
034-0-040-170	034-0-240-225	035-0-040-545	035-0-160-045
034-0-040-180	034-0-250-015	035-0-040-555	035-0-210-060
034-0-040-200	034-0-250-075	035-0-040-565	035-0-210-165
034-0-040-220	034-0-250-085	035-0-040-575	035-0-210-175
034-0-040-240	034-0-250-095	035-0-040-625	035-0-210-190
034-0-040-250	034-0-250-115	035-0-040-635	035-0-210-200
034-0-040-260	034-0-250-125	035-0-040-655	035-0-210-245
034-0-040-285	034-0-250-135	035-0-040-665	035-0-210-265
034-0-050-060	034-0-250-145	035-0-040-685	035-0-220-075
034-0-050-085	034-0-250-155	035-0-040-695	035-0-220-105
034-0-050-105	034-0-250-185	035-0-040-705	035-0-230-075
034-0-050-265	034-0-250-195	035-0-050-045	035-0-230-105
034-0-050-275	034-0-250-235	035-0-050-055	035-0-230-115
034-0-101-010	034-0-250-285	035-0-050-075	035-0-230-125
034-0-101-020	034-0-260-015	035-0-050-085	035-0-230-135
034-0-101-030	034-0-260-025	035-0-050-115	035-0-230-145
034-0-101-085	034-0-260-035	035-0-090-125	035-0-230-155
034-0-101-125	034-0-260-045	035-0-090-135	035-0-230-185
034-0-101-145	034-0-260-055	035-0-090-195	035-0-230-195
034-0-102-120	034-0-260-135	035-0-090-285	035-0-230-215
034-0-102-150	035-0-010-165	035-0-090-295	035-0-240-035
034-0-102-160	035-0-010-195	035-0-100-260	035-0-240-065

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035-0-240-085	035-0-350-105	037-0-020-435	037-0-080-345
035-0-240-095	035-0-350-115	037-0-031-125	037-0-080-355
035-0-240-105	035-0-350-125	037-0-031-165	037-0-080-365
035-0-240-115	035-0-350-135	037-0-031-175	040-0-010-035
035-0-250-025	035-0-350-145	037-0-070-015	040-0-010-225
035-0-280-015	035-0-350-195	037-0-070-045	040-0-010-345
035-0-280-025	035-0-350-205	037-0-070-055	040-0-010-355
035-0-280-045	037-0-012-015	037-0-070-075	040-0-010-415
035-0-280-095	037-0-012-025	037-0-070-085	040-0-010-465
035-0-280-105	037-0-012-045	037-0-070-105	040-0-010-475
035-0-280-225	037-0-012-075	037-0-070-115	040-0-010-655
035-0-280-235	037-0-012-085	037-0-070-125	040-0-030-015
035-0-280-355	037-0-012-095	037-0-070-155	040-0-030-035
035-0-280-365	037-0-012-105	037-0-070-175	040-0-030-055
035-0-280-425	037-0-012-115	037-0-070-185	040-0-030-070
035-0-290-115	037-0-012-125	037-0-070-195	040-0-030-095
035-0-290-155	037-0-012-135	037-0-070-205	040-0-030-105
035-0-290-165	037-0-012-155	037-0-070-215	040-0-030-115
035-0-290-175	037-0-012-275	037-0-070-225	040-0-030-125
035-0-290-245	037-0-012-345	037-0-070-255	040-0-030-135
035-0-290-265	037-0-012-355	037-0-070-275	040-0-030-170
035-0-300-015	037-0-012-365	037-0-070-295	040-0-030-180
035-0-300-045	037-0-012-375	037-0-070-305	040-0-030-195
035-0-300-055	037-0-012-385	037-0-070-315	040-0-030-205
035-0-300-065	037-0-012-395	037-0-070-325	040-0-030-215
035-0-311-015	037-0-012-415	037-0-070-335	040-0-030-260
035-0-312-035	037-0-012-425	037-0-070-345	040-0-030-270
035-0-320-015	037-0-012-435	037-0-070-355	040-0-030-285
035-0-320-025	037-0-012-445	037-0-070-365	040-0-220-055
035-0-320-035	037-0-012-455	037-0-080-030	040-0-220-065
035-0-340-015	037-0-012-505	037-0-080-065	040-0-220-075
035-0-340-025	037-0-012-515	037-0-080-075	040-0-220-085
035-0-340-035	037-0-012-525	037-0-080-085	040-0-220-095
035-0-340-045	037-0-012-535	037-0-080-115	040-0-220-105
035-0-340-055	037-0-012-545	037-0-080-125	040-0-220-115
035-0-340-065	037-0-012-555	037-0-080-155	040-0-220-125
035-0-340-075	037-0-020-185	037-0-080-160	040-0-220-140
035-0-340-085	037-0-020-195	037-0-080-175	040-0-220-150
035-0-340-095	037-0-020-225	037-0-080-185	040-0-220-165
035-0-340-105	037-0-020-245	037-0-080-195	040-0-220-175
035-0-340-115	037-0-020-285	037-0-080-205	040-0-220-215
035-0-340-125	037-0-020-345	037-0-080-215	040-0-220-220
035-0-340-135	037-0-020-355	037-0-080-245	040-0-220-235
035-0-340-145	037-0-020-375	037-0-080-305	040-0-220-245
035-0-340-155	037-0-020-415	037-0-080-315	040-0-220-255
035-0-350-095	037-0-020-425	037-0-080-325	040-0-220-265

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040-0-220-270	060-0-230-190	060-0-252-710	060-0-320-065
040-0-220-285	060-0-230-200	060-0-260-010	060-0-320-075
040-0-220-295	060-0-230-210	060-0-260-020	060-0-320-080
040-0-220-305	060-0-240-010	060-0-260-030	060-0-320-090
040-0-220-315	060-0-240-100	060-0-260-050	060-0-320-125
040-0-220-325	060-0-240-120	060-0-260-060	060-0-320-135
040-0-220-335	060-0-240-170	060-0-260-070	060-0-320-145
040-0-220-345	060-0-240-240	060-0-270-010	060-0-320-195
040-0-220-355	060-0-240-250	060-0-270-050	060-0-320-215
040-0-220-365	060-0-240-270	060-0-270-065	060-0-320-225
040-0-220-375	060-0-240-280	060-0-270-070	060-0-320-235
060-0-150-185	060-0-240-290	060-0-270-085	060-0-320-245
060-0-150-195	060-0-240-300	060-0-270-105	060-0-320-255
060-0-180-090	060-0-240-310	060-0-270-165	060-0-320-265
060-0-180-110	060-0-240-320	060-0-270-195	060-0-320-275
060-0-180-130	060-0-240-330	060-0-270-200	060-0-320-285
060-0-180-160	060-0-240-390	060-0-270-220	061-0-011-010
060-0-180-170	060-0-240-455	060-0-270-235	061-0-031-310
060-0-180-180	060-0-240-465	060-0-270-240	061-0-055-135
060-0-200-090	060-0-251-020	060-0-280-050	061-0-055-145
060-0-200-110	060-0-251-050	060-0-280-070	061-0-055-205
060-0-200-130	060-0-251-100	060-0-290-015	061-0-062-065
060-0-210-150	060-0-251-110	060-0-290-035	061-0-062-075
060-0-220-050	060-0-252-020	060-0-290-040	061-0-062-085
060-0-220-085	060-0-252-030	060-0-290-050	061-0-064-055
060-0-220-110	060-0-252-040	060-0-300-015	061-0-064-075
060-0-220-120	060-0-252-050	060-0-300-025	061-0-064-085
060-0-220-140	060-0-252-060	060-0-300-035	061-0-064-095
060-0-220-150	060-0-252-070	060-0-300-045	061-0-064-115
060-0-220-200	060-0-252-080	060-0-300-055	061-0-064-125
060-0-220-210	060-0-252-100	060-0-300-065	061-0-066-015
060-0-220-230	060-0-252-200	060-0-300-075	061-0-066-025
060-0-220-240	060-0-252-230	060-0-300-095	061-0-066-075
060-0-220-260	060-0-252-290	060-0-300-100	061-0-066-085
060-0-220-270	060-0-252-305	060-0-310-085	061-0-070-020
060-0-230-025	060-0-252-330	060-0-310-095	061-0-080-010
060-0-230-035	060-0-252-340	060-0-310-105	061-0-080-025
060-0-230-040	060-0-252-350	060-0-310-115	061-0-080-055
060-0-230-050	060-0-252-360	060-0-310-120	061-0-080-065
060-0-230-065	060-0-252-370	060-0-310-155	061-0-080-160
060-0-230-080	060-0-252-380	060-0-310-165	061-0-080-330
060-0-230-090	060-0-252-410	060-0-310-175	061-0-080-415
060-0-230-105	060-0-252-505	060-0-310-185	061-0-090-025
060-0-230-110	060-0-252-540	060-0-310-225	061-0-090-215
060-0-230-120	060-0-252-560	060-0-310-235	061-0-090-220
060-0-230-170	060-0-252-700	060-0-320-050	061-0-090-230

Parcels

061-0-090-240	061-0-171-100	061-0-181-310	061-0-190-195
061-0-090-250	061-0-171-110	061-0-181-320	061-0-190-200
061-0-090-260	061-0-171-120	061-0-181-330	061-0-190-210
061-0-090-275	061-0-171-150	061-0-181-340	061-0-190-220
061-0-110-030	061-0-171-160	061-0-181-350	061-0-190-230
061-0-110-040	061-0-171-170	061-0-181-370	061-0-190-240
061-0-110-070	061-0-171-180	061-0-181-380	061-0-190-255
061-0-110-095	061-0-171-210	061-0-181-390	061-0-190-260
061-0-140-255	061-0-171-220	061-0-181-400	061-0-190-275
061-0-150-015	061-0-171-230	061-0-181-410	061-0-190-285
061-0-150-030	061-0-171-265	061-0-182-030	061-0-201-010
061-0-150-170	061-0-171-275	061-0-182-040	061-0-201-030
061-0-150-180	061-0-171-285	061-0-182-050	061-0-201-040
061-0-150-235	061-0-171-295	061-0-182-070	061-0-201-050
061-0-150-240	061-0-171-300	061-0-182-100	061-0-201-060
061-0-150-260	061-0-171-310	061-0-182-110	061-0-201-070
061-0-150-270	061-0-171-320	061-0-182-150	061-0-201-080
061-0-150-285	061-0-171-330	061-0-182-160	061-0-201-090
061-0-160-040	061-0-172-010	061-0-182-170	061-0-201-100
061-0-160-105	061-0-172-030	061-0-182-180	061-0-201-110
061-0-160-110	061-0-172-040	061-0-182-200	061-0-201-120
061-0-160-120	061-0-172-050	061-0-182-225	061-0-201-130
061-0-160-130	061-0-172-060	061-0-182-235	061-0-201-140
061-0-160-140	061-0-172-070	061-0-182-240	061-0-201-180
061-0-160-150	061-0-172-080	061-0-182-250	061-0-201-190
061-0-160-160	061-0-172-110	061-0-182-265	061-0-201-210
061-0-160-170	061-0-172-130	061-0-182-275	061-0-201-260
061-0-160-180	061-0-181-020	061-0-182-280	061-0-201-270
061-0-160-205	061-0-181-045	061-0-182-340	061-0-201-280
061-0-160-225	061-0-181-050	061-0-182-350	061-0-201-300
061-0-160-235	061-0-181-060	061-0-182-365	061-0-201-310
061-0-160-245	061-0-181-080	061-0-190-020	061-0-201-320
061-0-160-285	061-0-181-090	061-0-190-030	061-0-201-350
061-0-160-315	061-0-181-105	061-0-190-050	061-0-202-010
061-0-160-320	061-0-181-120	061-0-190-060	061-0-202-020
061-0-160-335	061-0-181-165	061-0-190-070	061-0-202-030
061-0-160-345	061-0-181-190	061-0-190-080	061-0-202-040
061-0-160-355	061-0-181-200	061-0-190-090	061-0-202-060
061-0-160-365	061-0-181-230	061-0-190-110	061-0-202-070
061-0-171-010	061-0-181-240	061-0-190-120	061-0-211-040
061-0-171-020	061-0-181-250	061-0-190-130	061-0-211-065
061-0-171-030	061-0-181-260	061-0-190-140	061-0-211-105
061-0-171-040	061-0-181-270	061-0-190-150	061-0-211-115
061-0-171-050	061-0-181-280	061-0-190-160	061-0-211-135
061-0-171-080	061-0-181-290	061-0-190-170	061-0-211-145
061-0-171-090	061-0-181-300	061-0-190-180	061-0-211-165

Parcels

061-0-211-185	061-0-230-080	063-0-030-060	063-0-060-210
061-0-211-195	061-0-230-145	063-0-030-080	063-0-060-245
061-0-211-205	061-0-230-155	063-0-030-090	063-0-060-255
061-0-211-225	061-0-230-175	063-0-030-100	063-0-060-260
061-0-211-235	061-0-230-180	063-0-030-110	063-0-071-015
061-0-211-245	061-0-230-235	063-0-030-125	063-0-071-025
061-0-211-255	061-0-230-260	063-0-030-135	063-0-071-035
061-0-212-015	061-0-230-270	063-0-040-015	063-0-071-045
061-0-212-020	061-0-230-290	063-0-040-025	063-0-071-055
061-0-212-045	061-0-230-335	063-0-040-055	063-0-071-065
061-0-212-050	061-0-230-340	063-0-040-060	063-0-071-075
061-0-212-070	061-0-230-365	063-0-040-085	063-0-071-085
061-0-212-080	061-0-230-395	063-0-040-095	063-0-071-095
061-0-212-090	061-0-230-410	063-0-040-120	063-0-071-105
061-0-212-100	061-0-230-420	063-0-040-130	063-0-071-115
061-0-212-115	061-0-230-430	063-0-040-160	063-0-071-125
061-0-212-120	061-0-230-440	063-0-040-175	063-0-071-145
061-0-212-130	0611-0-250-075	063-0-050-030	063-0-072-015
061-0-212-150	061-0-250-085	063-0-050-040	063-0-072-025
061-0-212-160	061-0-250-095	063-0-050-055	063-0-072-035
061-0-212-170	061-0-250-105	063-0-050-060	063-0-072-045
061-0-212-180	061-0-250-115	063-0-050-090	063-0-072-055
061-0-212-190	061-0-260-020	063-0-050-100	063-0-072-065
061-0-212-200	061-0-260-030	063-0-050-115	063-0-072-075
061-0-212-215	061-0-260-050	063-0-050-125	063-0-072-085
061-0-212-220	061-0-260-115	063-0-050-145	063-0-072-095
061-0-212-230	061-0-260-120	063-0-050-190	063-0-072-105
061-0-212-240	061-0-260-130	063-0-050-200	063-0-072-115
061-0-212-250	061-0-260-160	063-0-050-220	063-0-072-125
061-0-212-280	061-0-260-170	063-0-050-245	063-0-072-135
061-0-212-315	061-0-260-190	063-0-050-265	063-0-072-145
061-0-220-010	063-0-020-130	063-0-050-270	063-0-072-155
061-0-220-020	063-0-020-140	063-0-050-280	063-0-072-165
061-0-220-030	063-0-020-150	063-0-050-290	063-0-072-175
061-0-220-040	063-0-020-160	063-0-050-305	063-0-072-185
061-0-220-050	063-0-020-190	063-0-050-310	063-0-072-195
061-0-220-065	063-0-020-210	063-0-050-320	063-0-072-205
061-0-220-070	063-0-020-235	063-0-050-345	063-0-072-215
061-0-220-080	063-0-020-250	063-0-050-355	063-0-072-225
061-0-220-090	063-0-020-260	063-0-050-360	063-0-073-015
061-0-220-100	063-0-020-280	063-0-060-020	063-0-073-025
061-0-220-110	063-0-020-300	063-0-060-045	063-0-073-035
061-0-220-120	063-0-020-320	063-0-060-110	063-0-073-045
061-0-230-020	063-0-020-340	063-0-060-130	063-0-073-055
061-0-230-040	063-0-020-360	063-0-060-150	063-0-073-065
061-0-230-050	063-0-030-050	063-0-060-180	063-0-073-075

Parcels

063-0-073-085	063-0-075-205	063-0-082-125	063-0-092-215
063-0-073-095	063-0-075-215	063-0-082-135	063-0-092-225
063-0-073-105	063-0-075-225	063-0-082-145	063-0-092-235
063-0-073-115	063-0-077-015	063-0-082-155	063-0-092-245
063-0-073-125	063-0-077-025	063-0-082-165	063-0-092-255
063-0-074-015	063-0-077-035	063-0-082-175	063-0-092-265
063-0-074-025	063-0-077-045	063-0-083-015	063-0-092-275
063-0-074-035	063-0-077-055	063-0-083-025	063-0-092-285
063-0-074-045	063-0-077-065	063-0-084-025	063-0-092-295
063-0-074-055	063-0-077-075	063-0-084-055	063-0-093-015
063-0-074-065	063-0-077-085	063-0-091-015	063-0-093-025
063-0-074-075	063-0-077-095	063-0-091-025	063-0-093-035
063-0-074-085	063-0-077-105	063-0-091-035	063-0-093-045
063-0-074-095	063-0-077-115	063-0-091-045	063-0-093-055
063-0-074-105	063-0-077-125	063-0-091-055	063-0-093-065
063-0-074-115	063-0-081-035	063-0-091-065	063-0-093-075
063-0-074-125	063-0-081-225	063-0-091-075	063-0-093-085
063-0-074-135	063-0-081-245	063-0-091-085	063-0-093-095
063-0-074-145	063-0-081-255	063-0-091-095	063-0-093-105
063-0-074-155	063-0-081-265	063-0-091-105	063-0-093-115
063-0-074-165	063-0-081-275	063-0-091-115	063-0-093-125
063-0-074-175	063-0-081-285	063-0-091-125	063-0-094-015
063-0-074-185	063-0-081-295	063-0-091-135	063-0-094-025
063-0-074-195	063-0-081-305	063-0-091-145	063-0-094-035
063-0-074-205	063-0-081-315	063-0-091-155	063-0-094-045
063-0-074-215	063-0-081-325	063-0-091-165	063-0-094-055
063-0-074-225	063-0-081-335	063-0-092-015	063-0-094-065
063-0-075-015	063-0-081-345	063-0-092-025	063-0-094-075
063-0-075-025	063-0-081-355	063-0-092-035	063-0-094-085
063-0-075-035	063-0-081-365	063-0-092-045	063-0-094-095
063-0-075-045	063-0-081-375	063-0-092-055	063-0-094-105
063-0-075-055	063-0-081-395	063-0-092-065	063-0-094-115
063-0-075-065	063-0-081-405	063-0-092-075	063-0-094-125
063-0-075-075	063-0-081-415	063-0-092-085	063-0-094-135
063-0-075-085	063-0-081-435	063-0-092-095	063-0-094-145
063-0-075-095	063-0-082-015	063-0-092-105	063-0-094-155
063-0-075-105	063-0-082-025	063-0-092-115	063-0-094-165
063-0-075-115	063-0-082-035	063-0-092-125	063-0-094-175
063-0-075-125	063-0-082-045	063-0-092-135	063-0-094-185
063-0-075-135	063-0-082-055	063-0-092-145	063-0-095-015
063-0-075-145	063-0-082-065	063-0-092-155	063-0-095-025
063-0-075-155	063-0-082-075	063-0-092-165	063-0-095-035
063-0-075-165	063-0-082-085	063-0-092-175	063-0-095-045
063-0-075-175	063-0-082-095	063-0-092-185	063-0-095-055
063-0-075-185	063-0-082-105	063-0-092-195	063-0-095-065
063-0-075-195	063-0-082-115	063-0-092-205	063-0-095-075

Parcels

063-0-095-085	063-0-120-315	063-0-132-175	063-0-152-025
063-0-095-095	063-0-131-010	063-0-132-185	063-0-152-035
063-0-095-105	063-0-131-020	063-0-132-195	063-0-152-045
063-0-095-115	063-0-131-035	063-0-132-205	063-0-152-055
063-0-095-125	063-0-131-045	063-0-132-215	063-0-152-075
063-0-095-135	063-0-131-055	063-0-132-225	063-0-152-085
063-0-101-015	063-0-131-065	063-0-132-235	063-0-152-095
063-0-101-025	063-0-131-075	063-0-132-245	063-0-152-125
063-0-101-035	063-0-131-085	063-0-132-255	063-0-152-130
063-0-101-045	063-0-131-095	063-0-132-265	063-0-152-145
063-0-101-055	063-0-131-105	063-0-132-275	063-0-152-150
063-0-101-065	063-0-131-115	063-0-140-040	063-0-152-160
063-0-101-075	063-0-131-125	063-0-140-085	063-0-152-175
063-0-101-085	063-0-131-135	063-0-140-240	063-0-152-215
063-0-101-095	063-0-131-145	063-0-140-250	063-0-152-245
063-0-101-105	063-0-131-155	063-0-140-275	063-0-152-265
063-0-101-115	063-0-131-165	063-0-140-290	063-0-152-275
063-0-102-015	063-0-131-175	063-0-140-395	063-0-152-285
063-0-102-025	063-0-131-185	063-0-140-405	063-0-152-305
063-0-102-035	063-0-131-195	063-0-140-410	063-0-152-315
063-0-102-045	063-0-131-205	063-0-140-475	063-0-152-325
063-0-102-055	063-0-131-215	063-0-140-515	063-0-152-365
063-0-102-065	063-0-131-225	063-0-140-525	063-0-152-375
063-0-102-075	063-0-131-235	063-0-140-575	063-0-152-385
063-0-102-085	063-0-131-245	063-0-140-605	063-0-152-395
063-0-102-095	063-0-131-255	063-0-140-615	063-0-152-425
063-0-102-105	063-0-131-265	063-0-140-665	063-0-152-435
063-0-102-115	063-0-131-275	063-0-140-675	063-0-152-445
063-0-102-125	063-0-131-285	063-0-151-025	063-0-152-455
063-0-102-135	063-0-131-295	063-0-151-045	063-0-153-020
063-0-103-015	063-0-132-015	063-0-151-065	063-0-153-085
063-0-110-065	063-0-132-025	063-0-151-075	063-0-153-095
063-0-110-090	063-0-132-035	063-0-151-085	063-0-153-105
063-0-110-135	063-0-132-045	063-0-151-095	063-0-153-115
063-0-110-145	063-0-132-055	063-0-151-115	063-0-153-125
063-0-110-155	063-0-132-065	063-0-151-125	063-0-153-135
063-0-110-165	063-0-132-075	063-0-151-135	063-0-153-145
063-0-110-175	063-0-132-085	063-0-151-155	063-0-153-155
063-0-120-015	063-0-132-095	063-0-151-165	063-0-153-165
063-0-120-020	063-0-132-105	063-0-151-175	063-0-153-175
063-0-120-095	063-0-132-115	063-0-151-185	063-0-153-185
063-0-120-165	063-0-132-125	063-0-151-365	063-0-153-195
063-0-120-215	063-0-132-135	063-0-151-385	063-0-153-205
063-0-120-235	063-0-132-145	063-0-151-395	063-0-153-215
063-0-120-295	063-0-132-155	063-0-151-405	063-0-161-030
063-0-120-305	063-0-132-165	063-0-151-415	063-0-161-040

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063-0-161-060	063-0-171-095	063-0-172-375	063-0-180-465
063-0-161-070	063-0-171-105	063-0-172-385	063-0-180-475
063-0-161-080	063-0-171-115	063-0-172-395	063-0-180-480
063-0-161-090	063-0-171-125	063-0-172-405	063-0-180-490
063-0-161-100	063-0-171-135	063-0-172-425	063-0-180-500
063-0-162-050	063-0-171-140	063-0-172-435	063-0-190-045
063-0-162-060	063-0-171-155	063-0-172-445	063-0-190-085
063-0-162-075	063-0-171-160	063-0-172-465	063-0-190-125
063-0-162-100	063-0-171-175	063-0-172-475	063-0-190-145
063-0-162-115	063-0-171-185	063-0-172-485	063-0-190-165
063-0-162-120	063-0-171-190	063-0-173-015	063-0-190-255
063-0-162-130	063-0-171-205	063-0-173-035	063-0-190-265
063-0-162-145	063-0-171-215	063-0-173-045	063-0-190-275
063-0-162-155	063-0-171-225	063-0-173-055	063-0-200-015
063-0-162-160	063-0-171-230	063-0-173-085	063-0-200-021
063-0-162-170	063-0-171-240	063-0-173-095	063-0-200-022
063-0-162-180	063-0-172-045	063-0-173-105	063-0-200-035
063-0-162-195	063-0-172-055	063-0-173-115	063-0-200-040
063-0-162-205	063-0-172-060	063-0-173-125	063-0-200-050
063-0-162-255	063-0-172-070	063-0-173-135	063-0-200-120
063-0-162-265	063-0-172-085	063-0-173-140	063-0-200-170
063-0-162-275	063-0-172-095	063-0-173-170	063-0-200-190
063-0-162-285	063-0-172-105	063-0-173-185	063-0-200-210
063-0-162-295	063-0-172-110	063-0-173-195	063-0-200-230
063-0-162-315	063-0-172-125	063-0-173-200	063-0-200-275
063-0-162-320	063-0-172-130	063-0-173-215	063-0-210-020
063-0-162-335	063-0-172-140	063-0-173-225	063-0-210-045
063-0-162-355	063-0-172-150	063-0-173-245	063-0-210-065
063-0-162-375	063-0-172-160	063-0-180-030	063-0-210-075
063-0-162-425	063-0-172-170	063-0-180-055	063-0-210-085
063-0-162-440	063-0-172-205	063-0-180-060	063-0-210-095
063-0-162-450	063-0-172-210	063-0-180-070	063-0-210-105
063-0-162-460	063-0-172-235	063-0-180-085	063-0-210-115
063-0-162-475	063-0-172-245	063-0-180-090	063-0-210-125
063-0-162-485	063-0-172-255	063-0-180-100	063-0-220-020
063-0-162-505	063-0-172-265	063-0-180-110	063-0-220-085
063-0-162-515	063-0-172-275	063-0-180-130	063-0-220-095
063-0-162-525	063-0-172-285	063-0-180-140	063-0-220-100
063-0-162-535	063-0-172-295	063-0-180-165	063-0-220-110
063-0-171-020	063-0-172-305	063-0-180-210	063-0-220-125
063-0-171-035	063-0-172-315	063-0-180-220	063-0-220-135
063-0-171-040	063-0-172-325	063-0-180-295	063-0-220-145
063-0-171-050	063-0-172-335	063-0-180-305	063-0-220-155
063-0-171-065	063-0-172-345	063-0-180-320	063-0-220-165
063-0-171-070	063-0-172-355	063-0-180-385	064-0-010-015
063-0-171-080	063-0-172-365	063-0-180-445	064-0-080-045

Parcels

064-0-150-040	068-0-070-055	068-0-090-330	068-0-112-010
064-0-150-115	068-0-070-075	068-0-090-340	068-0-112-020
064-0-150-125	068-0-070-095	068-0-090-355	068-0-112-030
064-0-150-135	068-0-070-105	068-0-090-365	068-0-112-050
064-0-150-155	068-0-070-115	068-0-090-375	068-0-112-060
068-0-010-015	068-0-070-135	068-0-090-385	068-0-113-020
068-0-010-025	068-0-070-145	068-0-090-430	068-0-113-030
068-0-020-010	068-0-081-015	068-0-090-440	068-0-113-040
068-0-020-025	068-0-081-021	068-0-090-485	068-0-113-050
068-0-030-020	068-0-081-022	068-0-090-495	068-0-113-060
068-0-030-030	068-0-082-035	068-0-090-505	068-0-113-070
068-0-030-045	068-0-082-095	068-0-090-515	068-0-113-080
068-0-030-050	068-0-082-125	068-0-090-525	068-0-113-090
068-0-030-070	068-0-082-135	068-0-090-535	068-0-113-100
068-0-030-085	068-0-083-015	068-0-090-545	068-0-113-110
068-0-040-015	068-0-083-095	068-0-090-555	068-0-113-120
068-0-040-025	068-0-083-105	068-0-090-565	068-0-113-140
068-0-040-030	068-0-083-125	068-0-090-570	068-0-113-150
068-0-040-045	068-0-083-135	068-0-101-040	068-0-113-160
068-0-040-050	068-0-083-155	068-0-101-065	068-0-113-170
068-0-040-085	068-0-083-165	068-0-101-075	068-0-113-180
068-0-040-125	068-0-083-175	068-0-101-080	068-0-113-190
068-0-040-135	068-0-083-185	068-0-101-095	068-0-113-200
068-0-040-145	068-0-090-025	068-0-101-105	068-0-113-210
068-0-040-155	068-0-090-035	068-0-101-110	068-0-113-220
068-0-051-025	068-0-090-045	068-0-101-120	068-0-113-240
068-0-051-035	068-0-090-055	068-0-101-140	068-0-113-255
068-0-052-010	068-0-090-065	068-0-101-150	068-0-113-265
068-0-052-035	068-0-090-085	068-0-101-160	068-0-113-275
068-0-052-040	068-0-090-095	068-0-102-010	068-0-113-280
068-0-052-075	068-0-090-105	068-0-102-020	068-0-113-295
068-0-052-085	068-0-090-115	068-0-102-030	068-0-113-300
068-0-052-105	068-0-090-125	068-0-102-040	068-0-113-310
068-0-052-145	068-0-090-135	068-0-102-050	068-0-113-320
068-0-052-155	068-0-090-145	068-0-102-060	068-0-113-335
068-0-052-185	068-0-090-155	068-0-102-070	068-0-113-345
068-0-052-195	068-0-090-175	068-0-102-080	068-0-113-350
068-0-052-255	068-0-090-185	068-0-102-090	068-0-113-395
068-0-060-015	068-0-090-245	068-0-102-110	068-0-113-415
068-0-060-025	068-0-090-250	068-0-102-150	068-0-113-425
068-0-060-215	068-0-090-260	068-0-102-160	068-0-113-430
068-0-060-225	068-0-090-270	068-0-102-185	068-0-113-440
068-0-070-015	068-0-090-280	068-0-111-015	068-0-113-455
068-0-070-025	068-0-090-290	068-0-111-025	068-0-113-460
068-0-070-035	068-0-090-300	068-0-111-075	068-0-113-475
068-0-070-045	068-0-090-310	068-0-111-085	068-0-114-015

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068-0-114-030	068-0-123-075	068-0-124-230	068-0-150-145
068-0-114-040	068-0-123-080	068-0-124-240	068-0-150-155
068-0-114-055	068-0-123-095	068-0-124-250	068-0-150-165
068-0-114-065	068-0-123-100	068-0-124-260	068-0-150-175
068-0-114-075	068-0-123-115	068-0-124-275	068-0-150-185
068-0-114-090	068-0-123-155	068-0-124-280	068-0-150-195
068-0-114-105	068-0-123-160	068-0-124-290	068-0-150-205
068-0-114-110	068-0-123-170	068-0-124-300	068-0-150-215
068-0-114-125	068-0-123-185	068-0-124-310	068-0-150-225
068-0-114-130	068-0-123-190	068-0-124-320	068-0-150-235
068-0-114-140	068-0-123-200	068-0-124-335	068-0-150-245
068-0-114-165	068-0-123-210	068-0-124-375	068-0-150-255
068-0-114-170	068-0-123-220	068-0-124-385	068-0-150-265
068-0-114-185	068-0-123-230	068-0-131-025	068-0-150-275
068-0-114-190	068-0-123-240	068-0-131-045	068-0-150-285
068-0-114-200	068-0-123-255	068-0-132-015	068-0-150-295
068-0-114-210	068-0-123-270	068-0-132-040	068-0-150-305
068-0-114-225	068-0-123-285	068-0-132-105	068-0-150-315
068-0-114-230	068-0-123-290	068-0-132-115	068-0-150-325
068-0-114-245	068-0-123-300	068-0-141-015	068-0-150-335
068-0-114-250	068-0-123-310	068-0-142-020	068-0-150-345
068-0-114-260	068-0-123-320	068-0-142-030	068-0-150-355
068-0-114-270	068-0-123-330	068-0-142-045	068-0-150-365
068-0-114-285	068-0-123-340	068-0-142-065	068-0-150-395
068-0-114-290	068-0-123-360	068-0-142-070	068-0-150-405
068-0-114-300	068-0-124-010	068-0-142-100	068-0-161-015
068-0-114-310	068-0-124-020	068-0-142-115	068-0-161-025
068-0-114-320	068-0-124-035	068-0-142-135	068-0-162-015
068-0-114-330	068-0-124-040	068-0-142-145	068-0-162-025
068-0-114-340	068-0-124-055	068-0-142-155	068-0-162-035
068-0-114-360	068-0-124-060	068-0-142-175	068-0-162-045
068-0-114-370	068-0-124-070	068-0-142-185	068-0-162-055
068-0-114-380	068-0-124-080	068-0-142-195	068-0-163-015
068-0-114-390	068-0-124-095	068-0-142-205	068-0-163-025
068-0-121-015	068-0-124-105	068-0-142-215	068-0-163-035
068-0-121-020	068-0-124-115	068-0-142-220	068-0-163-045
068-0-121-030	068-0-124-120	068-0-142-230	068-0-163-055
068-0-122-040	068-0-124-135	068-0-142-245	068-0-163-065
068-0-122-055	068-0-124-145	068-0-150-055	068-0-163-075
068-0-122-065	068-0-124-150	068-0-150-065	068-0-163-085
068-0-123-015	068-0-124-160	068-0-150-075	068-0-163-095
068-0-123-020	068-0-124-175	068-0-150-095	068-0-163-105
068-0-123-030	068-0-124-195	068-0-150-105	068-0-163-115
068-0-123-045	068-0-124-200	068-0-150-115	068-0-163-125
068-0-123-050	068-0-124-215	068-0-150-125	068-0-163-135
068-0-123-060	068-0-124-225	068-0-150-135	068-0-163-145

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068-0-163-155	068-0-165-065	068-0-180-055	068-0-190-105
068-0-163-165	068-0-165-075	068-0-180-065	068-0-190-115
068-0-163-175	068-0-165-085	068-0-180-075	068-0-190-125
068-0-163-185	068-0-165-095	068-0-180-085	068-0-190-135
068-0-163-195	068-0-165-105	068-0-180-095	068-0-190-145
068-0-163-205	068-0-165-115	068-0-180-105	068-0-190-155
068-0-163-215	068-0-165-125	068-0-180-115	068-0-190-165
068-0-163-225	068-0-165-135	068-0-180-125	068-0-190-175
068-0-163-235	068-0-165-145	068-0-180-135	068-0-190-185
068-0-163-245	068-0-170-015	068-0-180-145	068-0-190-195
068-0-163-255	068-0-170-045	068-0-180-155	068-0-190-205
068-0-164-015	068-0-170-055	068-0-180-165	068-0-190-215
068-0-164-025	068-0-170-065	068-0-180-175	068-0-190-225
068-0-164-035	068-0-170-075	068-0-180-185	068-0-190-235
068-0-164-045	068-0-170-085	068-0-180-195	068-0-190-245
068-0-164-055	068-0-170-095	068-0-180-205	068-0-190-255
068-0-164-065	068-0-170-105	068-0-180-215	068-0-190-265
068-0-164-075	068-0-170-115	068-0-180-225	068-0-190-275
068-0-164-085	068-0-170-125	068-0-180-235	068-0-190-285
068-0-164-095	068-0-170-135	068-0-180-245	068-0-190-295
068-0-164-105	068-0-170-145	068-0-180-255	068-0-190-305
068-0-164-115	068-0-170-155	068-0-180-265	068-0-190-315
068-0-164-125	068-0-170-165	068-0-180-275	068-0-190-325
068-0-164-135	068-0-170-175	068-0-180-285	068-0-190-335
068-0-164-145	068-0-170-185	068-0-180-295	068-0-190-345
068-0-164-155	068-0-170-195	068-0-180-305	068-0-190-355
068-0-164-165	068-0-170-205	068-0-180-315	068-0-190-365
068-0-164-175	068-0-170-215	068-0-180-325	068-0-200-015
068-0-164-185	068-0-170-225	068-0-180-335	068-0-200-025
068-0-164-195	068-0-170-235	068-0-180-345	068-0-200-035
068-0-164-205	068-0-170-245	068-0-180-355	068-0-200-045
068-0-164-215	068-0-170-255	068-0-180-365	068-0-200-055
068-0-164-225	068-0-170-265	068-0-180-375	068-0-200-065
068-0-164-235	068-0-170-275	068-0-180-385	068-0-200-075
068-0-164-245	068-0-170-285	068-0-180-395	068-0-200-085
068-0-164-255	068-0-170-295	068-0-180-405	068-0-200-095
068-0-164-265	068-0-170-305	068-0-180-415	069-0-010-020
068-0-164-275	068-0-170-315	068-0-180-425	069-0-010-075
068-0-164-285	068-0-170-325	068-0-190-025	069-0-010-145
068-0-164-295	068-0-170-335	068-0-190-035	069-0-010-165
068-0-164-305	068-0-170-345	068-0-190-045	069-0-010-175
068-0-165-015	068-0-170-355	068-0-190-055	069-0-010-185
068-0-165-025	068-0-180-015	068-0-190-065	069-0-020-015
068-0-165-035	068-0-180-025	068-0-190-075	069-0-020-020
068-0-165-045	068-0-180-035	068-0-190-085	069-0-020-165
068-0-165-055	068-0-180-045	068-0-190-095	069-0-020-305

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069-0-020-315	069-0-043-275	069-0-052-165	069-0-053-225
069-0-020-325	069-0-043-285	069-0-052-175	069-0-060-015
069-0-030-030	069-0-043-295	069-0-052-185	069-0-060-040
069-0-030-110	069-0-043-325	069-0-052-195	069-0-060-050
069-0-030-180	069-0-043-345	069-0-052-205	069-0-060-090
069-0-041-015	069-0-043-350	069-0-052-215	069-0-060-100
069-0-041-025	069-0-043-365	069-0-052-235	069-0-060-110
069-0-041-035	069-0-043-375	069-0-052-245	069-0-060-120
069-0-041-045	069-0-043-385	069-0-052-255	069-0-060-130
069-0-041-055	069-0-043-395	069-0-052-265	069-0-071-010
069-0-041-065	069-0-051-015	069-0-052-275	069-0-071-030
069-0-041-075	069-0-051-025	069-0-052-285	069-0-071-040
069-0-041-095	069-0-051-035	069-0-052-295	069-0-071-055
069-0-041-105	069-0-051-045	069-0-052-305	069-0-071-060
069-0-041-115	069-0-051-055	069-0-052-325	069-0-071-075
069-0-042-035	069-0-051-065	069-0-052-335	069-0-071-085
069-0-042-045	069-0-051-075	069-0-052-345	069-0-071-090
069-0-042-055	069-0-051-085	069-0-052-355	069-0-071-100
069-0-042-065	069-0-051-095	069-0-052-370	069-0-072-015
069-0-042-075	069-0-051-105	069-0-052-380	069-0-072-025
069-0-042-095	069-0-051-115	069-0-052-390	069-0-072-035
069-0-042-105	069-0-051-125	069-0-052-405	069-0-072-045
069-0-042-115	069-0-051-135	069-0-052-415	069-0-072-055
069-0-042-125	069-0-051-145	069-0-052-425	069-0-072-065
069-0-042-135	069-0-051-155	069-0-052-435	069-0-072-075
069-0-042-145	069-0-051-165	069-0-052-445	069-0-072-085
069-0-042-185	069-0-051-175	069-0-053-015	069-0-072-095
069-0-042-195	069-0-051-185	069-0-053-025	069-0-072-105
069-0-042-205	069-0-051-195	069-0-053-035	069-0-072-115
069-0-043-025	069-0-051-205	069-0-053-045	069-0-072-125
069-0-043-045	069-0-051-215	069-0-053-055	069-0-072-145
069-0-043-055	069-0-052-015	069-0-053-065	069-0-072-155
069-0-043-065	069-0-052-025	069-0-053-075	069-0-072-165
069-0-043-075	069-0-052-035	069-0-053-085	069-0-072-175
069-0-043-085	069-0-052-045	069-0-053-095	069-0-072-185
069-0-043-095	069-0-052-055	069-0-053-105	069-0-072-195
069-0-043-105	069-0-052-065	069-0-053-115	069-0-072-205
069-0-043-175	069-0-052-075	069-0-053-125	069-0-072-215
069-0-043-185	069-0-052-085	069-0-053-135	069-0-072-245
069-0-043-195	069-0-052-095	069-0-053-145	069-0-073-025
069-0-043-205	069-0-052-105	069-0-053-155	069-0-073-035
069-0-043-210	069-0-052-115	069-0-053-175	069-0-073-045
069-0-043-220	069-0-052-125	069-0-053-185	069-0-073-055
069-0-043-230	069-0-052-135	069-0-053-195	069-0-073-065
069-0-043-240	069-0-052-145	069-0-053-200	069-0-073-075
069-0-043-250	069-0-052-155	069-0-053-215	069-0-073-085

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069-0-073-095	069-0-082-125	069-0-083-175	069-0-091-235
069-0-073-105	069-0-082-135	069-0-083-185	069-0-091-245
069-0-073-115	069-0-082-145	069-0-083-195	069-0-091-255
069-0-073-125	069-0-082-155	069-0-083-205	069-0-091-265
069-0-073-135	069-0-082-165	069-0-083-215	069-0-091-275
069-0-073-145	069-0-082-175	069-0-083-225	069-0-091-285
069-0-073-165	069-0-082-185	069-0-083-235	069-0-091-295
069-0-073-175	069-0-082-195	069-0-083-245	069-0-091-300
069-0-073-185	069-0-082-205	069-0-083-255	069-0-091-310
069-0-073-195	069-0-082-215	069-0-083-265	069-0-091-325
069-0-073-215	069-0-082-225	069-0-083-275	069-0-091-330
069-0-073-225	069-0-082-245	069-0-083-285	069-0-091-340
069-0-073-255	069-0-082-255	069-0-083-295	069-0-091-350
069-0-073-295	069-0-082-265	069-0-083-305	069-0-091-360
069-0-081-015	069-0-082-275	069-0-083-315	069-0-091-370
069-0-081-025	069-0-082-285	069-0-083-325	069-0-091-385
069-0-081-035	069-0-082-295	069-0-083-335	069-0-091-390
069-0-081-045	069-0-082-305	069-0-083-345	069-0-091-405
069-0-081-055	069-0-082-315	069-0-083-355	069-0-091-410
069-0-081-065	069-0-082-325	069-0-083-365	069-0-091-420
069-0-081-075	069-0-082-335	069-0-083-375	069-0-091-430
069-0-081-085	069-0-082-345	069-0-083-385	069-0-092-010
069-0-081-095	069-0-082-355	069-0-083-395	069-0-092-020
069-0-081-105	069-0-082-365	069-0-083-405	069-0-092-035
069-0-081-115	069-0-082-375	069-0-091-015	069-0-092-040
069-0-081-125	069-0-082-385	069-0-091-025	069-0-092-050
069-0-081-135	069-0-082-395	069-0-091-035	069-0-092-065
069-0-081-145	069-0-082-405	069-0-091-045	069-0-092-075
069-0-081-155	069-0-082-415	069-0-091-055	069-0-092-080
069-0-081-165	069-0-082-425	069-0-091-065	069-0-092-100
069-0-081-175	069-0-083-015	069-0-091-075	069-0-092-110
069-0-081-185	069-0-083-025	069-0-091-085	069-0-092-120
069-0-081-195	069-0-083-035	069-0-091-095	069-0-092-130
069-0-081-205	069-0-083-045	069-0-091-105	069-0-092-145
069-0-081-215	069-0-083-055	069-0-091-115	069-0-092-155
069-0-082-015	069-0-083-065	069-0-091-125	069-0-092-160
069-0-082-025	069-0-083-075	069-0-091-135	069-0-092-170
069-0-082-035	069-0-083-085	069-0-091-145	069-0-092-180
069-0-082-045	069-0-083-095	069-0-091-155	069-0-092-190
069-0-082-055	069-0-083-105	069-0-091-165	069-0-092-205
069-0-082-065	069-0-083-115	069-0-091-175	069-0-092-210
069-0-082-075	069-0-083-125	069-0-091-185	069-0-092-220
069-0-082-085	069-0-083-135	069-0-091-195	069-0-101-015
069-0-082-095	069-0-083-145	069-0-091-205	069-0-101-025
069-0-082-105	069-0-083-155	069-0-091-210	069-0-101-035
069-0-082-115	069-0-083-165	069-0-091-225	069-0-101-045

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069-0-101-055	069-0-102-155	069-0-103-285	069-0-112-140
069-0-101-065	069-0-102-165	069-0-103-290	069-0-112-150
069-0-101-075	069-0-102-185	069-0-103-305	069-0-112-160
069-0-101-085	069-0-102-190	069-0-103-310	069-0-112-170
069-0-101-095	069-0-102-205	069-0-103-325	069-0-112-180
069-0-101-105	069-0-102-215	069-0-103-330	069-0-112-190
069-0-101-115	069-0-102-220	069-0-103-340	069-0-112-200
069-0-101-125	069-0-102-235	069-0-103-350	069-0-112-210
069-0-101-135	069-0-102-245	069-0-103-360	069-0-112-220
069-0-101-145	069-0-102-250	069-0-103-370	069-0-112-230
069-0-101-155	069-0-102-260	069-0-111-015	069-0-112-245
069-0-101-165	069-0-102-275	069-0-111-025	069-0-121-010
069-0-101-175	069-0-102-285	069-0-111-030	069-0-121-025
069-0-101-185	069-0-102-290	069-0-111-045	069-0-121-030
069-0-101-195	069-0-102-305	069-0-111-055	069-0-121-040
069-0-101-205	069-0-102-310	069-0-111-065	069-0-121-060
069-0-101-215	069-0-102-325	069-0-111-075	069-0-121-075
069-0-101-225	069-0-102-335	069-0-111-085	069-0-121-085
069-0-101-235	069-0-102-345	069-0-111-090	069-0-121-095
069-0-101-245	069-0-102-355	069-0-111-105	069-0-121-100
069-0-101-255	069-0-103-015	069-0-111-115	069-0-121-110
069-0-101-265	069-0-103-025	069-0-111-125	069-0-121-120
069-0-101-275	069-0-103-035	069-0-111-130	069-0-121-130
069-0-101-285	069-0-103-040	069-0-111-140	069-0-121-140
069-0-101-295	069-0-103-050	069-0-111-170	069-0-121-155
069-0-101-305	069-0-103-060	069-0-111-180	069-0-121-160
069-0-101-315	069-0-103-070	069-0-111-190	069-0-121-170
069-0-101-325	069-0-103-080	069-0-111-200	069-0-121-180
069-0-101-335	069-0-103-095	069-0-111-225	069-0-121-190
069-0-101-345	069-0-103-100	069-0-111-250	069-0-121-200
069-0-101-355	069-0-103-110	069-0-111-260	069-0-121-210
069-0-101-365	069-0-103-130	069-0-111-270	069-0-121-220
069-0-102-015	069-0-103-140	069-0-111-280	069-0-121-230
069-0-102-025	069-0-103-155	069-0-112-010	069-0-121-240
069-0-102-035	069-0-103-160	069-0-112-020	069-0-121-250
069-0-102-045	069-0-103-175	069-0-112-030	069-0-121-260
069-0-102-055	069-0-103-180	069-0-112-040	069-0-121-270
069-0-102-065	069-0-103-190	069-0-112-050	069-0-121-280
069-0-102-075	069-0-103-200	069-0-112-060	069-0-121-290
069-0-102-085	069-0-103-215	069-0-112-070	069-0-121-310
069-0-102-095	069-0-103-220	069-0-112-080	069-0-121-320
069-0-102-105	069-0-103-230	069-0-112-090	069-0-121-330
069-0-102-115	069-0-103-240	069-0-112-100	069-0-121-340
069-0-102-125	069-0-103-250	069-0-112-110	069-0-121-350
069-0-102-135	069-0-103-260	069-0-112-120	069-0-121-365
069-0-102-145	069-0-103-275	069-0-112-130	069-0-121-370

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069-0-121-380	069-0-131-150	069-0-141-145	069-0-151-165
069-0-122-010	069-0-131-160	069-0-141-155	069-0-151-175
069-0-122-020	069-0-131-170	069-0-141-165	069-0-151-185
069-0-122-030	069-0-131-210	069-0-141-175	069-0-151-195
069-0-122-040	069-0-131-250	069-0-141-185	069-0-151-205
069-0-122-050	069-0-131-260	069-0-141-195	069-0-151-215
069-0-122-060	069-0-131-270	069-0-141-205	069-0-151-225
069-0-122-070	069-0-132-010	069-0-141-215	069-0-151-235
069-0-122-080	069-0-132-020	069-0-141-225	069-0-151-245
069-0-122-090	069-0-132-030	069-0-141-235	069-0-151-255
069-0-122-100	069-0-132-040	069-0-142-015	069-0-151-265
069-0-122-110	069-0-132-050	069-0-142-025	069-0-151-275
069-0-122-120	069-0-132-060	069-0-142-035	069-0-152-015
069-0-122-130	069-0-132-070	069-0-142-045	069-0-152-025
069-0-122-140	069-0-132-080	069-0-142-055	069-0-152-035
069-0-122-150	069-0-132-090	069-0-142-065	069-0-152-045
069-0-122-160	069-0-132-100	069-0-142-075	069-0-152-055
069-0-122-170	069-0-132-110	069-0-142-085	069-0-152-065
069-0-122-190	069-0-132-120	069-0-142-095	069-0-152-075
069-0-122-200	069-0-132-130	069-0-142-105	069-0-152-085
069-0-122-210	069-0-132-140	069-0-142-115	069-0-152-095
069-0-122-220	069-0-132-150	069-0-142-125	069-0-152-105
069-0-122-230	069-0-132-160	069-0-142-135	069-0-152-115
069-0-122-260	069-0-132-180	069-0-142-145	069-0-152-125
069-0-122-270	069-0-132-190	069-0-142-155	069-0-152-135
069-0-122-280	069-0-132-200	069-0-143-015	069-0-152-145
069-0-122-295	069-0-132-210	069-0-143-025	069-0-152-155
069-0-122-300	069-0-132-220	069-0-143-035	069-0-152-165
069-0-122-320	069-0-132-230	069-0-143-045	069-0-152-175
069-0-122-330	069-0-132-240	069-0-143-055	069-0-152-185
069-0-122-340	069-0-132-260	069-0-143-065	069-0-152-195
069-0-122-350	069-0-132-270	069-0-151-015	069-0-152-205
069-0-131-010	069-0-132-280	069-0-151-025	069-0-152-215
069-0-131-020	069-0-141-010	069-0-151-035	069-0-152-225
069-0-131-030	069-0-141-025	069-0-151-045	069-0-152-235
069-0-131-040	069-0-141-035	069-0-151-055	069-0-152-245
069-0-131-050	069-0-141-045	069-0-151-065	069-0-153-015
069-0-131-060	069-0-141-055	069-0-151-075	069-0-153-025
069-0-131-070	069-0-141-065	069-0-151-085	069-0-153-035
069-0-131-080	069-0-141-075	069-0-151-095	069-0-153-045
069-0-131-090	069-0-141-085	069-0-151-105	069-0-153-055
069-0-131-100	069-0-141-095	069-0-151-115	069-0-153-065
069-0-131-110	069-0-141-105	069-0-151-125	069-0-153-075
069-0-131-120	069-0-141-115	069-0-151-135	069-0-153-085
069-0-131-130	069-0-141-125	069-0-151-145	069-0-153-095
069-0-131-140	069-0-141-135	069-0-151-155	069-0-153-105

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069-0-153-115	069-0-171-035	069-0-181-185	069-0-183-045
069-0-154-015	069-0-171-045	069-0-181-195	069-0-183-055
069-0-154-025	069-0-171-055	069-0-181-205	069-0-183-065
069-0-154-035	069-0-171-065	069-0-181-215	069-0-183-075
069-0-154-045	069-0-171-075	069-0-181-225	069-0-191-015
069-0-161-015	069-0-171-105	069-0-181-235	069-0-191-025
069-0-161-025	069-0-171-115	069-0-181-245	069-0-191-035
069-0-161-035	069-0-172-015	069-0-181-255	069-0-191-105
069-0-161-045	069-0-172-025	069-0-181-265	069-0-191-115
069-0-161-055	069-0-172-035	069-0-181-275	069-0-191-125
069-0-161-065	069-0-172-045	069-0-181-280	069-0-191-135
069-0-161-075	069-0-172-055	069-0-182-025	069-0-191-145
069-0-161-085	069-0-172-095	069-0-182-035	069-0-191-155
069-0-161-095	069-0-172-105	069-0-182-045	069-0-191-225
069-0-161-105	069-0-172-115	069-0-182-055	069-0-191-235
069-0-161-115	069-0-172-125	069-0-182-065	069-0-191-245
069-0-161-125	069-0-172-145	069-0-182-075	069-0-191-375
069-0-162-015	069-0-172-155	069-0-182-115	069-0-191-385
069-0-162-025	069-0-172-165	069-0-182-125	069-0-191-395
069-0-162-035	069-0-173-025	069-0-182-135	069-0-191-405
069-0-162-045	069-0-173-035	069-0-182-145	069-0-191-415
069-0-162-055	069-0-173-045	069-0-182-155	069-0-191-425
069-0-162-065	069-0-173-055	069-0-182-165	069-0-191-435
069-0-162-075	069-0-173-065	069-0-182-205	069-0-191-445
069-0-162-085	069-0-173-075	069-0-182-215	069-0-192-035
069-0-163-015	069-0-173-085	069-0-182-225	069-0-192-045
069-0-163-025	069-0-173-095	069-0-182-305	069-0-192-055
069-0-163-035	069-0-173-125	069-0-182-315	069-0-192-065
069-0-163-045	069-0-173-135	069-0-182-325	069-0-192-075
069-0-164-015	069-0-181-015	069-0-182-335	069-0-192-085
069-0-164-025	069-0-181-025	069-0-182-345	069-0-192-095
069-0-164-035	069-0-181-035	069-0-182-355	069-0-192-165
069-0-164-045	069-0-181-045	069-0-182-365	069-0-192-175
069-0-164-055	069-0-181-055	069-0-182-375	069-0-192-185
069-0-164-065	069-0-181-065	069-0-182-385	069-0-192-195
069-0-164-075	069-0-181-075	069-0-182-395	069-0-192-205
069-0-164-085	069-0-181-085	069-0-182-405	069-0-192-215
069-0-164-095	069-0-181-095	069-0-182-415	069-0-192-285
069-0-164-105	069-0-181-105	069-0-182-425	069-0-192-295
069-0-164-115	069-0-181-115	069-0-182-435	069-0-192-305
069-0-164-125	069-0-181-125	069-0-182-445	069-0-192-465
069-0-164-135	069-0-181-135	069-0-182-455	069-0-192-475
069-0-164-145	069-0-181-145	069-0-182-465	069-0-192-485
069-0-164-155	069-0-181-155	069-0-183-015	069-0-192-495
069-0-171-015	069-0-181-165	069-0-183-025	069-0-192-505
069-0-171-025	069-0-181-175	069-0-183-035	069-0-192-515

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069-0-192-525	069-0-202-065	069-0-213-045	069-0-221-680
069-0-192-535	069-0-202-075	069-0-221-010	069-0-221-690
069-0-192-545	069-0-202-085	069-0-221-040	069-0-221-700
069-0-192-555	069-0-202-095	069-0-221-050	069-0-221-710
069-0-192-565	069-0-202-105	069-0-221-060	069-0-221-720
069-0-192-575	069-0-202-115	069-0-221-070	069-0-221-730
069-0-192-585	069-0-202-125	069-0-221-080	069-0-221-750
069-0-192-595	069-0-202-135	069-0-221-110	069-0-221-760
069-0-192-605	069-0-202-145	069-0-221-120	069-0-221-780
069-0-192-615	069-0-202-155	069-0-221-130	069-0-221-800
069-0-192-625	069-0-202-165	069-0-221-140	069-0-221-810
069-0-192-635	069-0-202-175	069-0-221-160	069-0-221-820
069-0-192-645	069-0-202-185	069-0-221-170	069-0-221-830
069-0-193-015	069-0-202-195	069-0-221-190	069-0-222-020
069-0-193-025	069-0-211-015	069-0-221-200	069-0-222-030
069-0-193-035	069-0-211-025	069-0-221-210	069-0-222-040
069-0-193-045	069-0-211-035	069-0-221-230	069-0-222-050
069-0-193-055	069-0-211-045	069-0-221-240	069-0-222-060
069-0-193-065	069-0-211-055	069-0-221-250	069-0-222-070
069-0-193-075	069-0-211-065	069-0-221-260	069-0-222-080
069-0-194-015	069-0-211-075	069-0-221-270	069-0-222-090
069-0-194-025	069-0-211-085	069-0-221-300	069-0-222-100
069-0-194-035	069-0-211-095	069-0-221-310	069-0-222-110
069-0-194-045	069-0-211-105	069-0-221-320	069-0-222-120
069-0-201-015	069-0-211-115	069-0-221-340	069-0-222-140
069-0-201-025	069-0-211-125	069-0-221-350	069-0-222-150
069-0-201-035	069-0-211-135	069-0-221-360	069-0-222-160
069-0-201-045	069-0-211-145	069-0-221-370	069-0-222-170
069-0-201-055	069-0-211-155	069-0-221-380	069-0-222-180
069-0-201-065	069-0-211-165	069-0-221-420	069-0-222-190
069-0-201-075	069-0-212-015	069-0-221-430	069-0-222-200
069-0-201-085	069-0-212-025	069-0-221-440	069-0-222-210
069-0-201-095	069-0-212-035	069-0-221-450	069-0-222-230
069-0-201-105	069-0-212-045	069-0-221-460	069-0-222-240
069-0-201-115	069-0-212-055	069-0-221-470	069-0-222-250
069-0-201-125	069-0-212-065	069-0-221-480	069-0-222-260
069-0-201-135	069-0-212-075	069-0-221-490	069-0-222-280
069-0-201-145	069-0-212-085	069-0-221-500	069-0-222-290
069-0-201-155	069-0-212-095	069-0-221-510	069-0-222-300
069-0-201-165	069-0-212-105	069-0-221-570	069-0-222-310
069-0-201-175	069-0-212-115	069-0-221-580	069-0-222-320
069-0-202-015	069-0-212-125	069-0-221-590	069-0-222-370
069-0-202-025	069-0-212-135	069-0-221-600	069-0-222-380
069-0-202-035	069-0-213-015	069-0-221-610	069-0-222-390
069-0-202-045	069-0-213-025	069-0-221-660	069-0-222-400
069-0-202-055	069-0-213-035	069-0-221-670	069-0-222-410

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069-0-222-430	069-0-231-335	069-0-233-065	069-0-240-155
069-0-222-440	069-0-231-345	069-0-233-075	069-0-240-185
069-0-222-450	069-0-231-355	069-0-233-085	069-0-240-195
069-0-222-460	069-0-231-385	069-0-233-095	069-0-240-205
069-0-222-470	069-0-231-415	069-0-233-105	069-0-240-215
069-0-222-480	069-0-231-425	069-0-233-115	069-0-240-235
069-0-222-490	069-0-231-435	069-0-233-125	069-0-240-245
069-0-222-500	069-0-231-445	069-0-233-135	069-0-240-255
069-0-222-510	069-0-231-455	069-0-233-145	069-0-240-265
069-0-222-520	069-0-231-485	069-0-233-155	069-0-240-275
069-0-222-540	069-0-231-495	069-0-233-165	069-0-240-285
069-0-222-550	069-0-231-505	069-0-233-175	069-0-251-045
069-0-222-560	069-0-231-515	069-0-233-185	069-0-251-055
069-0-222-570	069-0-231-535	069-0-233-195	069-0-251-065
069-0-222-580	069-0-231-545	069-0-233-205	069-0-251-075
069-0-222-590	069-0-231-555	069-0-233-215	069-0-251-085
069-0-222-600	069-0-231-565	069-0-233-225	069-0-251-095
069-0-222-610	069-0-231-575	069-0-233-235	069-0-251-105
069-0-223-010	069-0-231-595	069-0-233-245	069-0-251-115
069-0-224-010	069-0-231-635	069-0-233-255	069-0-251-125
069-0-231-025	069-0-231-645	069-0-233-265	069-0-251-135
069-0-231-035	069-0-231-655	069-0-233-275	069-0-251-145
069-0-231-045	069-0-231-665	069-0-233-285	069-0-251-155
069-0-231-055	069-0-231-675	069-0-233-295	069-0-251-165
069-0-231-065	069-0-231-685	069-0-233-305	069-0-251-175
069-0-231-075	069-0-231-705	069-0-233-315	069-0-251-185
069-0-231-085	069-0-231-715	069-0-233-325	069-0-251-205
069-0-231-095	069-0-231-725	069-0-233-335	069-0-251-215
069-0-231-105	069-0-231-745	069-0-233-345	069-0-251-225
069-0-231-115	069-0-231-755	069-0-233-355	069-0-251-235
069-0-231-125	069-0-231-765	069-0-233-365	069-0-251-245
069-0-231-135	069-0-231-775	069-0-233-375	069-0-251-255
069-0-231-155	069-0-231-785	069-0-233-385	069-0-251-265
069-0-231-165	069-0-231-815	069-0-233-395	069-0-251-275
069-0-231-175	069-0-231-825	069-0-233-405	069-0-251-285
069-0-231-205	069-0-231-835	069-0-233-415	069-0-251-295
069-0-231-215	069-0-231-845	069-0-233-425	069-0-251-305
069-0-231-225	069-0-231-855	069-0-233-435	069-0-251-315
069-0-231-235	069-0-231-865	069-0-240-025	069-0-252-015
069-0-231-245	069-0-231-935	069-0-240-055	069-0-252-025
069-0-231-265	069-0-231-945	069-0-240-075	069-0-253-025
069-0-231-275	069-0-231-965	069-0-240-105	069-0-253-035
069-0-231-285	069-0-231-975	069-0-240-115	069-0-253-045
069-0-231-295	069-0-232-015	069-0-240-125	069-0-253-055
069-0-231-315	069-0-232-025	069-0-240-135	069-0-253-065
069-0-231-325	069-0-233-055	069-0-240-145	069-0-253-075

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069-0-253-085	069-0-263-325	069-0-270-385	069-0-280-205
069-0-253-095	069-0-263-335	069-0-270-395	069-0-280-215
069-0-261-015	069-0-263-345	069-0-270-405	069-0-280-225
069-0-261-025	069-0-263-355	069-0-270-415	069-0-280-235
069-0-261-035	069-0-263-365	069-0-270-425	069-0-280-245
069-0-261-045	069-0-263-375	069-0-270-435	069-0-280-255
069-0-261-065	069-0-263-385	069-0-270-445	069-0-280-265
069-0-261-075	069-0-263-395	069-0-270-455	069-0-280-275
069-0-261-085	069-0-263-405	069-0-270-465	069-0-280-285
069-0-261-095	069-0-263-415	069-0-270-475	069-0-280-295
069-0-261-105	069-0-263-425	069-0-270-485	069-0-280-305
069-0-262-015	069-0-263-435	069-0-270-495	069-0-280-315
069-0-262-025	069-0-263-445	069-0-270-505	069-0-280-325
069-0-262-035	069-0-263-455	069-0-270-515	069-0-280-335
069-0-262-045	069-0-270-065	069-0-270-525	069-0-280-345
069-0-262-055	069-0-270-075	069-0-270-535	069-0-280-355
069-0-262-075	069-0-270-085	069-0-270-545	069-0-280-365
069-0-262-095	069-0-270-095	069-0-270-555	069-0-280-375
069-0-262-105	069-0-270-105	069-0-270-565	069-0-280-385
069-0-262-115	069-0-270-115	069-0-270-575	069-0-280-395
069-0-262-125	069-0-270-125	069-0-270-585	069-0-280-405
069-0-262-135	069-0-270-135	069-0-270-595	069-0-280-415
069-0-262-145	069-0-270-145	069-0-270-605	069-0-280-425
069-0-262-155	069-0-270-155	069-0-270-615	069-0-280-435
069-0-262-165	069-0-270-165	069-0-270-625	069-0-280-445
069-0-262-175	069-0-270-175	069-0-270-635	069-0-280-455
069-0-262-185	069-0-270-185	069-0-270-645	069-0-280-465
069-0-262-195	069-0-270-195	069-0-270-655	069-0-280-475
069-0-263-015	069-0-270-205	069-0-280-025	069-0-280-485
069-0-263-035	069-0-270-215	069-0-280-035	069-0-280-495
069-0-263-045	069-0-270-225	069-0-280-045	069-0-280-505
069-0-263-055	069-0-270-235	069-0-280-055	069-0-280-515
069-0-263-125	069-0-270-245	069-0-280-065	069-0-280-525
069-0-263-195	069-0-270-255	069-0-280-075	069-0-280-535
069-0-263-205	069-0-270-265	069-0-280-085	069-0-280-545
069-0-263-215	069-0-270-275	069-0-280-095	069-0-280-555
069-0-263-225	069-0-270-285	069-0-280-105	069-0-280-565
069-0-263-235	069-0-270-295	069-0-280-115	069-0-280-575
069-0-263-245	069-0-270-305	069-0-280-125	069-0-280-585
069-0-263-255	069-0-270-315	069-0-280-135	069-0-290-015
069-0-263-265	069-0-270-325	069-0-280-145	069-0-290-035
069-0-263-275	069-0-270-335	069-0-280-155	069-0-290-045
069-0-263-285	069-0-270-345	069-0-280-165	069-0-290-055
069-0-263-295	069-0-270-355	069-0-280-175	069-0-290-065
069-0-263-305	069-0-270-365	069-0-280-185	069-0-290-075
069-0-263-315	069-0-270-375	069-0-280-195	069-0-290-085

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069-0-290-095	069-0-290-575	069-0-300-235	069-0-300-705
069-0-290-105	069-0-290-585	069-0-300-245	069-0-300-715
069-0-290-115	069-0-290-595	069-0-300-255	069-0-300-725
069-0-290-125	069-0-290-605	069-0-300-265	069-0-300-735
069-0-290-135	069-0-290-615	069-0-300-275	069-0-300-745
069-0-290-145	069-0-290-625	069-0-300-285	069-0-300-755
069-0-290-155	069-0-290-635	069-0-300-295	069-0-300-765
069-0-290-165	069-0-290-645	069-0-300-305	069-0-300-775
069-0-290-175	069-0-290-655	069-0-300-315	069-0-300-785
069-0-290-185	069-0-290-665	069-0-300-325	071-0-010-030
069-0-290-195	069-0-290-675	069-0-300-335	071-0-010-040
069-0-290-205	069-0-290-685	069-0-300-345	071-0-010-050
069-0-290-215	069-0-290-695	069-0-300-355	071-0-010-060
069-0-290-225	069-0-290-705	069-0-300-365	071-0-010-080
069-0-290-235	069-0-290-715	069-0-300-375	071-0-010-110
069-0-290-255	069-0-290-725	069-0-300-385	071-0-010-120
069-0-290-265	069-0-290-735	069-0-300-395	071-0-010-140
069-0-290-275	069-0-290-745	069-0-300-405	071-0-010-150
069-0-290-285	069-0-290-755	069-0-300-415	071-0-010-160
069-0-290-295	069-0-290-765	069-0-300-425	071-0-010-220
069-0-290-305	069-0-290-775	069-0-300-435	071-0-010-310
069-0-290-315	069-0-290-785	069-0-300-445	071-0-010-340
069-0-290-325	069-0-290-795	069-0-300-455	071-0-010-370
069-0-290-335	069-0-290-805	069-0-300-465	071-0-010-380
069-0-290-345	069-0-300-015	069-0-300-475	071-0-010-460
069-0-290-355	069-0-300-025	069-0-300-485	071-0-010-470
069-0-290-365	069-0-300-035	069-0-300-495	071-0-010-480
069-0-290-375	069-0-300-045	069-0-300-505	071-0-010-490
069-0-290-385	069-0-300-055	069-0-300-525	071-0-010-500
069-0-290-395	069-0-300-065	069-0-300-535	071-0-010-520
069-0-290-405	069-0-300-075	069-0-300-545	071-0-010-535
069-0-290-415	069-0-300-085	069-0-300-555	071-0-010-550
069-0-290-425	069-0-300-095	069-0-300-565	071-0-010-560
069-0-290-445	069-0-300-105	069-0-300-575	071-0-021-015
069-0-290-455	069-0-300-115	069-0-300-585	071-0-021-020
069-0-290-465	069-0-300-125	069-0-300-595	071-0-021-030
069-0-290-475	069-0-300-135	069-0-300-605	071-0-021-040
069-0-290-485	069-0-300-145	069-0-300-615	071-0-021-050
069-0-290-495	069-0-300-155	069-0-300-625	071-0-021-060
069-0-290-505	069-0-300-165	069-0-300-635	071-0-021-070
069-0-290-515	069-0-300-175	069-0-300-645	071-0-021-080
069-0-290-525	069-0-300-185	069-0-300-655	071-0-021-090
069-0-290-535	069-0-300-195	069-0-300-665	071-0-021-110
069-0-290-545	069-0-300-205	069-0-300-675	071-0-021-120
069-0-290-555	069-0-300-215	069-0-300-685	071-0-021-130
069-0-290-565	069-0-300-225	069-0-300-695	071-0-021-140

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071-0-021-150	071-0-022-540	071-0-032-485	071-0-051-240
071-0-021-165	071-0-022-550	071-0-032-495	071-0-051-250
071-0-021-170	071-0-031-010	071-0-032-505	071-0-051-280
071-0-021-180	071-0-031-020	071-0-032-515	071-0-051-295
071-0-021-190	071-0-031-030	071-0-033-010	071-0-051-305
071-0-021-200	071-0-031-040	071-0-033-020	071-0-051-310
071-0-021-210	071-0-031-050	071-0-033-030	071-0-051-330
071-0-021-220	071-0-031-060	071-0-033-040	071-0-051-340
071-0-022-010	071-0-031-070	071-0-033-050	071-0-051-350
071-0-022-020	071-0-031-080	071-0-033-060	071-0-051-360
071-0-022-030	071-0-031-090	071-0-033-070	071-0-051-370
071-0-022-040	071-0-031-100	071-0-033-080	071-0-052-020
071-0-022-050	071-0-031-110	071-0-033-090	071-0-053-010
071-0-022-060	071-0-031-120	071-0-033-100	071-0-053-020
071-0-022-070	071-0-031-130	071-0-033-120	071-0-053-040
071-0-022-080	071-0-032-010	071-0-033-130	071-0-053-050
071-0-022-090	071-0-032-025	071-0-033-140	071-0-053-060
071-0-022-170	071-0-032-030	071-0-033-150	071-0-053-070
071-0-022-180	071-0-032-055	071-0-033-160	071-0-053-085
071-0-022-190	071-0-032-065	071-0-033-170	071-0-053-090
071-0-022-200	071-0-032-075	071-0-033-180	071-0-053-100
071-0-022-210	071-0-032-085	071-0-033-195	071-0-053-130
071-0-022-220	071-0-032-090	071-0-040-030	071-0-053-140
071-0-022-230	071-0-032-110	071-0-040-040	071-0-053-150
071-0-022-240	071-0-032-130	071-0-040-050	071-0-053-180
071-0-022-250	071-0-032-140	071-0-040-060	071-0-053-190
071-0-022-260	071-0-032-150	071-0-040-120	071-0-053-200
071-0-022-270	071-0-032-160	071-0-040-130	071-0-053-210
071-0-022-280	071-0-032-170	071-0-040-160	071-0-053-220
071-0-022-310	071-0-032-180	071-0-040-170	071-0-053-230
071-0-022-320	071-0-032-190	071-0-040-180	071-0-053-240
071-0-022-330	071-0-032-200	071-0-040-205	071-0-053-250
071-0-022-340	071-0-032-210	071-0-040-215	071-0-053-260
071-0-022-355	071-0-032-220	071-0-040-220	071-0-053-270
071-0-022-365	071-0-032-230	071-0-051-010	071-0-053-280
071-0-022-370	071-0-032-240	071-0-051-020	071-0-053-290
071-0-022-380	071-0-032-250	071-0-051-030	071-0-053-300
071-0-022-420	071-0-032-260	071-0-051-060	071-0-053-310
071-0-022-430	071-0-032-310	071-0-051-090	071-0-053-320
071-0-022-440	071-0-032-320	071-0-051-100	071-0-053-330
071-0-022-460	071-0-032-360	071-0-051-110	071-0-053-340
071-0-022-480	071-0-032-380	071-0-051-120	071-0-053-350
071-0-022-500	071-0-032-405	071-0-051-140	071-0-053-360
071-0-022-510	071-0-032-415	071-0-051-150	071-0-053-370
071-0-022-520	071-0-032-440	071-0-051-160	071-0-053-380
071-0-022-530	071-0-032-470	071-0-051-170	071-0-053-390

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071-0-053-400	071-0-061-080	071-0-062-040	071-0-071-130
071-0-053-410	071-0-061-090	071-0-062-050	071-0-071-140
071-0-053-425	071-0-061-100	071-0-062-060	071-0-071-150
071-0-053-430	071-0-061-110	071-0-062-070	071-0-071-180
071-0-053-440	071-0-061-120	071-0-062-080	071-0-071-190
071-0-053-450	071-0-061-130	071-0-062-090	071-0-071-200
071-0-053-460	071-0-061-140	071-0-062-105	071-0-071-210
071-0-054-010	071-0-061-150	071-0-062-110	071-0-071-230
071-0-054-030	071-0-061-160	071-0-062-120	071-0-071-240
071-0-054-040	071-0-061-170	071-0-062-130	071-0-071-250
071-0-054-050	071-0-061-180	071-0-062-140	071-0-071-260
071-0-054-060	071-0-061-190	071-0-062-150	071-0-071-275
071-0-054-070	071-0-061-200	071-0-062-160	071-0-071-290
071-0-054-080	071-0-061-210	071-0-062-170	071-0-071-300
071-0-054-090	071-0-061-220	071-0-062-180	071-0-071-310
071-0-054-100	071-0-061-270	071-0-062-190	071-0-071-340
071-0-054-110	071-0-061-280	071-0-062-200	071-0-071-350
071-0-054-120	071-0-061-290	071-0-062-210	071-0-071-360
071-0-054-130	071-0-061-300	071-0-062-220	071-0-072-020
071-0-054-140	071-0-061-310	071-0-062-230	071-0-072-030
071-0-054-150	071-0-061-320	071-0-062-240	071-0-072-040
071-0-054-160	071-0-061-330	071-0-062-250	071-0-072-050
071-0-054-170	071-0-061-340	071-0-062-260	071-0-072-060
071-0-054-180	071-0-061-350	071-0-062-270	071-0-072-070
071-0-054-190	071-0-061-360	071-0-062-280	071-0-072-080
071-0-054-200	071-0-061-370	071-0-062-290	071-0-072-090
071-0-054-210	071-0-061-380	071-0-062-300	071-0-072-100
071-0-054-220	071-0-061-390	071-0-062-310	071-0-072-110
071-0-054-230	071-0-061-400	071-0-062-320	071-0-072-120
071-0-054-240	071-0-061-410	071-0-062-330	071-0-072-130
071-0-054-250	071-0-061-460	071-0-062-340	071-0-072-140
071-0-054-260	071-0-061-470	071-0-062-350	071-0-072-150
071-0-054-270	071-0-061-480	071-0-062-360	071-0-072-160
071-0-054-300	071-0-061-490	071-0-062-370	071-0-072-170
071-0-054-310	071-0-061-500	071-0-062-380	071-0-072-180
071-0-054-320	071-0-061-510	071-0-071-010	071-0-072-200
071-0-054-330	071-0-061-520	071-0-071-020	071-0-072-210
071-0-054-340	071-0-061-530	071-0-071-040	071-0-072-220
071-0-054-350	071-0-061-540	071-0-071-050	071-0-072-230
071-0-054-360	071-0-061-550	071-0-071-060	071-0-072-240
071-0-061-010	071-0-061-560	071-0-071-070	071-0-072-255
071-0-061-020	071-0-061-570	071-0-071-080	071-0-072-260
071-0-061-030	071-0-061-600	071-0-071-090	071-0-072-270
071-0-061-040	071-0-061-610	071-0-071-100	071-0-072-300
071-0-061-060	071-0-061-620	071-0-071-110	071-0-072-310
071-0-061-070	071-0-062-030	071-0-071-120	071-0-072-320

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071-0-081-010	071-0-093-240	071-0-094-320	071-0-102-020
071-0-081-020	071-0-093-255	071-0-094-330	071-0-102-030
071-0-081-030	071-0-093-260	071-0-094-340	071-0-102-040
071-0-081-040	071-0-093-270	071-0-094-360	071-0-102-050
071-0-081-050	071-0-093-280	071-0-094-370	071-0-102-060
071-0-081-060	071-0-093-290	071-0-094-400	071-0-102-070
071-0-081-070	071-0-093-300	071-0-094-410	071-0-102-080
071-0-082-020	071-0-093-310	071-0-095-010	071-0-102-090
071-0-082-030	071-0-093-320	071-0-101-020	071-0-102-100
071-0-082-050	071-0-093-330	071-0-101-030	071-0-102-110
071-0-082-060	071-0-093-340	071-0-101-040	071-0-102-120
071-0-082-070	071-0-093-350	071-0-101-050	071-0-102-130
071-0-082-080	071-0-093-360	071-0-101-060	071-0-102-140
071-0-082-090	071-0-093-370	071-0-101-070	071-0-102-155
071-0-082-100	071-0-093-380	071-0-101-090	071-0-102-160
071-0-082-110	071-0-093-390	071-0-101-100	071-0-102-170
071-0-082-120	071-0-094-010	071-0-101-110	071-0-102-180
071-0-082-135	071-0-094-020	071-0-101-120	071-0-102-190
071-0-082-150	071-0-094-030	071-0-101-130	071-0-102-210
071-0-082-160	071-0-094-040	071-0-101-140	071-0-102-230
071-0-082-170	071-0-094-050	071-0-101-150	071-0-102-240
071-0-082-190	071-0-094-060	071-0-101-160	071-0-102-250
071-0-082-200	071-0-094-070	071-0-101-170	071-0-102-270
071-0-082-210	071-0-094-080	071-0-101-180	071-0-102-290
071-0-093-020	071-0-094-090	071-0-101-200	071-0-102-300
071-0-093-030	071-0-094-100	071-0-101-210	071-0-102-310
071-0-093-040	071-0-094-110	071-0-101-230	071-0-102-320
071-0-093-050	071-0-094-125	071-0-101-240	071-0-102-330
071-0-093-060	071-0-094-130	071-0-101-250	071-0-102-340
071-0-093-070	071-0-094-140	071-0-101-260	071-0-102-355
071-0-093-085	071-0-094-150	071-0-101-270	071-0-102-360
071-0-093-090	071-0-094-160	071-0-101-280	071-0-102-370
071-0-093-100	071-0-094-170	071-0-101-290	071-0-102-380
071-0-093-110	071-0-094-180	071-0-101-300	071-0-102-390
071-0-093-120	071-0-094-190	071-0-101-310	071-0-102-400
071-0-093-130	071-0-094-200	071-0-101-320	071-0-102-410
071-0-093-140	071-0-094-210	071-0-101-330	071-0-102-420
071-0-093-150	071-0-094-220	071-0-101-340	071-0-102-430
071-0-093-160	071-0-094-240	071-0-101-350	071-0-102-440
071-0-093-170	071-0-094-250	071-0-101-370	071-0-102-450
071-0-093-180	071-0-094-260	071-0-101-380	071-0-102-465
071-0-093-190	071-0-094-270	071-0-101-390	071-0-102-475
071-0-093-200	071-0-094-280	071-0-101-400	071-0-102-485
071-0-093-210	071-0-094-290	071-0-101-410	071-0-102-495
071-0-093-220	071-0-094-300	071-0-101-420	071-0-102-505
071-0-093-230	071-0-094-310	071-0-102-010	071-0-102-515

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071-0-102-525	071-0-131-110	071-0-141-060	071-0-142-240
071-0-111-010	071-0-131-120	071-0-141-070	071-0-142-265
071-0-111-020	071-0-131-130	071-0-141-080	071-0-142-270
071-0-111-030	071-0-131-140	071-0-141-090	071-0-142-280
071-0-111-040	071-0-131-150	071-0-141-100	071-0-142-310
071-0-111-060	071-0-131-160	071-0-141-110	071-0-142-320
071-0-111-070	071-0-131-170	071-0-141-120	071-0-142-330
071-0-111-080	071-0-131-180	071-0-141-130	071-0-142-340
071-0-111-090	071-0-131-190	071-0-141-140	071-0-142-350
071-0-111-100	071-0-131-200	071-0-141-150	071-0-142-395
071-0-111-110	071-0-131-210	071-0-141-160	071-0-142-400
071-0-111-120	071-0-131-220	071-0-141-170	071-0-142-410
071-0-111-130	071-0-131-230	071-0-141-180	071-0-151-010
071-0-111-140	071-0-131-240	071-0-141-190	071-0-151-040
071-0-111-150	071-0-131-250	071-0-141-200	071-0-151-060
071-0-112-040	071-0-131-260	071-0-141-210	071-0-151-070
071-0-112-080	071-0-131-270	071-0-141-220	071-0-151-080
071-0-112-100	071-0-131-280	071-0-141-230	071-0-151-090
071-0-112-110	071-0-132-010	071-0-141-240	071-0-151-100
071-0-112-120	071-0-132-020	071-0-141-250	071-0-151-115
071-0-112-135	071-0-132-030	071-0-141-260	071-0-151-120
071-0-112-140	071-0-132-050	071-0-141-270	071-0-151-140
071-0-112-150	071-0-132-060	071-0-141-285	071-0-151-150
071-0-112-160	071-0-132-070	071-0-141-290	071-0-151-160
071-0-112-200	071-0-132-080	071-0-141-300	071-0-152-010
071-0-112-210	071-0-132-090	071-0-141-310	071-0-152-020
071-0-112-220	071-0-132-100	071-0-141-320	071-0-152-030
071-0-112-230	071-0-132-110	071-0-141-330	071-0-152-040
071-0-120-020	071-0-132-120	071-0-142-010	071-0-152-050
071-0-120-050	071-0-132-130	071-0-142-020	071-0-152-060
071-0-120-075	071-0-132-140	071-0-142-030	071-0-152-080
071-0-120-090	071-0-132-150	071-0-142-040	071-0-152-090
071-0-120-100	071-0-132-160	071-0-142-050	071-0-152-100
071-0-120-110	071-0-132-170	071-0-142-060	071-0-152-120
071-0-120-140	071-0-132-180	071-0-142-070	071-0-152-160
071-0-120-160	071-0-132-190	071-0-142-080	071-0-152-170
071-0-131-010	071-0-132-220	071-0-142-090	071-0-152-180
071-0-131-020	071-0-132-230	071-0-142-100	071-0-152-210
071-0-131-030	071-0-132-240	071-0-142-110	071-0-152-220
071-0-131-040	071-0-132-250	071-0-142-120	071-0-152-230
071-0-131-050	071-0-132-260	071-0-142-130	071-0-152-240
071-0-131-060	071-0-141-010	071-0-142-140	071-0-152-255
071-0-131-070	071-0-141-020	071-0-142-190	071-0-152-260
071-0-131-080	071-0-141-030	071-0-142-200	071-0-152-280
071-0-131-090	071-0-141-040	071-0-142-220	071-0-152-290
071-0-131-100	071-0-141-050	071-0-142-230	071-0-152-300

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071-0-152-320	071-0-160-180	071-0-180-230	071-0-201-040
071-0-152-330	071-0-160-200	071-0-180-240	071-0-201-050
071-0-152-340	071-0-160-210	071-0-180-250	071-0-201-060
071-0-152-350	071-0-160-220	071-0-180-260	071-0-201-070
071-0-152-360	071-0-171-090	071-0-180-270	071-0-201-080
071-0-153-010	071-0-171-100	071-0-180-280	071-0-201-130
071-0-153-040	071-0-171-110	071-0-180-290	071-0-201-140
071-0-154-010	071-0-171-120	071-0-180-300	071-0-201-150
071-0-154-020	071-0-172-030	071-0-180-310	071-0-201-160
071-0-154-030	071-0-172-075	071-0-180-320	071-0-201-180
071-0-154-040	071-0-172-085	071-0-180-330	071-0-201-210
071-0-154-050	071-0-173-020	071-0-180-340	071-0-201-220
071-0-154-060	071-0-173-030	071-0-180-350	071-0-201-230
071-0-154-070	071-0-173-040	071-0-180-360	071-0-201-240
071-0-154-080	071-0-174-060	071-0-180-370	071-0-201-250
071-0-154-090	071-0-174-070	071-0-180-400	071-0-202-040
071-0-154-100	071-0-174-140	071-0-180-410	071-0-202-050
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Parcels

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Parcels

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Parcels

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Parcels

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Parcels

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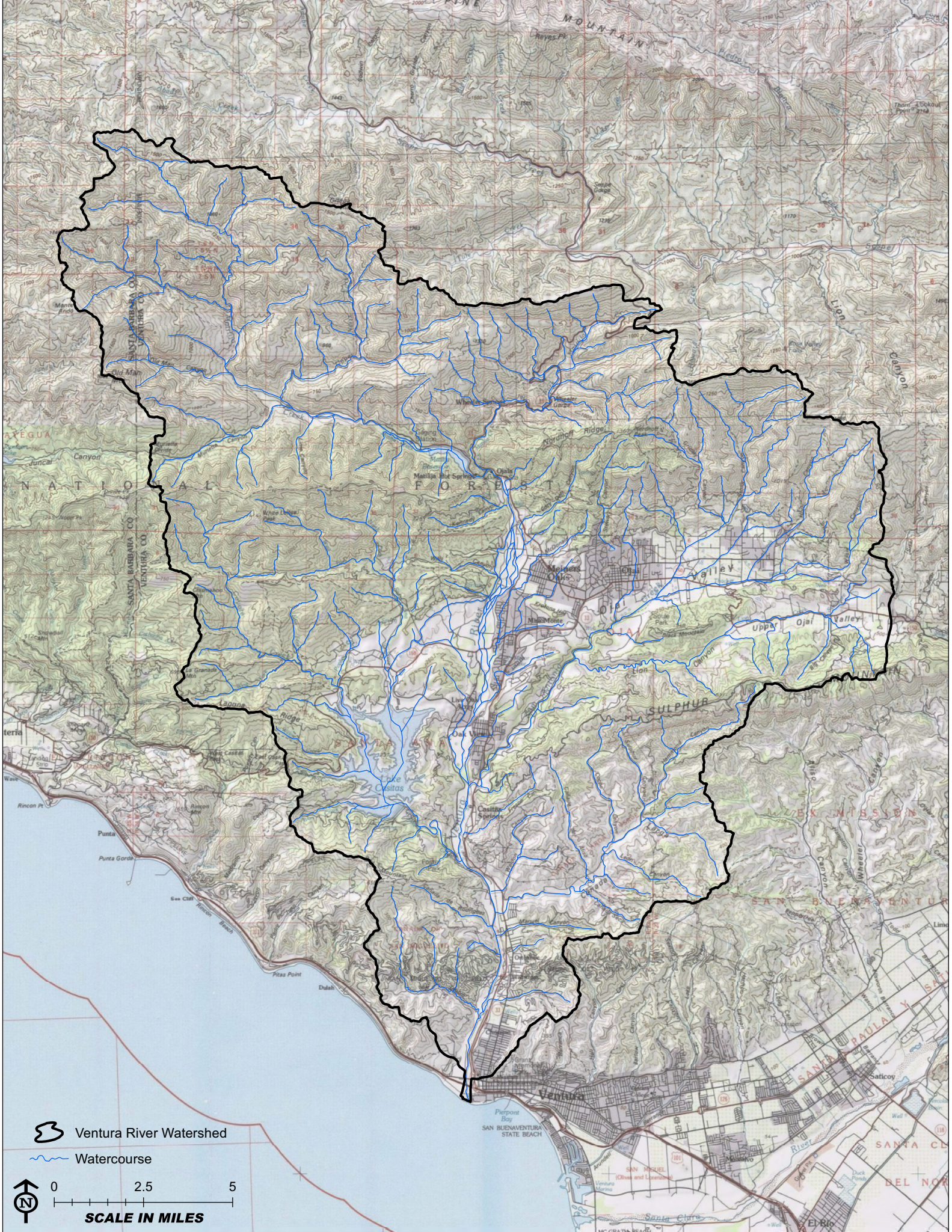
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Exhibit D – List of Defaulted Cross-Defendants –
To be Completed with Court Confirmation


Exhibit D

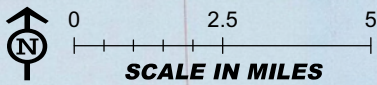
Exhibit E – Watershed and Basin Maps

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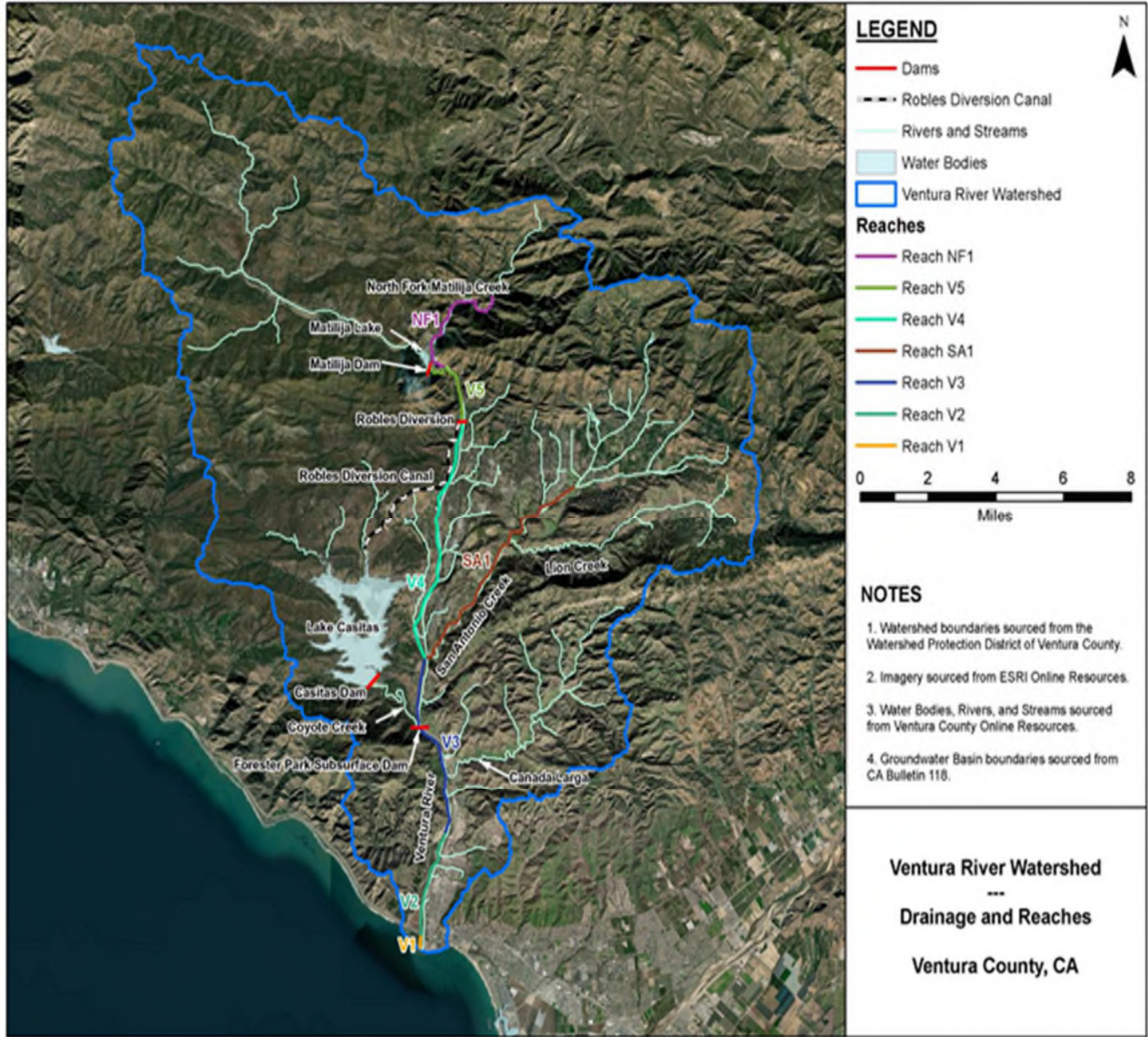


 Ventura River Watershed

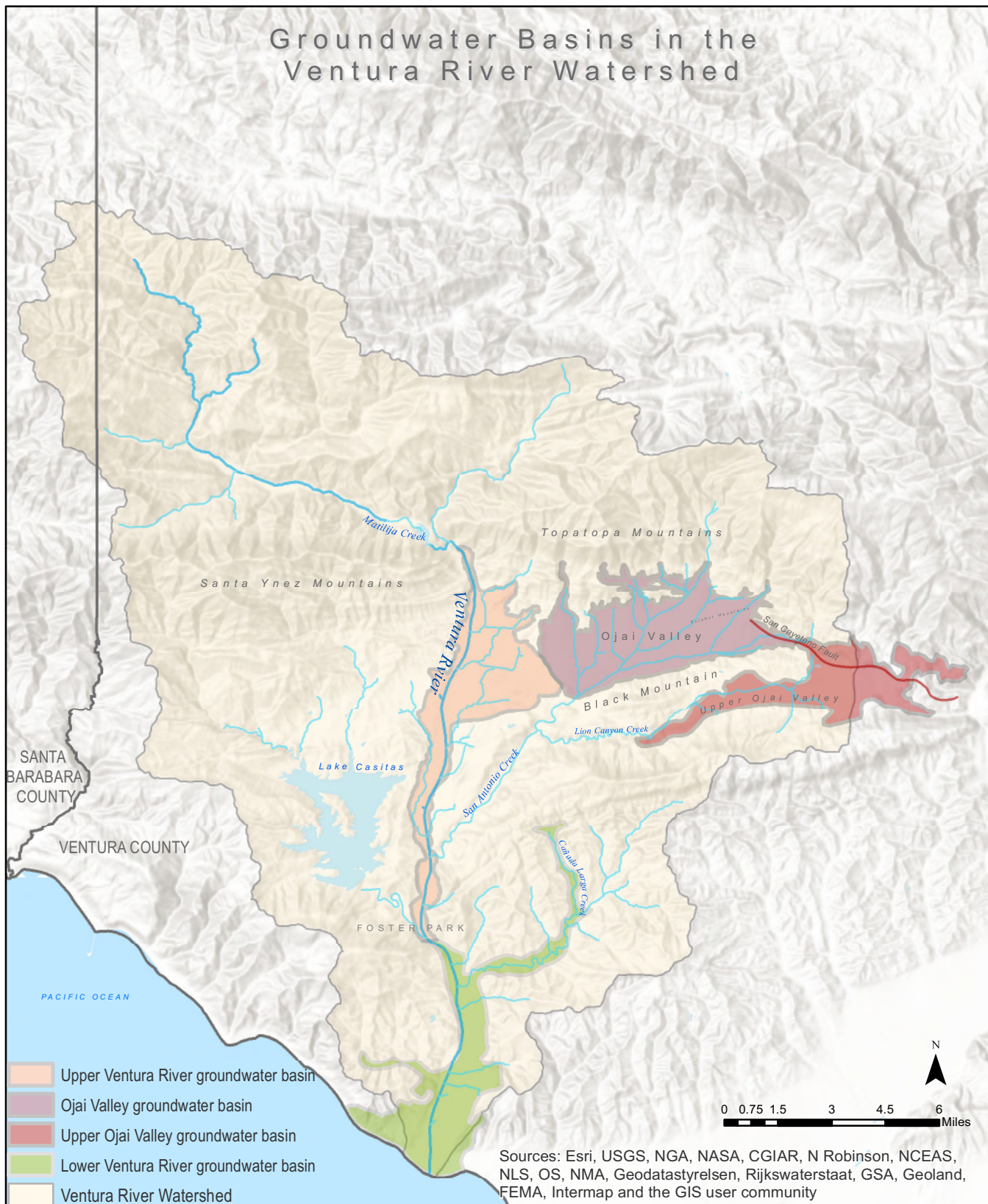
 Watercourse



Ventura River Reaches Map

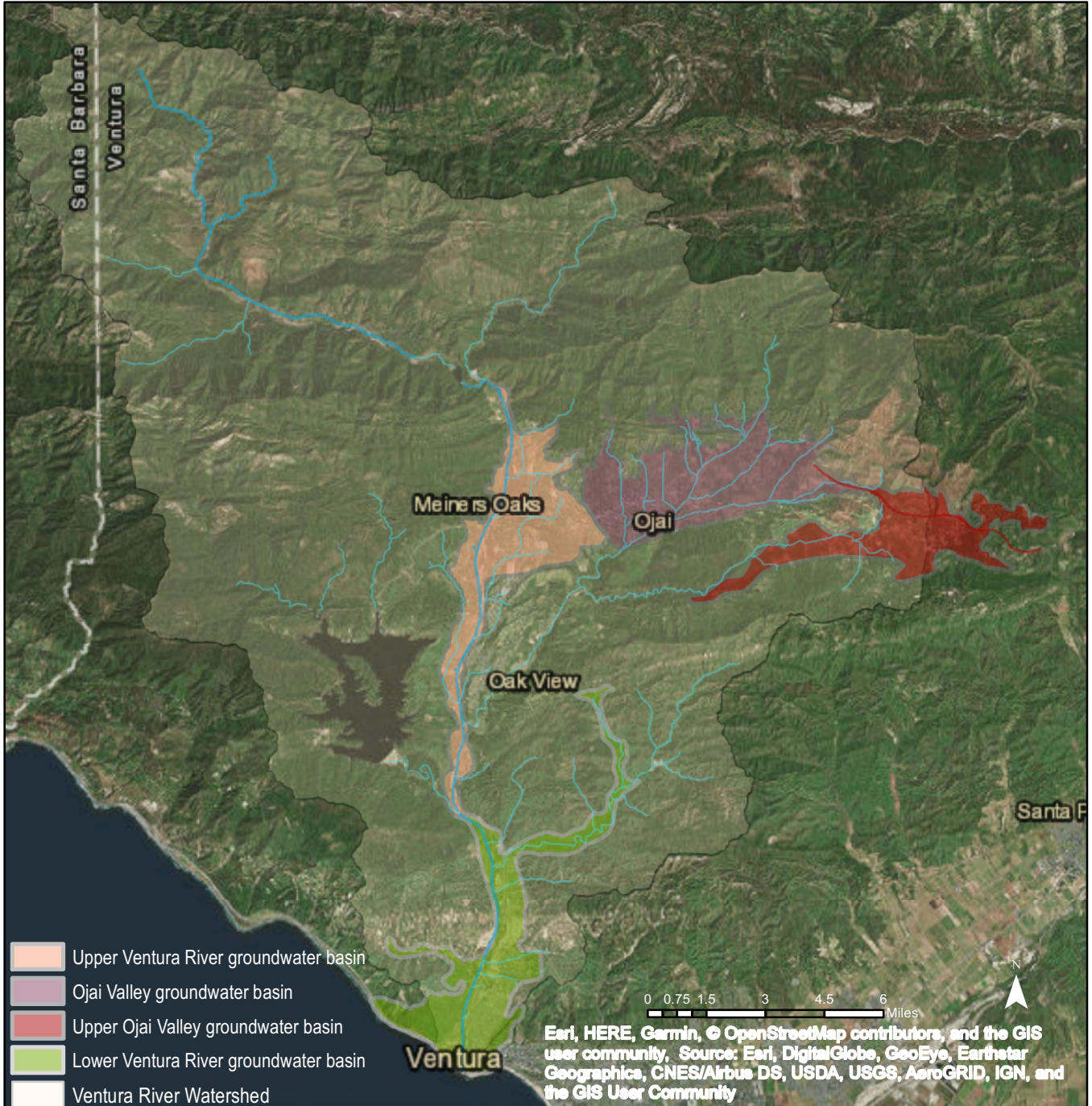


Groundwater Basins in the Ventura River Watershed

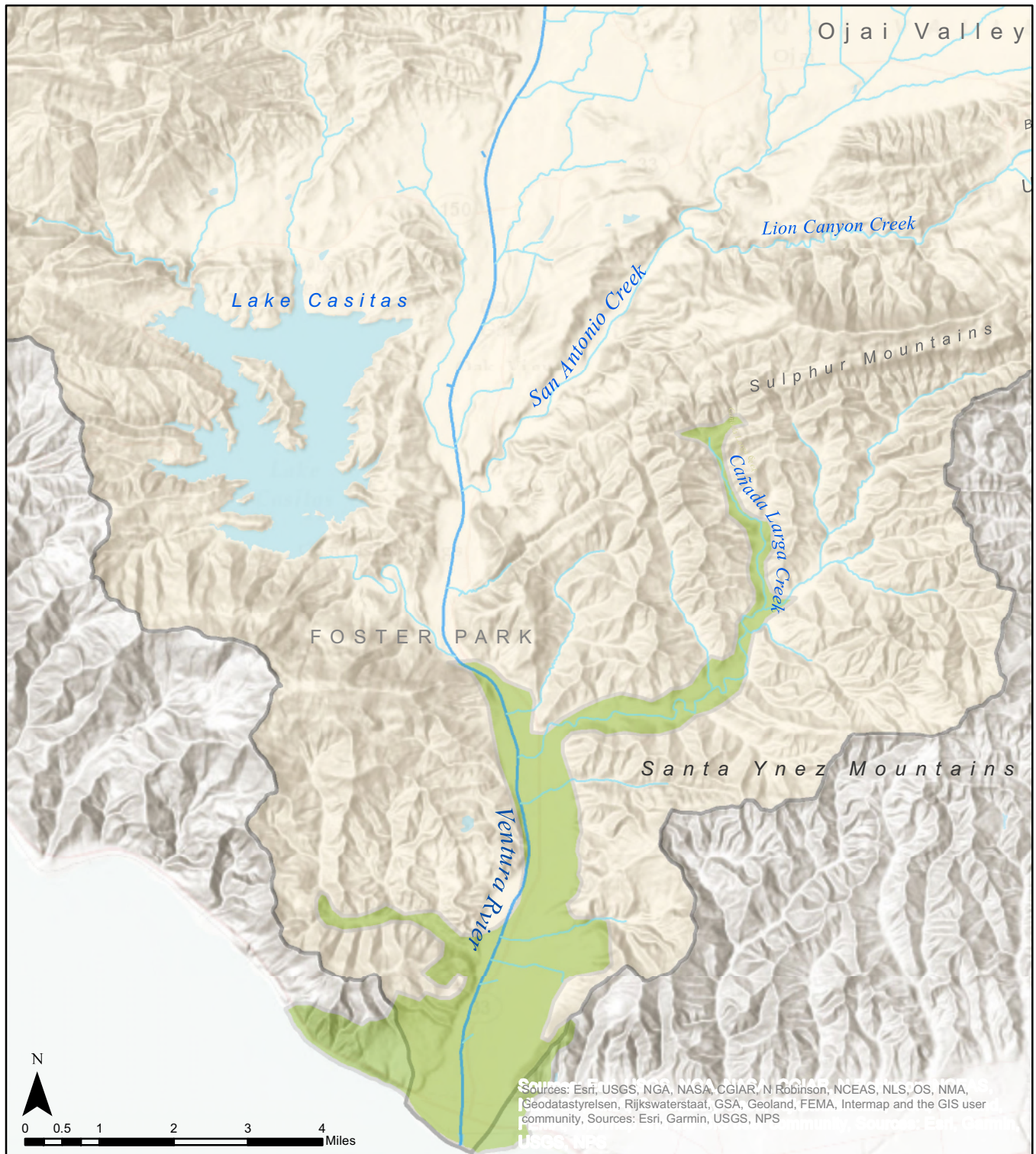


Sources: Esri, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NMA, Geodatastyrelsen, Rijkswaterstaat, GSA, Geoland, FEMA, Intermap and the GIS user community



Groundwater Basins in the Ventura River Watershed



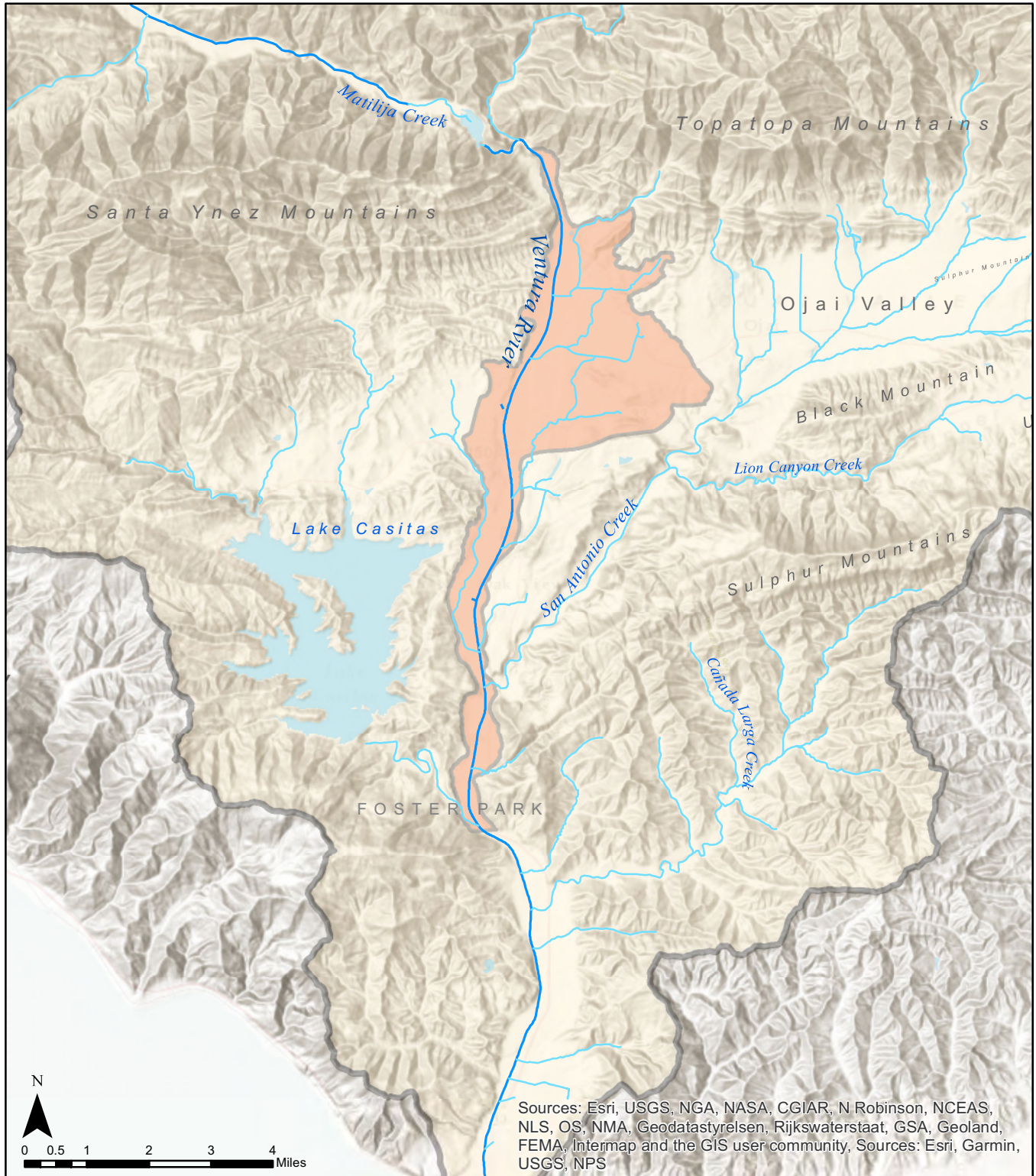
Lower Ventura River Groundwater Basin



Sources: Esri, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NMA, Geodatastyrelsen, Rijkswaterstaat, GSA, Geoland, FEMA, Intermap and the GIS user community. Sources: Esri, Garmin, USGS, NPS

-  Lower Ventura River groundwater basin extent
-  Ventura River Watershed

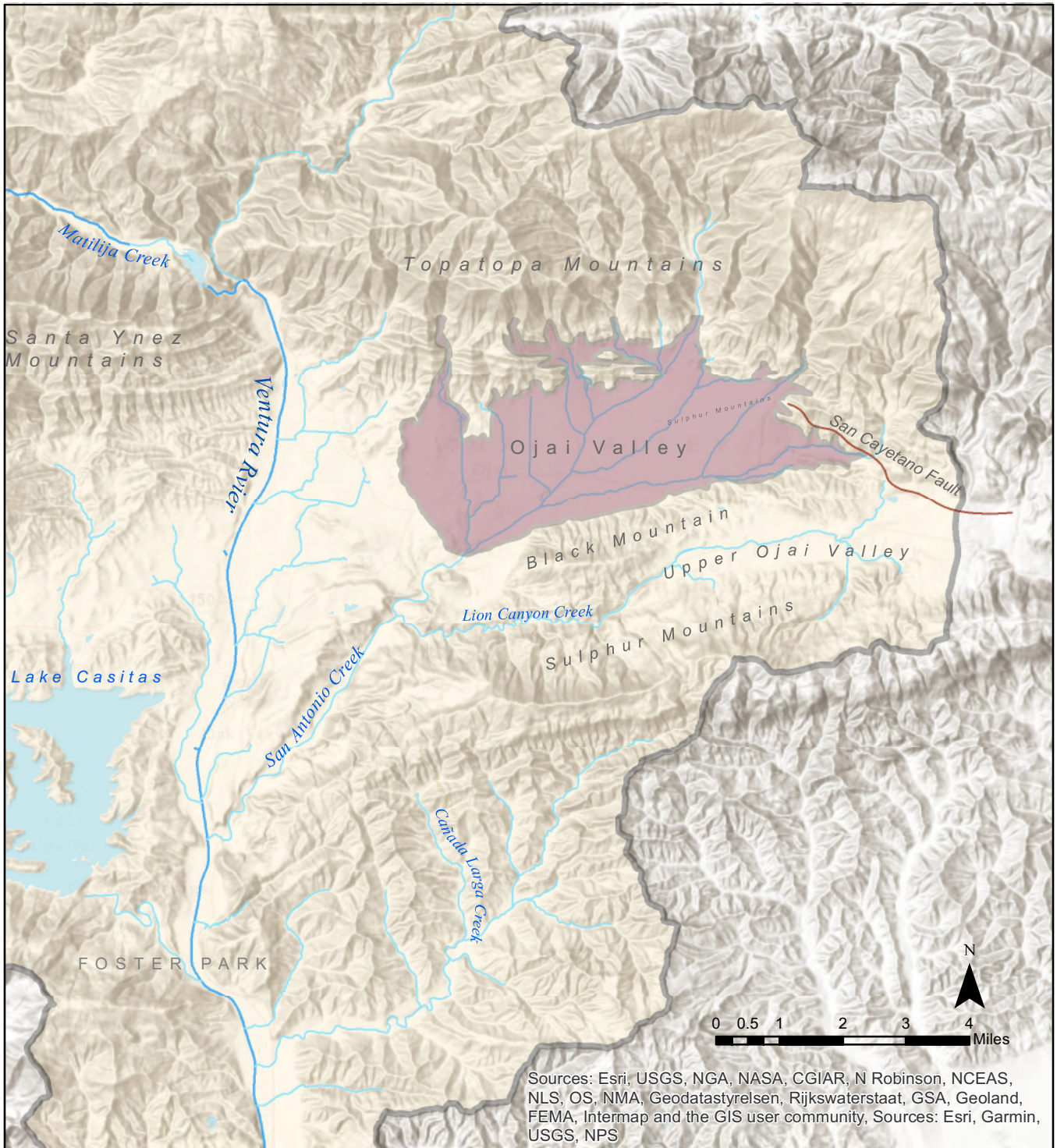
Upper Ventura River Groundwater Basin





Sources: Esri, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NMA, Geodatastyrelsen, Rijkswaterstaat, GSA, Geoland, FEMA, Intermap and the GIS user community, Sources: Esri, Garmin, USGS, NPS

- Ventura River Watershed
- Upper Ventura River groundwater basin extent

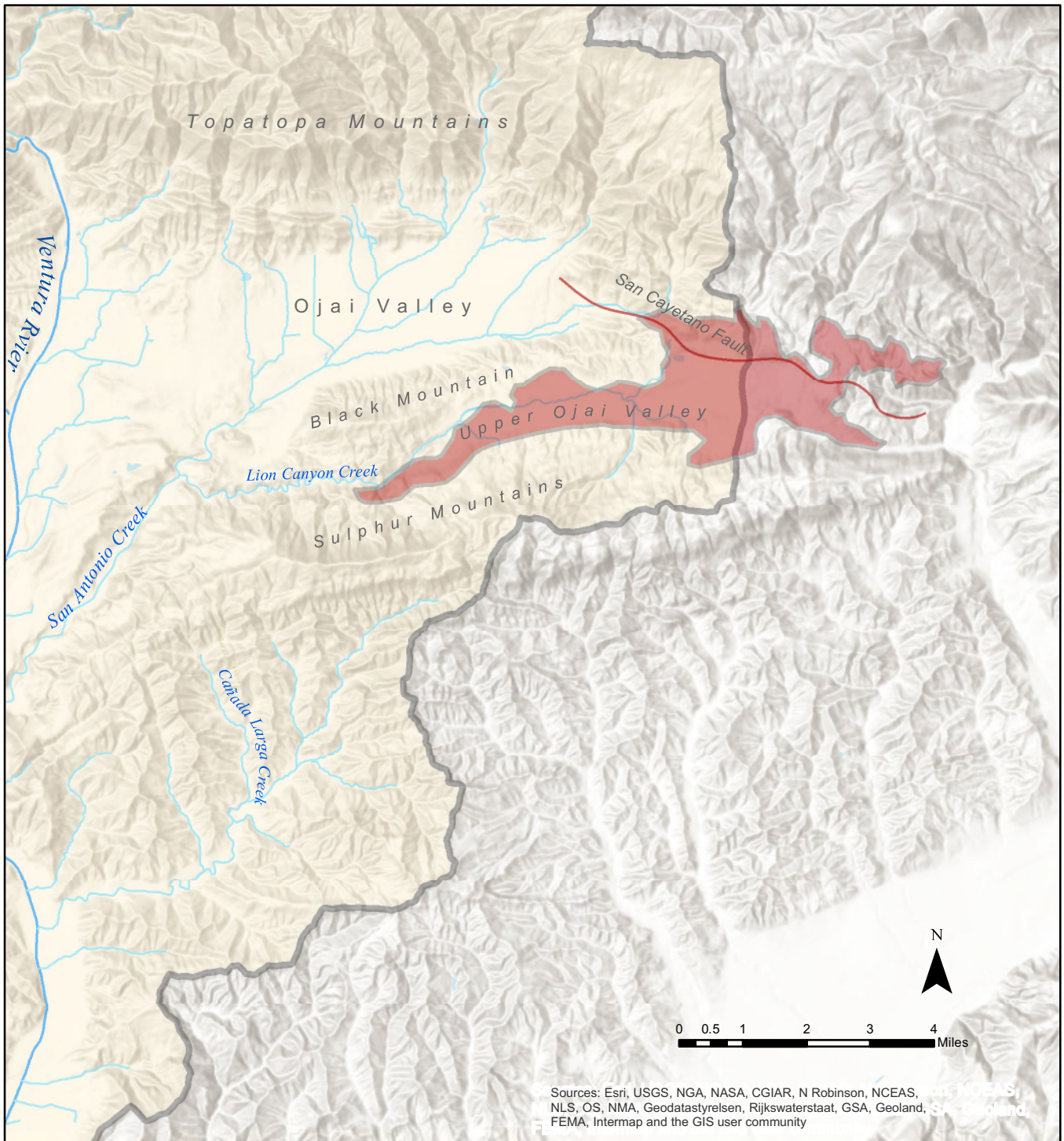
Ojai Valley Groundwater Basin



-  Ventura River Watershed
-  Ojai Valley groundwater basin extent

Sources: Esri, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NMA, Geodatastyrelsen, Rijkswaterstaat, GSA, Geoland, FEMA, Intermap and the GIS user community, Sources: Esri, Garmin, USGS, NPS

Upper Ojai Valley Groundwater Basin



- Upper Ojai Valley Basin
- Ventura River Watershed

Exhibit F – Production Forbearance Program

1. Eligibility. Any Producer is eligible to enroll in the Court-approved and MC-developed and administered Production Forbearance Program as set forth herein.
2. Methods. Any Producer may reduce their Production under methods developed pursuant to this Court approved Production Forbearance Program or otherwise approved by the MC after making a finding that the Production reduction is in compliance with the goals and objectives of the Production Forbearance Program and the Physical Solution.
3. Term. A Producer may enroll in the Production Forbearance Program permanently or temporarily, (for periods not less than one year) and thereby agrees to voluntarily reduce Production by an amount the Producer determines in its sole discretion (“Enrollment Period”). An Enrollment Period may be antedated to no earlier than January 2, 2020, so long as the MC makes a finding that the Production reduction measure undertaken prior to the entry of this Stipulated Physical Solution and Judgment reasonably satisfied the MC’s requirements under sections 2 and 4.
4. Administration of the Production Forbearance Program. The MC shall develop procedures to administer the Production Forbearance Program, including: the creation of simple enrollment forms (an example is provided at the end of this exhibit); notice of enrollment; identification of the methodology employed; basic verification methods to demonstrate reduced Production; monitoring; and termination of enrollment. The MC shall approve a Producer’s application for enrollment so long as the Producer fulfills the enrollment’s procedural requirements.
5. No Verification of Streamflow Enhancement Required. No enrolled Producer will be required to demonstrate a quantifiable streamflow enhancement resulting from reduced Production. However, enrolled Producers must verify reduced Production using the methods approved by the MC
6. Future Required Demand Management. The Physical Solution contemplates potential mandatory demand management measures that the MC and/or the Court may impose to meet the objectives of the Physical Solution. When setting a Producer’s base Production amount for that purpose, if such a setting is ever required, the base period shall not include Enrollment Period(s). If base Production or future allocations are quantified by another method, past and ongoing conservation measures shall be equitably tailored to account for an enrolled Producer’s voluntary efforts pursuant to the Production Forbearance Program.
7. Future Water Rights Determination. In any future water rights determination, any base or historical period used to quantify a temporarily enrolled Producer’s water right shall not include Enrollment Period(s). Reduced Production during an Enrollment Period shall not be evidence of abandonment, forfeiture, or failure to engage in self-help.

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8. Statutory Water Conservation Provisions. The Court finds reduced Production pursuant to an appropriative right under the Production Forbearance Program qualifies the Producer for the protections set forth in Water Code section 1011.
9. No Other Approvals Necessary. No other state agency or Court approval is required to afford an enrolled Producer in the benefits and protections provided by the Production Forbearance Program.

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Exhibit F – Production Forbearance Program – Temporary Enrollment Form

Date:

Name:

Place of Use (APN #s, Address):

Method of Production:

Statement of Diversion and Use # or Permit or License #, if applicable:

Well name, State Well Number, and Recordation Number, if applicable:

Previous Five-Year Production Average:

Description of Proposed Water Conservation Measures:

Estimated Amount of Water Forborne:

Anticipated Term of Enrollment:

Signature:

Exhibit G – Monitoring and Reporting Program

1. Hydrology Monitoring Program

a. Water Quality Monitoring

The purpose of the water quality monitoring program is to characterize water chemistry and temperature conditions relevant to assessing habitat suitability and the health of the Fishery. Monitoring includes measurement of both air and water temperature, conductivity (as a measure of salinity), and where relevant, dissolved oxygen at or near locations where either sensitive habitat exists or where habitat enhancement projects associated with the Physical Solution are being implemented.

i. Water Temperature

Water temperature is a primary habitat consideration for the successful over-summering and rearing of juvenile *O. mykiss*. Water temperature in the watershed is known to vary with season, streamflow, pool depth, shade cover, ambient air temperature, variations in solar radiation (cloudiness), and inputs by both surface water and groundwater. Instrumentation for monitoring water temperatures is readily available either as standalone programmable temperature recorders (e.g., Onset temperature data loggers) or as multiparameter data sondes to measure water temperature, electrical conductivity, and other water quality parameters. This instrumentation would be deployed to monitor conditions in the mainstem and appropriate portions of the tributaries from March through November, when stream flows are typically low and do not threaten loss of equipment. Units will be accessed for performance checks and data downloads on a periodic basis, typically monthly or quarterly. All instrumentation will be tested for accuracy annually before deployment, as recommended by manufacturer specifications, and recalibrated as needed.

ii. Dissolved Oxygen

Dissolved oxygen (DO) is a critical measure of the suitability of surface waters for fish habitat. Dissolved oxygen data can be acquired on a continuing basis via instrumentation and maintained on submersible datalogger units for periodic download. An additional component of the monitoring program will be to collect dissolved oxygen data in areas identified as critical

1 spawning/rearing and refuge habitat. This data will be collected by portable recording DO unit
2 and downloaded on a monthly basis. This instrumentation will be deployed from late March
3 through November when flows are lower and will be accessed for performance checks and data
4 downloads on a periodic basis, typically weekly or monthly.

5 Handheld portable multiparameter water quality monitoring units are available for use in
6 making instantaneous water quality measurements (grab sample measurements) associated with
7 snorkel surveys and other fishery and habitat monitoring efforts. These multiple parameter units
8 typically include sensors such as temperature, pH, and electrical conductivity. All
9 instrumentation will be tested for accuracy annually before deployment, as recommended by
10 manufacturer specifications, and recalibrated as needed.

11 *iii. Additional Water Quality Parameters*

12 In addition to the field-measured water quality parameters, the physical solution
13 monitoring program recommends that additional water quality samples be collected for laboratory
14 analysis on a semi-annual basis and compared on an inter- and intra-station basis. This will allow
15 a measure of water quality and an assessment of water types that may be present at different
16 locations along the course of the river. The tested parameters will include cations (Ca, Mg, Mn,
17 K), anions (CO₃, HCO₃, SO₄, NO₃), Fe, and Mn.

18 If other deleterious surface water quality conditions are observed or suspected, additional
19 sampling for pollutants or chemicals of concern (COCs) can be performed in conjunction with
20 periodic monitoring events or on an as needed basis. Typical COCs that might occur in the
21 watershed would be those associated with urban and agricultural runoff such as nitrates, high
22 TDS, salts, volatile and semi-volatile organic compounds, coliform bacteria, and metals. Since
23 there are a number of entities that already evaluate surface water quality conditions in the
24 watershed, efforts to perform additional water quality analyses will be integrated with other
25 programs in order to minimize duplication of effort and maximize the collection of data relevant
26 to project needs.

1 *iv. Flow Monitoring*

2 The instream flow monitoring will be divided into two portions. A regional monitoring
3 effort will involve downloading data from active USGS, City of Ventura, Casitas MWD, or other
4 public entity gages to evaluate the larger scale flows in the watershed. Currently, there are three
5 gages on the mainstem that monitor and report average daily flows: USGS gage at Foster Park in
6 Reach V3 (USGS gage 11118500), and the City of Ventura Water's gages at and above Foster
7 Park. There are four active gages on Ventura River tributaries that record daily flows and are
8 operated by the VCWPD: gage 605A on San Antonio Creek, gage 603A on Matilija Creek, gage
9 616 on San Antonio Creek at Camp Comfort, and gage 604 on North Fork Matilija Creek.
10 Although USGS and VCWPD data is collected automatically on a 15-minute delay basis and is
11 available on the World Wide Web, the instantaneous and daily data are considered preliminary
12 for extended periods of time after collection. Rating curves are updated on an ongoing basis, so
13 values are subject to change and the final approved data are typically not available for three to
14 four months after collection. Once final data are acquired, they will be reviewed for
15 completeness and the flow data will be aggregated on a monthly and annual basis.

16 In addition to the regional in-stream flow monitoring, a site-specific in-stream flow
17 monitoring program is proposed for areas where critical habitat elements are located and/or at
18 locations where physical solution programs with flow components are proposed or implemented.
19 The intent of these gages is to provide detailed site-specific streamflow data during lower flow
20 seasons and to characterize flows at or near locations of implemented habitat enhancement
21 actions. The site-specific program will involve establishing a gaging station early in each post-
22 storm season, ideally one in each reach where conditions permit. These stations will allow for the
23 collection of continuous water level and water temperature data from a removable stilling well
24 installed in the river channel outfitted with a recording pressure transducer.

25 Once installed, transect surveys will be performed perpendicular to the river to collect
26 surface-water velocity and water depth data that will be used to develop a rating curve. Using
27 this rating curve, discharge values can be calculated for any period of time that depth data was
28 recorded by the transducers. The transducers will be programmed to collect depth and

1 temperature data on an hourly basis with data downloaded monthly. Supplemental depth and
2 velocity surveys to update the rating curve would also be conducted on a monthly basis.

3 Each season will typically conclude in late fall or while dry and low flow conditions
4 persist. At the conclusion of each season, the data will be tabulated and classified and compared
5 to the seasonal biological observations.

6 *v. Surface water groundwater monitoring*

7 A detailed sub-River data collection program is recommended in areas where surface
8 water-groundwater interaction is suspected and where such interaction is critical to habitat
9 maintenance. These monitoring stations will include a small-diameter steel pipe placed through
10 the riverbed equipped with a recording water level and temperature transducer. A stilling well
11 will also be installed in close proximity equipped with a water level/temperature transducer to
12 collect surface water levels and temperatures. The depth to water measurements will be
13 referenced to fixed survey points to calculate water level elevations to compare groundwater
14 elevations to surface water elevations. Surface water and groundwater temperatures will also be
15 compared. Trend comparison studies that include concurrent pumping by local wells will also be
16 performed to determine whether surface water and groundwater levels respond to natural diurnal
17 changes, precipitation and climatic conditions, well pumping, and/or diversion.

18 19 **2. Fish Monitoring Program**

20 **a. Core Fishery Monitoring**

21 The Ventura River *O. mykiss* monitoring program has been developed to document habitat
22 conditions, abundance, lifestages and fish condition, and distribution of Southern California *O.*
23 *mykiss* in the mainstem Ventura River below Matilija Dam, North Fork Matilija Creek, and San
24 Antonio Creek. The primary objective of the monitoring program is to develop technical
25 information on the *O. mykiss* population and habitat in the lower Ventura River watershed for use
26 in managing habitat conditions and evaluating the performance of management actions for the
27 benefit of *O. mykiss*. The purposes of the monitoring program are to:

- 1 • Detect and evaluate the effects of implementing the proposed Physical Solution and
2 document other factors that may affect the *O. mykiss* population;
- 3 • Determine the effectiveness and benefits to *O. mykiss* of the instream flows, passage
4 impediment improvements, and other restoration/conservation actions described in the
5 proposed Physical Solution; and
- 6 • Assess trends in the health and condition of individual *O. mykiss*, the *O.*
7 *mykiss* population, and the community of fish inhabiting the watershed.

8 To accomplish these objectives, a multifaceted monitoring program has been developed
9 that includes biologically based monitoring of the status and trends in juvenile *O.*
10 *mykiss* abundance, distribution, survival, and adult returns that were designed and implemented
11 for 6 years of fish monitoring by Allen (2015). In addition, the protocols follow those identified
12 and described in several California Department of Fish and Wildlife documents,
13 including *California Salmonid Stream Habitat Restoration Manual* (Flosi et al. 2002; 2010
14 updated Fourth Edition), and as later reflected in CDFW *California Fish Bulletin 180, California*
15 *Coastal Salmonid Population Monitoring: Strategy, Design and Methods* (Adams et al.
16 2011). Population metrics, such as smolt-to-adult survival and cohort replacement rates, can also
17 be quantified based on results of the proposed Passive Integrated Transponder (PIT) tag
18 monitoring element. Since each biological monitoring method has strengths and weaknesses, a
19 variety of monitoring techniques has been proposed, ranging from electrofishing to seasonal
20 snorkel surveys to PIT-tag mark-recapture studies. The monitoring plan also includes
21 consideration of factors that affect *O. mykiss* production and survival, including monitoring
22 changes in habitat conditions, instream flow, water quality (with the primary focus on water
23 temperature as a limiting factor), and lagoon and estuary breaching, which affects both juvenile
24 and adult *O. mykiss* migration opportunities.

25 Surveys of fishery resources will include snorkel surveys, electrofishing, PIT tagging and
26 lifecycle monitoring, and *O. mykiss* genetics assessment.

1 *i. Spring and Fall Snorkel Surveys*

2 Spring and fall snorkel surveys were selected as the preferred monitoring method in an
3 effort to reduce the risk of incidental take of *O. mykiss*. However, in the event that instream flows
4 are too low to allow snorkel surveys, sampling will be conducted using a backpack electro-
5 shocker and block nets in accordance with CDFW and NMFS protocols. Snorkel surveys will be
6 used to:

- 7
- 8 • Characterize the size and geographic distribution of juvenile and adult *O. mykiss*;
 - 9 • Develop estimates of juvenile production (number of juveniles per spawning adult),
10 density (number of juveniles per 100 square meters [m²]) for each reach surveyed, and an
11 index of *O. mykiss* abundance for each study reach;
 - 12 • Annually monitor the geographic distribution, genetic characteristics, health and
13 condition, and size classes of *O. mykiss* in the North Fork Matilija and San Antonio
14 Creeks and the mainstem;
 - 15 • Assess changes in juvenile abundance and distribution between the spring and fall (a
16 rough estimate of reproductive success and over-summering survival) and changes in size
17 distribution (a rough estimate of juvenile growth); and
 - 18 • Annually monitor the species compositions, abundance, geographic distribution, and size
19 classes of native and non-native fish observed in the snorkel surveys in the tributaries and
20 the mainstem Ventura River.

21 Snorkeling (direct observation) is an effective monitoring method when depths are
22 sufficient for divers to efficiently navigate through the entire sampling unit (e.g., pools and most
23 flatwater habitat). However, snorkeling is not effective in shallow depths, as is the
24 case for riffle habitat. In that case, electrofishing can be highly effective to generate abundance
25 estimates. For this program, sampling by direct observation is the preferred methodology.
26 Sampling will generally progress from downstream study sites to upstream sites with the majority
27 of surveys occurring during the low-flow period in early-summer and again in the fall.

28 Snorkel surveys will be conducted in portions of the lower watershed that are legally
accessible and have the potential to contain *O. mykiss*. We propose that two snorkeling surveys

1 per year be conducted, with one survey during the spring (May–June) to assess over-wintering
2 success and the second survey during the fall (October–November) to assess over-summering
3 success. Survey reaches will be consistent with the locations and protocol of Allen (2015).

4 The species composition, abundance, geographic distribution, and size classes of *O.*
5 *mykiss* and all other fish species (e.g., Centrarchids, Ictalurids, stickleback, etc.) observed will be
6 recorded. The biannual surveys are expected to take approximately two weeks to complete.
7 Surveys will be conducted in designated survey reaches where access is permitted and will
8 include pool, riffle, and run habitats. Riffle habitats will be sampled using electrofishing
9 methodology since they are too shallow to allow effective snorkel surveys. Additional snorkel
10 surveys may be performed prior to, and after, completion of fish passage and habitat enhancement
11 projects to provide data for evaluation of site-specific habitat enhancement project performance.

12 In the case of electrofishing, a standard three-pass depletion survey design will be used to
13 estimate the abundance and 95 percent confidence intervals at each location (habitat unit) as well
14 as *O. mykiss* density (e.g., catch per unit effort [CPUE] reflected by *O. mykiss* per 100 m²).

15 CPUE can be calculated based on fish density and standardized by sampling effort (i.e.,
16 snorkel time and habitat unit area) with corresponding confidence intervals (Hankin and Reeves
17 1988). Results will be used to test for statistically significant differences and trends in the
18 abundance and density of *O. mykiss* and other fishes in response to implementation of site-
19 specific habitat enhancement actions, in response to variation in hydrologic conditions within and
20 among years, and in the various study reaches. Observations of individual *O. mykiss* showing
21 external signs of disease (e.g., blackspot disease), deformities, or other abnormalities) will be
22 recorded. Results of these surveys will be used to evaluate year class abundance and the status of
23 the population in achieving metrics of good condition.

24 ***ii. PIT Tagging/Lifecycle Monitoring***

25 Limited electrofishing collections and associated Passive Integrated Transponder (PIT)
26 tagging will be used to:

- 27 • Characterize the size distribution (length frequency) of juvenile and adult *O. mykiss*;

28

- 1 • Determine *O. mykiss* smolt and returning adult migration rates and seasonal migration
2 timing;
- 3 • Develop estimates of juvenile *O. mykiss* production (number of juveniles per spawning
4 adult);
- 5 • Collect *O. mykiss* tissue samples and have them processed by a qualified genetic testing
6 laboratory to monitor genetic structure, diversity, and anadromy (e.g., Omy5
7 allele; Leitwein et al. 2017) and support the development of the California genetics
8 database developed and held by NMFS;
- 9 • Capture wild *O. mykiss* for installation of PIT tags and PIT tag detections;
- 10 • Develop annual estimates of cohort replacement rate based on results of adult *O.*
11 *mykiss* escapement; and
- 12 • Develop estimates of *O. mykiss* adult straying within the lower watershed based on PIT
13 tag detection at mainstem and tributary sampling sites.

14 Backpack electrofishing following standard CDFW and NMFS protocols will be
15 conducted during the fall at sites in the mainstem river (e.g., San Antonio Creek confluence to
16 Foster Park), San Antonio Creek, and North Folk Matilija Creek as part of the population surveys
17 and to collect *O. mykiss* for PIT tagging. PIT tags are each unique and identify individual fish
18 whenever the tag is detected in the future. The date, time, length, weight, individual tag number,
19 and location of capture and release will be recorded. Fish will be measured to the nearest
20 millimeter (fork length [FL]); scales and a small tissue clip will be removed from the upper lobe
21 of the caudal fin from all *O. mykiss*. Scales will be processed for aging. Fin clips will be
22 preserved in 95 percent ethanol and sent to the NMFS Southwest Fisheries Science Center or
23 other qualified laboratory for genetic analysis. In the event of an *O. mykiss* mortality, the fish will
24 be preserved in 95 percent ethanol for further processing. Otoliths from mortalities will be
25 dissected for age and growth assessment and analyzed. Reproductive condition and sex will be
26 determined by visual inspection for adult *O. mykiss*. All mortalities will be reported to CDFW and
27 NMFS as part of incidental take.

28

1 PIT tags will be inserted into *O. mykiss* at least 100 millimeters (mm) (FL) captured in the
2 electrofishing. Fish will be released directly into the stream to continue migration in the direction
3 of travel in which they were captured.

4 *iii. Lifecycle Monitoring (PIT Tagging)*

5 PIT tagging will be used to:

- 6 • Determine *O. mykiss* smolt and returning adult migration rates and correlations with
7 environmental covariates;
- 8 • Estimate juvenile *O. mykiss* survival;
- 9 • Detect and individually identify juvenile and adult *O. mykiss*;
- 10 • Identify the source of juvenile *O. mykiss* that survive to return as adults (e.g., mainstem
11 river, North Fork Matilija Creek, etc.);
- 12 • Characterize the migration timing, abundance of returning adult *O. mykiss*, and their age
13 distribution using non-lethal monitoring methods;
- 14 • Use multiple tag detection arrays to develop general estimates of reach-specific *O.*
15 *mykiss* outmigrant survival rates and determine key reaches in the mainstem and
16 tributaries where migration is impeded and locations where the risk of predation mortality
17 is increased (predator hot spots) based on results of reach-specific survival estimates; and
- 18 • Estimate smolt to adult ocean survival from returning adult *O. mykiss*.

19 To reduce handling stress, fish will not be tagged when water temperature is above 18 C
20 or the fish have been stressed by other factors such as excessive handling. Because larger PIT tags
21 tend to have greater detection ranges, the largest PIT tags that do not affect juvenile *O.*
22 *mykiss* survival will be used. The 100 mm (FL) size threshold will be used based on results of PIT
23 tag size and fish size tagging studies, which suggest little to no effects of 23 mm PIT tags injected
24 into salmonids 100 mm (FL) or greater in length (Zydlewski et al. 2003; Bateman and Gresswell
25 2006; Bond et al. 2007). *O. mykiss* less than 250 mm (FL) will be tagged in the body cavity (just
26 off the ventral midline and posterior to the pectoral fin) and fish greater than 250 mm will be
27 tagged using the inter-muscle method either in the pelvic or dorsal region.

28

1 PIT tagging will follow PTAGIS (2014) protocol, created for salmonid monitoring in the
2 Columbia Basin, and BioMark fish tagging methods, and may be revised as needed. PIT tags have
3 been used extensively for salmonid studies on the Columbia River and elsewhere in the Pacific
4 Northwest.

5 PIT tag detection has the advantage of being non-lethal and does not require capture or
6 handling of the fish. PIT tag detector arrays will be placed lower North Fork Matilija Creek and
7 San Antonio Creek and two arrays (for redundancy and to estimate tag detection probability) will
8 be positioned in the mainstem river upstream of the lagoon and estuary. There is also a potential
9 to position a PIT detector in the Robles fish ladder. Detector arrays will be operated continuously
10 throughout the November through June migration monitoring period. Arrays are capable of being
11 kept in place at higher flows and may be successful in documenting migration during and
12 following storm events. However, at extremely elevated flows, arrays will need to be removed
13 from the river to minimize equipment damage and/or loss.

14 *iv. O. mykiss Genetics*

15 A tissue sample, typically a small piece of the caudal fin, will be taken for all *O.*
16 *mykiss* collected by electrofishing (or a subsample in the event that more than 50 *O. mykiss* are
17 collected at a single location). Tissue samples will be labeled and preserved in 95 percent ethanol.
18 Tissue samples will be provided periodically to the NMFS Southwest Fishery Science Center or
19 other qualified genetics laboratory for genetic analysis.

20 **3. Performance Assessment Monitoring for Restoration/ Enhancement Features**

21 Performance monitoring will be conducted in San Antonio Creek, North Fork Matilija
22 Creek, and the mainstem Ventura River wherever habitat enhancement features are installed. In
23 general, supplemental monitoring will be conducted using snorkel surveys for fish distribution
24 and abundance, and habitat mapping, visual survey, photo-documentation, and GPS methods for
25 restoration/enhancement feature installations and gravel augmentation programs, all of which will
26 be assessed through adaptive management techniques. Performance assessment will also include
27 habitat suitability metrics such as water depth, velocity, substrate, cover, passage criteria at
28 impediments, and water quality. Comparisons will be made of the *O. mykiss* densities within an

1 enhanced habitat area and adjacent areas where enhancement has not been made to assess habitat
2 utilization.

3 **4. Supplemental Habitat Monitoring Program**

4 Supplemental Habitat monitoring will be considered in order to:

- 5 • Periodically (5-year interval) conduct habitat inventories within North Fork Matilija
6 Creek, San Antonio Creek, and the mainstem river to characterize changes in river and
7 tributary conditions; and
- 8 • Synthesize data on daily flows and hourly water temperatures (collected as part of the
9 hydrologic monitoring program) within North Fork Matilija Creek, San Antonio Creek,
10 and the mainstem river for use in environmental analyses of wild *O. mykiss* production,
11 survival, and migration rates.

12 **a. Habitat Conditions**

13 Habitat suitability of a stream reach for various life stages of *O. mykiss* is determined, in
14 part, by the distribution, abundance, and quality of mesohabitats (i.e., pool, riffle, and run), and
15 how these are utilized by the various age classes of *O. mykiss*. Quantitative habitat inventories
16 (mapping) will be conducted periodically in the mainstem river and in North Fork Matilija and
17 San Antonio creeks after substantial channel-altering flow events, approximately every 5 years.
18 Habitat conditions and suitability for *O. mykiss* will be documented so that changes over time may
19 be monitored. CDFW habitat inventory methodology will be followed per CDFW's 2010 Stream
20 Habitat Restoration Manual, Section III.

21 CDFW has determined that subsampling 10 percent of the length of a stream reach is
22 sufficient to accurately describe stream habitat. Selected mainstem and tributary stream sections
23 will be subsampled following CDFW methods. Data will be collected at Level 4, which classifies
24 habitat units into 24 specific habitat types within the riffle, flatwater, and pool categories. Photos
25 will be taken of each individual habitat unit surveyed, facing the upstream and downstream
26 direction, and will be catalogued.

1 **i. Photo Points**

2 In addition to photos taken during habitat surveys, photos may be periodically taken from
3 specific locations throughout the watershed to document visible habitat changes over time. This
4 effort would occur annually in the fall and would continue, with additional photo points added as
5 needed to aid in evaluating specific habitat enhancement projects. Photos may be taken within
6 and from outside of stream channels, depending on the photo point location and the subject of
7 interest (e.g., stream channel or reach, passage impediment/project, developing riparian corridor).

8 **ii. Lagoon and Estuary Breaching**

9 Monitoring of the lagoon and estuary sand bar status may be used to determine migratory
10 access between the river and ocean. A recording water surface elevation probe would be deployed
11 in the lagoon and estuary to monitor water surface elevation throughout the year. Monitoring of
12 lagoon and estuary passage conditions and breaching of the sand bar would include periodic
13 visual observations from November 1 through June 30 each year to determine dates of sandbar
14 breach and lagoon and estuary closure. Lagoon and estuary monitoring is currently conducted by
15 Casitas Municipal Water District and would not be duplicated by this element of the monitoring
16 program unless the current monitoring effort is curtailed.

17 **5. Incidental Take**

18 Although the proposed monitoring program has been designed to reduce the risk of injury
19 and mortality of *O. mykiss*, electrofishing and tagging require handling that contributes to stress as
20 well as some level of risk of mortality. Snorkel surveys, habitat monitoring, flow monitoring,
21 water quality monitoring, and lagoon and estuary breaching are not expected to result in
22 incidental take of *O. mykiss* other than temporary and localized disturbance. As the *O.*
23 *mykiss* population grows in size within the watershed the numbers of juvenile *O. mykiss* collected
24 in electrofishing is expected to increase. Mortality of collected juvenile *O. mykiss* is expected to
25 be substantially less than 5%.

26 Monitoring the status and response of *O. mykiss* to the proposed Physical Solution is a
27 fundamental element in determining the performance of the actions in benefiting the *O.*
28 *mykiss* population and the contribution of the program to conservation of the species. Information

1 on abundance of various life stages of *O. mykiss*, reproductive success, age and growth, juvenile
2 survival, adult returns, and cohort replacement rates are all important metrics used to assess the
3 status of the species. The proposed monitoring plan will contribute to the growing body of
4 scientific information on the status and trends in *O. mykiss* size, abundance, and geographic
5 distribution, as well as factors affecting the quality and availability of suitable habitat for *O.*
6 *mykiss* within the mainstem river and major tributaries.

7 **6. Reporting**

8 Annual monitoring reports will present a tabular and graphic summary of monitoring
9 results of each year's activities. For the purposes of annual reporting, the monitoring period has
10 been defined as the water year extending from October 1 through September 30. The annual
11 report format will be standardized. Annual reports will be publicly available in January of the
12 year following each year of monitoring activities.



Appendix E

UVRGA Stakeholder Engagement Plan

**STAKEHOLDER ENGAGEMENT PLAN
UPPER VENTURA RIVER GROUNDWATER BASIN
(4-003.01) VENTURA COUNTY, CALIFORNIA**

**SUSTAINABLE GROUNDWATER MANAGEMENT ACT
(SGMA) PROGRAM**

**PREPARED AND ADOPTED BY THE UPPER VENTURA
RIVER GROUNDWATER AGENCY, MAY 10, 2018**

UPDATED SEPTEMBER 10, 2020

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1 INTRODUCTION

This Stakeholder Engagement Plan (Engagement Plan) summarizes the strategies to educate and involve stakeholders (those individuals and representatives of organizations who have a direct stake in the outcome of the planning process) and other interested parties in the preparation and implementation of a Groundwater Sustainability Plan (GSP) for the Upper Ventura River Groundwater Basin (UVR Basin) – Department of Water Resources (DWR) Basin No. 4-003.01 (Figure 1). This GSP will be prepared in accordance with the Sustainable Groundwater Management Act (SGMA), which was signed by Governor Brown in September 2014 and became effective January 1, 2015.

SGMA provides a framework to regulate groundwater for the first time in California’s history. The intent of SGMA is to strengthen local management of specified groundwater basins that are most critical to the state’s water needs by regulating groundwater and land use management activities. SGMA also aims to preserve the jurisdictional authorities of cities, counties and water agencies within groundwater basins while protecting existing surface water and groundwater rights.

The Upper Ventura River Groundwater Agency (UVRGA or Agency), a Groundwater Sustainability Agency (GSA), was formed by five local agencies: County of Ventura (County), City of San Buenaventura (City), Casitas Municipal Water District (CMWD), Meiners Oaks Water District (MOWD), and Ventura River Water District (VRWD). There was extensive stakeholder engagement during that process. The governing board consists of one representative from each of those agencies plus two stakeholder directors representing environmental and agricultural interests. The GSA is responsible for developing a GSP for the UVR Basin to achieve long-term groundwater sustainability. Additionally, SGMA requires and directs GSAs to encourage active involvement of stakeholders and interested parties in the process to sustainability manage the basin.

2 PURPOSE

The purpose of the outreach activities described in this Engagement Plan is to encourage the active involvement of individual stakeholders and stakeholder organizations, and other interested parties in the development and implementation of the GSP for the UVR Basin. This GSP is required under SGMA to be completed no later than January 31, 2022. The projects and management actions necessary to implement the GSP could affect individuals and groups who have a stake in ensuring the basin is sustainably managed as required by SGMA.

In an effort to understand and involve stakeholders and their interests in the decision- making and activities, the UVRGA has prepared this Engagement Plan to encourage broad, enduring and productive involvement during the GSP development and implementation phases. This Engagement Plan will assist the UVRGA in providing timely information to stakeholders and receive input from interested parties during GSP development. This Engagement Plan will identify stakeholders who have an interest in groundwater in the UVR Basin, and recommend outreach, education and communication strategies for engaging those stakeholders during the development and implementation of the GSP. The plan also includes an approach for evaluating

the overall success of stakeholder engagement and education of both stakeholders and the public. In consideration of the interests of all beneficial uses and users of groundwater in the basin, this Engagement Plan has been developed pursuant to California Water Code Section 10723.2. Additionally, this Engagement Plan has been developed to encourage the active involvement of diverse social, cultural, and economic elements of the population within the UVR Basin, in accordance with GSP Regulations Section 354.10.

3 GENERAL INFORMATION

The following personnel will serve as contacts for the public during GSA formation and GSP preparation.

3.1 Agency Administrator

For general information about UVRGA and the GSP status, contact:

Maureen Tucker, Paralegal, Olivarez, Madruga, Lemieux, O’Neill, LLP, (805)495-4770, email mtucker@omlolaw.com

3.2 Executive Director and GSP Project Manager

The UVRGA’s Executive Director and GSP Project Manager will be available for stakeholders and the public seeking specific detailed information about the GSP. Contact:

Bryan Bondy, PG, CHG, (805) 212-0484, email BBondy@uvrgroundwater.org

4 OUTREACH ACTIVITIES

The UVRGA will implement the following outreach activities to maximize stakeholder involvement during the development of the GSP and throughout SGMA implementation.

4.1 Public Notices

To ensure that the general public is apprised of local activities and allow stakeholders to access information, SGMA specifies several public notice requirements for GSAs. Refer to Table 1 in Appendix A for a summary of statutory requirements. Three sections of the California Water Code require public notice fees before establishing a GSA, adopting (or amending) a GSP, or imposing or increasing fees:

- Section 10723(b). “Before electing to be a groundwater sustainability agency, and after publication of notice pursuant to Section 6066 of the Government Code, the local agency or agencies shall hold a public hearing in the county or counties overlying the basin.”
- Section 10728.4. “A groundwater sustainability agency may adopt or amend a groundwater sustainability plan after a public hearing, held at least 90 days after providing notice to a city or county within the area of the proposed plan or amendment. ...”
- Section 10730(b)(1). “Prior to imposing or increasing a fee, a groundwater sustainability agency shall hold at least one public meeting, at which oral or written presentations may be made as part of the meeting....(3) At least 10 days prior to the meeting, the groundwater sustainability agency shall make available to the public data upon which the

proposed fee is based.”

- In accordance with California Water Code Section 10723(b), the following was noticed to the public: On March 9, 2017, the UVRGA held a public hearing to consider becoming a GSA for the UVR Basin. The public hearing was noticed in the *Ventura County Star* and *Ojai Valley News* in accordance with Government Code Section 6066.
- Future noticing will occur as required by SGMA.

4.2 Stakeholder Identification

Pursuant to Water Code Sections 10723.8(a)(4) and 10723.2, the Agency will consider the interests of all beneficial uses and users of groundwater, as well as those responsible for implementing a GSP.

UVRGA has engaged stakeholders in the development of the Agency to serve as the GSA. For example, during development of the joint powers authority agreement (“JPA Agreement”) forming the Agency, the signatory members held numerous public meetings to discuss important terms to be included in the JPA Agreement. The signatory members also held multiple stakeholder outreach meetings to engage and educate stakeholders within the UVR Basin about the SGMA requirements the JPA Agreement, and the Agency’s intention to form a GSA for the UVR Basin. In addition to the Agency’s public outreach efforts, it also designated two seats on its seven-seat Board of Directors for Stakeholder Directors: one seat is reserved for an Agricultural Stakeholder Director and one seat is reserved for an Environmental Stakeholder Director.

The Agency plans to continue its practice of seeking broad stakeholder engagement in management of the UVR Basin’s groundwater resources as it undertakes the process to develop and implement the Plan for the UVR Basin over the next several years.

SGMA mandates that a GSA establish and maintain a list of persons interested in receiving notices regarding plan preparation, meeting announcements, and availability of draft plans, maps, and other relevant documents. The UVRGA compiled a list of interested persons for this purpose that will be maintained throughout the GSA formation and GSP development phases. An initial list of stakeholders and interested parties include, but are not limited to, the following:

- a) Holders of overlying groundwater rights, including:
 - 1) Agricultural well owners - There are agricultural users of groundwater operating on land overlying the UVR Basin. To account for these users’ interests, the Agency designated a seat on its seven-member governing board to be filled by an Agricultural Stakeholder Director. The Agricultural Stakeholder Director is appointed from nominations received by the Ventura County Farm Bureau. The Agricultural Stakeholder Director is responsible for engaging the UVR Basin’s agricultural users of groundwater and representing their interests before the Agency.
 - 2) Domestic well owners - There are many domestic wells overlying the UVR Basin. It is believed that the majority—if not all—of these domestic well owners are de minimis users, as defined by SGMA. The Agency anticipates

that the Plan will address the collective interests of domestic users of groundwater wells and plans to engage in outreach to domestic well owners throughout the development of the Plan through inviting their participation in the Agency's public meetings.

- b) Municipal Well Operators - The Agency is a joint powers authority created by five local public agencies. Two of the Agency's signatory members—the City of San Buenaventura and Casitas Municipal Water District—operate municipal wells within the UVR Basin and are represented on the Agency's Board of Directors.
- c) Public water systems
 - 1) Casitas Municipal Water District
 - 2) Casitas Mutual Water Company
 - 3) Meiners Oaks Water District
 - 4) Rancho Matilija Mutual Water Company
 - 5) Tico Mutual Water Company
 - 6) Ventura River Water District
 - 7) Ventura Water (City of San Buenaventura)

Signatory members to the JPA Agreement forming the Agency, as well as the Agency itself, have communicated with these entities throughout development of the JPA Agreement and the Agency's decision to form a GSA for the UVR Basin. The Agency will continue to communicate with these entities concerning Plan development and implementation and opportunities to participate in the process, including through the advisory committee to be established. In addition to holding multiple public meetings, the Agency also plans to retain a seat on an advisory committee for a representative chosen from among the public water companies overlying the UVR Basin.

- d) Local land use planning agencies - Both the County of Ventura ("County") and the City of Ojai have land use planning authority on land overlying the UVR Basin. The County is a signatory member to the JPA Agreement forming the Agency and represented on the Agency's Board of Directors. As noted above, although the City of Ojai declined to participate in the JPA, the Agency intends to coordinate with the City of Ojai and keep them informed about Plan development activities through public meetings and other outreach. [SEP]
- e) Environmental and Ecosystem - There are numerous environmental organizations dedicated to preserving and maintaining environmental values operating within the boundaries of the UVR Basin. To account for these users' interests, the Agency designated a seat on its seven-member governing board to be filled by an Environmental Stakeholder Director. The Environmental Stakeholder Director is appointed from nominations received from local environmental nonprofit organizations supportive of the UVR Basin's groundwater sustainability. The Environmental Stakeholder Director is responsible for engaging stakeholders within the UVR Basin representing environmental users of surface and groundwater and

representing their interests before the Agency. Environmental organizations include, but are not necessarily limited to:

- 1) California Department of Fish and Wildlife
- 2) State Water Resources Control Board, Instream Flow element of California Water Action Plan
- 3) Los Angeles Regional Water Quality Control Board
- 4) National Marine Fisheries Service
- 5) Santa Barbara Channelkeeper
- 6) Matilija Coalition
- 7) Surfrider Foundation
- 8) Friends of the Ventura River
- 9) Ojai Valley Land Conservancy
- 10) Ojai Green Coalition
- 11) Cal Trout
- 12) Ventura River Watershed Council

f) Surface water users, if there is a hydrologic connection between surface and groundwater. Based on past studies performed in the UVR Basin, there is a hydrologic connection between surface and groundwater in certain areas of the Ventura River. The State Water Resources Control Board (“SWRCB”) identifies Six entities and/or individuals that have claimed either riparian or appropriative surface water rights to the Ventura River. Three of these six rights holders are signatory members to the JPA Agreement forming the Agency and represented on the Agency’s Board of Directors. The Agency plans to engage with the other three water rights holders throughout development of the Plan to better understand and take into account their interests.

- 1) City of San Buenaventura
- 2) Casitas Municipal Water District
- 3) Meiners Oaks Water District
- 4) Ernest Ford
- 5) Michael Cromer
- 6) Rancho Matilija

g) The federal government – No land overlying the UVR Basin is managed by the Federal Government

h) California Native American Tribes

- 1) Barbareño-Ventureño Band of Mission Indians

A representative of overlying California Native American tribes is on the Agency’s interested parties list, as a result of which this individual receives notices of all

Agency meetings and other stakeholder involvement opportunities.

- i) Disadvantaged communities, including, but not limited to, those served by private domestic wells or small community water systems. The community of Casitas Springs is recognized as a disadvantaged community. The community is served by Casitas Mutual Water Company, Ventura River Water District, and Casitas Municipal Water District, the latter two being signatory members to the JPA Agreement forming the Agency. Thus the community is represented on the Agency’s Board of Directors.
 - 1) Casitas Springs
 - 2) Ojala
- j) Entities listed in Section 10927 that are monitoring and reporting groundwater elevations in all or a part of a groundwater basin managed by the groundwater sustainability agency. The County is the designated California Statewide Groundwater Elevation Monitoring (“CASGEM”) entity for the UVR Basin. The County is a signatory member to the JPA Agreement forming the Agency and represented on the Agency’s Board of Directors.

The UVRGA intends to work cooperatively with partner agencies, stakeholders, and interested parties to develop and implement the GSP for the UVR Basin and will maintain a list of stakeholders and interested parties to be included in the formation of the GSP. A person can be added to the interested parties list by following directions on the UVRGA website: <http://www.uvrgroundwater.org> or by contacting the Executive Director.

4.3 Integrated Regional Water Management

The Ventura River Watershed Council is actively involved in the community on a wide range of issues affecting the watershed, including the UVR Basin. The Council prepared a watershed management plan in 2015. Since this group provides a forum for the discussion of issues that are important to the community, it is important for this group to be well informed throughout GSP development. Representatives from the UVRGA attend Council meetings to provide up-to-date information and hear feedback from Council members.

4.4 Public Hearings/Meetings

4.4.1 Planning Commission

Updates on SGMA planning and implementation will be provided to the Ventura County and City of Ojai Planning Commissions.

4.4.2 Public Meetings

Comprehensive stakeholder involvement will include regularly scheduled public meetings to aid in developing and implementing the GSP. Each GSP chapter will be the subject of a public meeting to receive comments prior to approval. In addition to signing up to receive information about GSP development at the UVRGA webpage, interested parties may participate in the development and implementation of the GSP by attending and participating in public meetings (Water Code Section 10727.8(a)). Prior public meetings have been held at the Casitas Municipal Water District, 1055 Ventura Avenue, Oak View, or the Oak View Community Center, 18 Valley Rd, Oak View. Future public meetings will likely be held at these locations. During the COVID-18 pandemic, public meetings have been and will be held virtually using GotoMeeting

or similar platform. Special meetings may be held at different locations to accommodate a larger attendance. Each meeting will have a scheduled time for public comments. Information about upcoming meetings can be found on the UVRGA website: <http://www.uvrgroundwater.org>.

4.4.3 Local Agency Meetings

To ensure their constituency is kept informed of the progress of GSP development and implementation, the Directors representing UVRGA member agencies, which consist of County of Ventura, City of San Buenaventura , Casitas Municipal Water District , Meiners Oaks Water District, and Ventura River Water District have committed to providing periodic updates during their regularly scheduled board meetings. These meetings offer a chance for the public to receive information and provide comment. Information about upcoming meetings are provided on the following agency websites, or by the means each agency currently meets its legal noticing requirements, whichever is appropriate:

<http://venturariverwd.com>

<http://casitaswater.org>

<http://meinersoakswater.com>

<http://cityofventura.ca.gov>

<http://ventura.org> (Board of Supervisors and Planning Commission)

4.5 Direct Mailings/Email

Public meetings and project information will be disseminated through email, from the Agency office, or direct mail under special circumstances if requested. This communication will provide information for the Ventura River valley community, public agencies, and other interested persons/organizations about milestones, meetings, and the progress of GSP development. Property owners with groundwater wells within the basin are notified via email and/or direct mailings about the establishment of an interested persons list and given the opportunity to receive future notices.

4.6 Newsletters/Columns

Updates will be provided to the *Ventura County Star* and the *Ojai Valley News* newspapers to advise, educate, and inform the public on SGMA implementation.

4.7 UVRGA Website

Updates on the GSP development and implementation will be provided on the UVRGA website. In addition, general information about SGMA and groundwater conditions will be produced by the UVRGA. This information will include maps, timelines, frequently asked questions, groundwater information, and schedules/agenda of upcoming meetings and milestones. This information will be accessible on the UVRGA webpage located at:

<http://www.uvrgroundwater.org>. UVRGA staff will update the website and invite users to request information or be added to the interested persons list.

4.8 Database

To distribute information about GSP development, an email list has been compiled into a database of interested persons and stakeholders. The database will be updated regularly to add names of attendees at public meetings along with those requesting information via email or the

through the UVRGA website.

4.9 Tribal Engagement

Portions of the Barbareno-Ventureno Band of Mission Indians are located within the UVR Basin. Although the tribe is not subject to the requirements of SGMA, any federally recognized Indian tribe may voluntarily participate with GSAs in the preparation or administration of a GSP.

Since tribal participation is integral to the success of groundwater sustainability in the UVR Basin, tribal participation is encouraged. After the UVRGA was formed, communication was established with the Tribal Elder, Julie Tumamait, to determine the preferred level of involvement throughout GSP development and implementation. UVRGA will maintain close contact with Barbareno-Ventureno Band of Mission Indians throughout the GSP development process and GSP implementation.

4.10 Additional Opportunities

Additional opportunities for stakeholder participation (e.g., an advisory committee) will be considered as GSP development progresses and as stakeholder interests evolve.

5 EVALUATION

To determine the level of success of the Engagement Plan, the UVRGA will implement the following measures:

5.1 Attendance/Participation

A record of those attending public meetings will be maintained throughout the GSP development process. The UVRGA will utilize sign-in sheets and request feedback from attendees to determine adequacy of public education and productive engagement in the GSP development and implementation process. Meeting minutes will also be prepared and will be provided on the UVRGA website once approved.

5.2 Adherence to Schedule

Public participation in developing projects and management actions for inclusion in the GSP is instrumental to the success of the GSP. Keeping these tasks on schedule will be an important indicator of stakeholder involvement.

5.3 Plan Update

This Plan will be updated at least annually.

APPENDIX A

TABLE 1

<i>During GSA Formation:</i>	
“Before electing to be a groundwater sustainability agency... the local agency or agencies shall hold a public hearing.”	Water Code Sec. 10723 (b)
“A list of interested parties [shall be] developed [along with] an explanation of how their interests will be considered.”	Water Code Sec. 10723.8.(a)(4)
<i>During GSP Development and Implementation:</i>	
“A groundwater sustainability agency may adopt or amend a groundwater sustainability plan after a public hearing”.	Water Code Sec. 10728.4
“Prior to imposing or increasing a fee, a groundwater sustainability agency shall hold at least one public meeting”.	Water Code Sec. 10730(b)(1)
“The groundwater sustainability agency shall establish and maintain a list of persons interested in receiving notices regarding plan preparation, meeting announcements, and availability of draft plans, maps, and other relevant documents”.	Water Code Sec. 10723.4
“Any federally recognized Indian Tribe... may voluntarily agree to participate in the preparation or administration of a groundwater sustainability plan or groundwater management plan... A participating Tribe shall be eligible to participate fully in planning, financing, and management under this part”.	Water Code Sec. 10720.3(c)
“The groundwater sustainability agency shall make available to the public and the department a written statement describing the manner in which interested parties may participate in the development and implementation of the groundwater sustainability plan”.	Water Code Sec. 10727.8(a)
<i>Throughout SGMA Implementation:</i>	
“The groundwater sustainability agency shall consider the interests of all beneficial uses and users of groundwater”.	Water Code Sec. 10723.2
“The groundwater sustainability agency shall encourage the active involvement of diverse social, cultural, and economic elements of the population within the groundwater basin”.	Water Code Sec. 10727.8(a)



Appendix F

List of Public Meetings (Reg. §354.10)



Upper Ventura River
GROUNDWATER AGENCY
SUSTAINABLE MANAGEMENT

Groundwater Sustainability Plan (GSP)

202 W. El Roblar Dr.
Ojai, CA 93023
(805) 646-2114
www.uvrgroundwater.org

Historical Information on Public Meetings Related to the GSP Development
(Time Period: 2017-December through 2022-January)

MEETING DATE	MEETING TYPE (Regular, Special, Workshop)	ACTION ITEM (Agenda Item Title)	RECOMMENDED ACTION (Agenda Item Description)	ACTION TAKEN (Approved, No Motion, Deferred, Continued)
2017-12-14	Regular	GSP initial notification.	Approval of Initial Notification to DWR of Development of a Groundwater Sustainability Plan.	Approved.
2018-04-12	Regular	GSP technical scope Tasks 1, 2.2, 2.5, 2.6, 3.1	SOPs and QA/QC document approval. Surface water flow and subsurface inflow studies. Stakeholder Engagement Plan approval.	Continued.
2018-05-03	Regular	GSP technical scope Task 1	Board comments on Draft Monitoring and Data Collection Protocols.	Continued.
2018-05-10	Regular	GSP technical scope Tasks 1, 2.2, 2.6, 3.1	Monitoring and Data Collection Protocols. Surface water flow and subsurface inflow studies. Stakeholder Engagement Plan approval.	Approved.
2018-06-14	Regular	GSP technical scope Tasks 1, 3.1	Data Quality Control review implementation. GSP Grant Work Plan Update. Stakeholder Engagement Plan Implementation.	Continued.
2018-07-12	Regular	GSP technical scope Tasks 1, 2.2, 3.1	Data Quality Control review implementation. Surface water flow study update. Technical Advisory Committee establishment.	Continued.
2018-09-13	Regular	GSP technical scope Tasks 1, 2.1, 3.1	Monitoring and Data Collection Protocols revision. Data Quality Control Review implementation. Groundwater Monitoring Network update.	Approved.
2018-09-13	Regular	GSP technical scope Task 3.1	Technical Advisory Committee establishment guidelines.	Continued.
2018-10-11	Regular	GSP Tasks Update	Prop 1 Sustainable Groundwater Planning (SGWP) Grant Agreement execution. State Water Resources Control Board Groundwater-Surface Water Workshop authorization.	Approved.



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Historical Information on Public Meetings Related to the GSP Development
 (Time Period: 2017-December through 2022-January)

MEETING DATE	MEETING TYPE (Regular, Special, Workshop)	ACTION ITEM (Agenda Item Title)	RECOMMENDED ACTION (Agenda Item Description)	ACTION TAKEN (Approved, No Motion, Deferred, Continued)
2018-11-08	Regular	GSP Tasks Update	Technical Advisory Committee recruitment.	Continued.
2019-01-10	Regular	GSP Tasks Update (Grant Task Nos. 2, 6, and 9)	Grant Task Nos. 6 (Subsurface Inflow Data) and 2 (Project Monitoring Plan) approval. GSP Project Management Planning (Grant Task 9 – Organizational Activities) presentation. Technical Review Group (Grant Task 9 – Organizational Activities) discussion.	Approved.
2019-03-14	Regular	GSP Tasks Update (Grant Category (b) and (c), Task 9)	Extraction Fee Development update. Data Gap Tasks update. GSP development support services consideration of INTERA. GSP Technical Review Group selection.	Approved.
2019-03-28	Regular	Extraction Fees (Grant Category (c), Task 9)	Multi-Year Budget and Groundwater Extraction Fee.	Continued.
2019-04-11	Regular	Extraction Fees (Grant Category (c), Task 9)	Multi-Year Budget and Groundwater Extraction Fee update. GSP Development Support Services.	Approved.
2019-05-09	Regular	Extraction Fees (Grant Category (c), Task 9)	Fee Study Report consideration. Extraction Fee Recommendations review.	Approved.
2019-06-13	Regular	Stakeholder Engagement Plan (Grant Category (c), Task 10)	Stakeholder Engagement Plan annual review and update	Deferred.
2019-07-11	Regular	No GSP relevant items	n/a.	n/a.
2019-10-10	Regular	GSP Tasks Update (Grant Category (b), and (c), Task 10)	Stakeholder Engagement Plan annual review and update. Data Gap Tasks update.	Continued.
2019-11-14	Regular	Stakeholder Engagement Plan (Grant Category (c), Task 10)	Stakeholder Engagement Plan annual update and implementation. Intera Work Order No. 2 (GSP development) approval.	Approved.
2019-12-12	Regular	GSP Development and Preparation (Grant Category (d): Task 11)	Kear Groundwater Work Order No. 7 (GSP development) approval.	Approved.
2020-01-24	Special Meeting	No GSP relevant items	n/a.	n/a.



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Historical Information on Public Meetings Related to the GSP Development
 (Time Period: 2017-December through 2022-January)

MEETING DATE	MEETING TYPE (Regular, Special, Workshop)	ACTION ITEM (Agenda Item Title)	RECOMMENDED ACTION (Agenda Item Description)	ACTION TAKEN (Approved, No Motion, Deferred, Continued)
2020-02-13	Regular	GSP Tasks Update (Grant Category (b), Tasks 1, 3, and 7)	Well Monitoring Network Annual Data Logger and Surface Water – Groundwater Interface Monitoring reports. Surface Water Flow Data Technical Memorandum. DMS demonstration. Report on meeting with DWR and SWRCB.	Approved.
2020-03-12	Regular	GSP Development and Preparation (Grant Category (d) Task 11)	GSP development update.	No motion required.
2020-03-12	Regular	Stakeholder Engagement Plan (Grant Category (c), Task 10)	Plan for Workshop No. 1 scheduling.	Approved.
2020-03-12	Regular	GSP Development and Preparation (Grant Category (d) Task 11)	Groundwater Dependent Ecosystems.	No motion required.
2020-03-23	Special Meeting	No GSP relevant items	n/a.	n/a.
2020-04-09	Regular	GSP Tasks Update (Grant Categories (d), Task 11 and (c) Task 10).	GSP progress update. Groundwater Sustainability Plan Workshop No. 1 cancellation.	No motion required.
2020-04-09	Regular	Grant Administration (Grant Category (a)).	Sustainable Groundwater Management Planning Grant Proposed Amendments.	Approved.
2020-05-14	Regular	GSP Tasks Update (Grant Category (d), Task 11; and (e)).	GSP progress update. Intera Work Order No. 3 approval. Amendment No. 1 to Kear Groundwater Work Order No. 1 approval.	Approved.
2020-06-11	Regular	GSP Tasks Update (Grant Category (d), Task 11; and (e)).	Sustainability Goal Discussion, draft approval.	Approved.
2020-06-23	Special Meeting	GSP Development and Preparation (Grant Category (d); Task 11)	Sustainability Goal Discussion, draft approval.	Approved.
2020-07-09	Regular	GSP Development and Preparation (Grant Category (d); Task 11)	GSP progress update.	No motion required.
2020-07-09	Regular	Stakeholder Engagement Plan (Grant Category (c); Task 10)	Ad Hoc Stakeholder Engagement Plan annual review.	Approved.



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Groundwater Sustainability Plan (GSP)

Historical Information on Public Meetings Related to the GSP Development (Time Period: 2017-December through 2022-January)

MEETING DATE	MEETING TYPE (Regular, Special, Workshop)	ACTION ITEM (Agenda Item Title)	RECOMMENDED ACTION (Agenda Item Description)	ACTION TAKEN (Approved, No Motion, Deferred, Continued)
2020-07-20	Workshop	Stakeholder Engagement Plan (Grant Category (c), Task 10)	Executive Director Bondy presented an interactive webinar providing an overview of SGMA, description of GSP components, and description of the Agency's process and schedule for developing the GSP.	No motion required.
2020-08-13	Regular	GSP Development and Preparation (Grant Category (d); Task 11)	GSP progress update. GSP Workshop No. 1 Recap. Sustainability Goal approval. Sustainable Management Criteria screening results. Pumping estimation for GSP discussion.	Approved.
2020-08-13	Regular	Grant Administration (Grant Category (a))	Pursue Biological Consulting and Field Monitoring Support Services Contract consideration - Rincon Consultants, Inc.	Approved.
2020-09-10	Regular	GSP Development and Preparation (Grant Category (d); Task 11)	GSP progress update.	No motion required.
2020-09-10	Regular	Stakeholder Engagement Plan (Grant Category (c), Task 10)	Stakeholder Engagement Plan annual review amendment approval.	Approved.
2020-10-08	Regular	GSP Development and Preparation (Grant Category (d); Task 11)	GSP progress update.	No motion required.
2020-10-08	Regular	Establish Monitoring Network (Grant Category (b); Task 1)	Rincon Consultants Work Order No. 2 approval.	Approved.
2020-11-12	Regular	GSP Development and Preparation (Grant Category (d); Task 11)	GSP progress update.	No motion required.
2020-12-10	Regular	GSP Development and Preparation (Grant Category (d); Task 11)	GSP progress update. Subsidence Sustainability Indicator discussion. Discussion of assumptions for 50-Year Future Model Simulations.	No motion required.
2021-01-14	Regular	GSP Development and Preparation (Grant Category (d); Task 11)	GSP progress update.	No motion required.
2021-01-14	Regular	Stakeholder Engagement Plan (Grant Category (c), Task 10)	Workshop No. 2 scheduling (Mar. 2nd). GSP Newsletter Volume 2, Issue 1 approval.	Approved.



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Groundwater Sustainability Plan (GSP)

Historical Information on Public Meetings Related to the GSP Development
 (Time Period: 2017-December through 2022-January)

MEETING DATE	MEETING TYPE (Regular, Special, Workshop)	ACTION ITEM (Agenda Item Title)	RECOMMENDED ACTION (Agenda Item Description)	ACTION TAKEN (Approved, No Motion, Deferred, Continued)
2021-01-14	Regular	GSP Development and Preparation (Grant Category (d); Task 11)	Degraded Water Quality Sustainability Indicator discussion.	No motion required.
2021-02-11	Regular	GSP Development and Preparation (Grant Category (d); Task 11)	GSP progress update.	No motion required.
2021-02-11	Regular	Establish Monitoring Network (Grant Category) (b); Task 1)	Well Monitoring Network annual data deliverable for Water Year 2019/2020 - consideration.	Approved.
2021-02-11	Regular	Grant Administration (Grant Category (a)).	Rincon Consultants Work Order No. 1 proposed budget Increase.	Approved.
2021-02-11	Regular	GSP Development and Preparation (Grant Category (d); Task 11)	Item 10d Presentation - Abhishek Singh of Intera described the development of the UVRGA numerical model, including model construction and calibration.	No motion required.
2020-03-02	Workshop No. 2	Stakeholder Engagement Plan (Grant Category (c), Task 10)	Executive Director Bondy and Abhishek Singh, Intera, Inc. presented an interactive webinar consisting of an overview of sustainable management criteria (SMC) requirements, description of numerical flow model construction and calibration, proposed SMC for the degraded water quality sustainability indicator, and next steps for GSP development.	No motion required.
2021-03-11	Regular	GSP Development and Preparation (Grant Category (d); Task 11)	GSP progress update. Groundwater Modeling results update.	No motion required.
2021-03-11	Regular	GSP Development and Preparation (Grant Category (d); Task 11)	Degraded Water Quality SMC.	Approved.
2021-03-11	Regular	Stakeholder Engagement Plan (Grant Category (c), Task 10)	Proposed special meetings for GSP development (4th Thursday of the Month). Workshop No. 3 (April 29th).	No motion required.



Upper Ventura River
GROUNDWATER AGENCY
SUSTAINABLE MANAGEMENT

Groundwater Sustainability Plan (GSP)

202 W. El Roblar Dr.
Ojai, CA 93023
(805) 646-2114
www.uvrgroundwater.org

Historical Information on Public Meetings Related to the GSP Development
(Time Period: 2017-December through 2022-January)

MEETING DATE	MEETING TYPE (Regular, Special, Workshop)	ACTION ITEM (Agenda Item Title)	RECOMMENDED ACTION (Agenda Item Description)	ACTION TAKEN (Approved, No Motion, Deferred, Continued)
2021-03-25	Special Meeting	GSP Development and Preparation (Grant Category (d); Task 11)	Item 7a Presentation - Groundwater Modeling results - Executive Director Bondy gave a presentation addressing SMC development status and schedule, surface water and groundwater budgets, and pumping effects on groundwater levels.	No motion required.
2021-04-08	Regular	GSP Development and Preparation (Grant Category (d); Task 11)	Executive Director Bondy and Rincon Consultants staff members Steve Howard and Kiernan Btralik provided a presentation concerning SMC for the chronic lowering of groundwater levels and reduction of groundwater storage sustainability indicators.	No motion required.
2021-04-22	Regular	GSP Development and Preparation (Grant Category (d); Task 11)	Executive Director Bondy and Rincon Consultants staff members Steve Howard and Kiernan Btralik provided a presentation concerning SMC for the depletions of interconnected surface water sustainability indicator.	No motion required.
2021-04-29	Workshop No. 3	Stakeholder Engagement Plan (Grant Category (c), Task 10) GSP Development and Preparation (Grant Category (d); Task 11)	Executive Director Bondy and Rincon Consultants staff members Steve Howard and Kiernan Btralik presented an interactive webinar consisting of an overview of SMC requirements, groundwater dependent ecosystems identification, and proposed SMC for the groundwater levels, groundwater storage, and depletions of interconnected surface water sustainability indicators.	No motion required.
2021-05-13	Regular	GSP Development and Preparation (Grant Category (d); Task 11)	GSP progress update.	No motion required.



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MEETING DATE	MEETING TYPE (Regular, Special, Workshop)	ACTION ITEM (Agenda Item Title)	RECOMMENDED ACTION (Agenda Item Description)	ACTION TAKEN (Approved, No Motion, Deferred, Continued)
2021-05-13	Regular	GSP Development and Preparation (Grant Category (d); Task 11)	Items 10b and 10c Presentations -Groundwater level and storage and depletion of interconnected surface water sustainability indicators SMC. Executive Director Bondy prefaced Items 10b and 10c by reminding everyone that the SMC for the GSP are a starting point.	Approved.
2021-05-27	Special Meeting	GSP Development and Preparation (Grant Category (d); Task 11)	Item 7a Presentation - GSP 20-Year Implementation budget projection, Fiscal Year 2022 budget, and Multi-Year budget projection.	Approved.
2021-05-27	Special Meeting	GSP Development and Preparation (Grant Category (d); Task 11)	Discussion of Process for releasing the Draft GSP for Public Comment schedule.	No motion required.
2021-06-10	Regular	GSP Development and Preparation (Grant Category (d); Task 11)	GSP progress update.	No motion required.
2021-07-08	Regular	GSP Development and Preparation (Grant Category (d); Task 11)	GSP progress update.	No motion required.
2021-07-08	Regular	GSP Development and Preparation (Grant Category (d); Task 11)	Obtain Board feedback on the Preliminary Draft GSP Executive Summary and Sections 1 through 3.	No motion required.
2021-07-22	Special Meeting	GSP Development and Preparation (Grant Category (d); Task 11)	Obtain Board feedback on the Preliminary Draft GSP Sections 4 through 7.	No motion required.
2021-08-12	Regular	GSP Development and Preparation (Grant Category (d); Task 11)	GSP progress update. Preliminary Draft GSP was updated and a Draft GSP was issued on August 10 for a 60-day Public Comment period.	No motion required.
2021-08-12	Regular	GSP Development and Preparation (Grant Category (d); Task 11)	Degraded Water Quality SMC reconsideration.	Approved.



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MEETING DATE	MEETING TYPE (Regular, Special, Workshop)	ACTION ITEM (Agenda Item Title)	RECOMMENDED ACTION (Agenda Item Description)	ACTION TAKEN (Approved, No Motion, Deferred, Continued)
2021-09-09	Regular	GSP Development and Preparation (Grant Category (d); Task 11)	GSP progress update. The Draft GSP is out for public comment. Executive Director Bondy issued a special newsletter about the Draft GSP Public Comment period and was interviewed by the Ojai Valley News for an article that ran on August 26.	No motion required.
2021-08-12	Special Meeting	Stakeholder Engagement Plan (Grant Category (c), Task 10) GSP Development and Preparation (Grant Category (d); Task 11)	GSP Stakeholder Workshop 4B. Executive Director Bondy gave a presentation summarizing the Draft GSP.	No motion required.
2021-10-14	Regular	GSP Reviews and Approvals (Grant Category (e); Task 12)	GSP update. Review of Draft GSP Public Comments.	No motion required.
2021-10-14	Regular	Grant Administration (Grant Category (a))	Intera, Inc. Work Order No. 3 budget modification.	Approved.
2021-10-14	Regular	Grant Administration (Grant Category (a))	Rincon Consultants, Inc. Work Order No. 1 budget modification.	Approved.
2021-11-15	Special Meeting	GSP Reviews and Approvals (Grant Category (e); Task 12)	GSP update and review. Moved for preparation of a tentative final GSP. Schedule public hearing for GSP adoption 12/9/2021.	Approved.
2021-11-15	Special Meeting	Grant Administration (Grant Category (a))	Intera, Inc. Work Order No. 4 Annual Report and Numerical Model Update.	Approved.
2021-12-09	Special Meeting	GSP Reviews and Approvals (Grant Category (e); Task 12)	GSP update. Public Hearing to consider adoption of the GSP for UVRGB via Resolution 2021-06 postponed to 1/6/2021 to address additional public comments.	Approved.
2021-01-06	Special Meeting	GSP Reviews and Approvals (Grant Category (e); Task 12)	Public Hearing to consider adoption of the GSP for UVRGB via Resolution 2021-06.	Approved.
2021-01-13	Regular	GSP Reviews and Approvals (Grant Category (e); Task 12)	GSP update.	No motion required.



Appendix G

GSP Comments and Responses (Reg. §354.10)

Responses to Comments Table

Comment Number	Entry Date	First Name	Last Name	Email Address	Phone Number	Mailing Address	GSP Referenced	Comment/Question	Response
1	3-Feb-21	Benjamin	Pitterle	ben@sbck.org	805-636-6189	Santa Barbara Channelkeeper 714 Bond Avenue Santa Barbara, CA 93103	4.4.2 Minimum Thresholds	Significant and unreasonable effects impacting surface water quality are caused by groundwater conditions throughout portions of the basin. Lowering of groundwater levels reduces surface flows. Reduced surface flows may cause water quality conditions that do not support beneficial uses. Such water quality conditions include lowered dissolved oxygen and increased temperatures. These flow-related impacts are highlighted in various watershed studies including the TMDL for Algae, Eutrophic Conditions, and Nutrients in the Ventura River. Water quality impacts to interconnected surface waters due to groundwater pumping should be addressed within the Groundwater Sustainability Plan. The Draft Sustainable Management Criteria for Degraded Water Quality acknowledges this surface-groundwater interdependence related to nitrate. The GSP should similarly address interdependences related to dissolved oxygen and temperature. Thank you for your consideration.	Effects on aquatic beneficial users related to flow are addressed in the GSP through the development of sustainable management criteria for the depletions of interconnected surface water (see GSP text Section 4.9). It is also noted that the GSP recommends monitoring programs for both the Confluence Aquatic Habitat Area GDE and Foster Park Aquatic GDE that include water quality monitoring, field observations of instream habitat and aquatic species, and in-situ water quality and flow measurements (Section 5.0). The details of the monitoring programs will be decided when the monitoring workplans are developed and approved by the UVRGA Board.
2	18-Jun-21	Paul	Jenkin	pjenkin@surfrider.org		Surfrider Foundation		This memo is a follow up from our conversation regarding development of the Groundwater Sustainability Plan (GSP). The primary concern we discussed is the elimination of large portions of the basin from SGMA oversight through the assumption that surface water is somehow “disconnected” from groundwater. Apart from the fact that there are fundamental flaws in the methodology used to make this determination, the resulting conclusions and management criteria are not consistent with avoiding undesirable results.	As discussed in the responses to several comments below, there is clear evidence from both measured data and numerical modeling that the Ventura River is disconnected from the underlying water table in much of the Robles and Santa Ana Areas most of the time. However, this is not the reason for concluding that riparian vegetation and critical riffles in the Robles and Santa Ana Areas are not significantly and unreasonably impacted by pumping. That conclusion was made based on the lack of material groundwater dependency (in the case of riparian vegetation; Appendix O and GSP text Section 3.2.7.2.1) and the low modeled stream flow depletion rates compared to typical flows (in the case of the critical riffles; Appendix P and Appendix N, and GSP text Sections 3.2.6 and 4.9). The methodologies used are sound and consistent with SGMA requirements (§354.16(f)(g), §354.28(c)(6)).
3	18-Jun-21	Paul	Jenkin	pjenkin@surfrider.org		Surfrider Foundation		The Upper Ventura River Groundwater Basin is a shallow alluvial aquifer integral to the riparian floodplain ecosystem of the main stem Ventura River. Throughout these reaches of the river, groundwater and surface water are connected, and to suggest they are not is to undermine the intent of the Sustainable Groundwater Management Act.	The term interconnected means that the water table is in contact with water in the Ventura River (i.e. no unsaturated sediments exist between the river and the water table). Available data and numerical modeling included in the GSP show that the water table elevation is typically below the Ventura River channel elevation in the Robles and Santa Ana Areas (Section 3.2), which, by definition, means interconnection does not exist at that location. Identifying areas of interconnection and lacking interconnection is a SGMA requirement and does not undermine the intent of SGMA.
4	18-Jun-21, 08-Oct-21	Paul	Jenkin	pjenkin@surfrider.org		Surfrider Foundation		Upon review of the GSP it is clear that the primary Sustainable Management Criteria (SMC) for the Upper Ventura River Groundwater Basin (UVRGB) is the Depletion of Interconnected Surface Water. The analyses presented do not adequately assess the groundwater/surface water interactions within and between the different reaches of the Basin or acknowledge the impact of groundwater pumping on surface flows.	The analysis of Depletion of Interconnected Surface Water (Appendix N and GSP text Sections 3.2.6 and 4.9) meets or exceeds SGMA requirements (§354.28(c)(6)). We encourage the commentator to review the summary of streamflows and streamflow depletions for different reaches of the Ventura River in Table 3.2-01 of the GSP. This table and the corresponding text in Section 3.2.6 of the GSP provides an in-depth assessment of groundwater-surface water interactions and the effects of pumping in the Basin.
5	18-Jun-21, 08-Oct-21	Paul	Jenkin	pjenkin@surfrider.org		Surfrider Foundation		The Riparian Groundwater Dependent Ecosystems Assessment Report characterizes the Robles reach as a “Losing reach with generally disconnected groundwater- surface water.” This categorization eliminates the majority of this Groundwater Dependent Ecosystem from consideration under SGMA by assuming that it is “disconnected” and thus has too great a depth to groundwater to support riparian habitat. Other reaches are similarly dismissed.	The categorization of the groundwater-surface water interaction of the Robles reach has no bearing on whether riparian vegetation is or is not classified as a GDE in the GSP. The decision whether to classify riparian vegetation as groundwater dependent or not is based on vegetation biology (including documented maximum rooting depths for plant species within the riparian communities) and groundwater levels, not the nature of the groundwater-surface water interaction in that reach. The approach for assessing and screening potential GDEs is detailed in depth in Section 2.3 of the Riparian Groundwater Dependent Ecosystem Assessment (Appendix O of the GSP).

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6	18-Jun-21, 08-Oct-21	Paul	Jenkin	pjenkin@surfrider.org		Surfrider Foundation		The analysis presented relies heavily on the Nature Conservancy “Natural Communities (NC) Dataset,” using vegetation communities to eliminate GDE polygons from the Upper Ventura River Groundwater Basin. The NC dataset is a statewide geographic computer database that maps vegetation types in all potential GDEs throughout the State of California. The large geographic scope of this map does not accurately represent current on-the ground conditions, and more robust ground truthing should be undertaken. Even the aerial photos presented tell a different story than is acknowledged in the narrative (i.e. Figure 6 North Robles Habitat Area Photographs, Aquatic GDE Characterization report).	The analysis of groundwater dependency was based on the dominant species indicated for each NCAAG dataset polygon. Biologists on the UVRGA GSP Development Team confirmed the NCAAG dataset classifications are representative of the dominant species throughout the Basin (Appendix O and GSP text Section 3.2.7). UVRGA recognizes that species other than the dominant species are present within the different areas, but concluded that screening based on the dominant species is appropriate for addressing SGMA requirements. As documented through the GDE analysis, it is understood that while riparian communities may exist in certain areas, such as the Robles reach, these communities appear to be dependent on non-groundwater sources of water, and not on material groundwater connection. The aerial photographs in the Aquatic GDE Assessment do show riparian vegetation in the North Robles Reach. However, the assessment of groundwater data, modeling results, and maximum rooting depths indicate that this reach is not groundwater dependent. Modeling results further demonstrate that groundwater pumping has a minimal effect on groundwater elevations in this reach (Appendix L).
7	18-Jun-21, 08-Oct-21	Paul	Jenkin	pjenkin@surfrider.org		Surfrider Foundation		Unfortunately, the UVRGSA analysis does not fully implement the Best Practices for using the NC Dataset guidance provided by the Nature Conservancy, which presents six best practices for using local groundwater data to confirm whether mapped features in the NC dataset are supported by groundwater. (Best Practices for using the NC Dataset, TNC July 2019). According to this guidance: -While depth-to-groundwater levels within 30 feet of the land surface are generally accepted as being a proxy for confirming that polygons in the NC dataset are supported by groundwater, it is highly advised that fluctuations in the groundwater regime be characterized to understand the seasonal and interannual groundwater variability in GDEs. (see Best Practice #2.) -One of the key factors to consider when mapping GDEs is to contour depth-to-groundwater in the aquifer that is supporting the ecosystem (see Best Practice #5).	SGMA requires GSAs to identify groundwater dependent ecosystems within the basin, utilizing data available from the DWR or the best available information (§354.16(g)). The TNC best practices are not adopted by DWR as a regulation or as a best management practice. Having said that, UVRGA endeavored to follow the TNC guidance while identifying and considering GDEs in the GSP. Regarding TNC Best Practice #2, UVRGA did consider groundwater level fluctuations in the riparian GDE screening process by considering high and low groundwater levels during representative wet, normal, and dry years. Thus, the analysis considered the full range of expected groundwater levels. This is explained on page 7 of the Riparian GDE memo. Regarding TNC Best Practice #5, contoured groundwater levels were used in the riparian GDE screening. Modeled groundwater levels were used, which provide gridded groundwater levels throughout the basin, which provides superior coverage compared to solely using observed contours. This is described on page 7 of the memo.
8	18-Jun-21, 08-Oct-21	Paul	Jenkin	pjenkin@surfrider.org		Surfrider Foundation		The GIS Spatial Analysis of Maximum Rooting Depth and Groundwater Level presented in the Riparian GDE document does not present such contour depth-to-groundwater mapping or account for temporal variability	The groundwater level grids (superior to contours) were not depicted in the memo. However, the results of the spatial analysis performed using the grids are described in the memo. UVRGA understands that while the descriptions and approach for analyzing the rooting depth and groundwater level was robust, figures depicting this analysis with modeled groundwater level conditions would aid stakeholder’s understanding. As such, figures depicting modeled groundwater levels throughout the Basin will be included in the Final Riparian GDE Assessment Memo (Appendix O). It should be noted that the actual analysis used grid-based data from the numerical model, which is superior to contours because it provides a continuous distribution of data for analysis. These figures will present the groundwater levels for the 6 hydrologic conditions analyzed in UVRGA’s assessment.

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9	18-Jun-21, 08-Oct-21	Paul	Jenkin	pjenkin@surfrider.org		Surfrider Foundation		<p>Furthermore, TNC guidance acknowledges that: <i>In many situations, the hydrologic connection of NC dataset polygons will not initially be clearly understood if site-specific groundwater monitoring data are not available. If sufficient data are not available in time for the 2020/2022 plan, The Nature Conservancy strongly advises that questionable polygons from the NC dataset be included in the GSP until data gaps are reconciled in the monitoring network. Erring on the side of caution will help minimize inadvertent impacts to GDEs as a result of groundwater use and management actions during SGMA implementation. Many of California's GDEs have adapted to dealing with intermittent periods of water stress, however if these groundwater conditions are prolonged, adverse impacts to GDEs can result.</i></p> <p>Therefore, it is likely that the NC vegetation mapping is representative of conditions in which groundwater levels have been frequently and repeatedly pumped beyond the reach of riparian tree roots. Meanwhile, field observations over the past few wetter years show that the riparian vegetation has rebounded, illustrating how the ecosystem responds with the variation in water years. Receding groundwater levels and corresponding loss of surface flows in the current drought will likely reverse this recent trend, with the potential loss of the many young sycamores.</p>	<p>UVRGA concluded that the plant biology and modeled groundwater levels are sufficient to screen the groundwater dependency of the various dominant vegetation types throughout the Basin. UVRGA concluded that there is compelling evidence to conclude the lack of groundwater dependency in the areas that were not included as GDEs in the GSP.</p> <p>Modeling results indicate that groundwater levels in the Robles and Santa Ana area naturally fluctuate significantly below the rooting depth of the dominant species classified in those areas. UVRGA has modeled the water table elevations (Appendix L) and streamflow absent groundwater pumping and determined that the incremental increase in groundwater levels and streamflow that would occur absent pumping (Appendix N and GSP text Sections 3.2.6 and 4.9) is small and is not the reason sycamores are generally sparse in the Robles and Santa Ana areas. Even absent all pumping in the Basin, UVRGA's biologists do not anticipate widespread recruitment of sycamores in the Robles and Santa Ana Areas, as the difference in groundwater levels does not appear to be particularly meaningful in terms of the water requirements of hardwood species, given the seasonal fluctuation of water availability.</p>
10	18-Jun-21, 08-Oct-21	Paul	Jenkin	pjenkin@surfrider.org		Surfrider Foundation		<p>TNC guidance for determining GDEs recognizes the importance of surface flows; <i>In addition, SGMA requires that significant and undesirable adverse impacts to beneficial users of surface water be avoided. Beneficial users of surface water include environmental users such as plants or animals, which therefore must be considered when developing minimum thresholds for depletions of interconnected surface water.</i></p>	<p>UVRGA has clearly and explicitly considered effects on GDEs in the formulation of the sustainable management criteria for the depletions of interconnected surface water (Section 4.9) and chronic lowering of groundwater levels (Section 4.4).</p>
11	18-Jun-21, 08-Oct-21	Paul	Jenkin	pjenkin@surfrider.org		Surfrider Foundation		<p>The Model Results and SMC Implications Presentation (March 25, 2021) reaches the conclusion that:</p> <ul style="list-style-type: none"> • Basin water budget is dominated by streamflow percolation into the Basin and groundwater discharge to Ventura River • GW pumping averages only ~10% of the GW Budget As low as 4% in wet years Up to 31% in dry years • Basin GW levels will be lower in dry seasons, but Basin will still re-fill in normal to wet years <p>The conclusion that there is no impact from pumping based on the fact that the basin rapidly refills in the wet season points to the likelihood that the surface water is in fact "connected" to groundwater during these periods. Moreover, the fact that pumping represents up to 31% of the budget in the critical dry years raises the question of how these groundwater extractions impact surface flows and groundwater levels.</p>	<p>UVRGA has not concluded that there is no impact from pumping based on the fact that the basin rapidly refills. UVRGA has evaluated the effects of pumping on riparian and aquatic GDEs (Appendix O Figures 4a through 4d; Appendix P Figures 9 through 13; GSP Sections 3.2.6 and 4.9, Table 3.2-01, Figures 4.9-01 and 4.9-03) and developed sustainable management criteria to prevent significant and unreasonable effects on those beneficial users of groundwater. In addition, biological monitoring programs are included in the GSP.</p>
12	18-Jun-21, 08-Oct-21	Paul	Jenkin	pjenkin@surfrider.org		Surfrider Foundation		<p>The Model Results identify four areas of concentrated pumping, three of which directly impact groundwater levels in the "Robles Reach." This reach is the area with the most storage in the basin, and should be considered as the "primary sub-basin" for water supply. Pumping in this reach directly affects conditions throughout the basin.</p>	<p>UVRGA does not agree with the conclusion that pumping in the "Robles Reach" affects conditions throughout the Basin. Pumping in the "Robles Reach" does not have a significant effect on groundwater/surface water conditions upstream of the "Robles Reach". UVRGA agrees that pumping in the "Robles Reach" affects conditions in downstream areas. In fact, UVRGA has calculated and presented the indirect depletion of surface water in the Foster Park and Confluence Habitat areas caused by upstream pumping (Appendix N; GSP Section 3.2.6 and 4.9, Table 3.2-01, Figures 4.9-01 and 4.9-03).</p>

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13	18-Jun-21, 08-Oct-21	Paul	Jenkin	pjenkin@surfrider.org		Surfrider Foundation		<p>The analyses and graphs presented in the Model Results do not provide information on the spacial and temporal surface flow conditions as they relate to groundwater levels. Because the downstream reaches are largely dependent on surface and groundwater flows out of this sub-basin, further analysis is needed to more clearly define the relationship between groundwater levels and surface flows. The analyses should, at a minimum, determine threshold groundwater levels at which surface flows are diminished or eliminated, both in the reach being monitored and downstream. This relationship was established decades ago in the Ventura River Conjunctive Use Report (1978) which states that;</p> <p><i>Flows in the live stretch are affected by both the rate of recharge of the upper part of the Ventura River groundwater basin and by the rate of groundwater extraction from wells in the river.</i></p> <p>Investigations published in the Conjunctive Use Report identified groundwater elevation thresholds in the upper basin at which flows in the live reach will cease;</p> <p><i>when the water level in well 4N23WI6C4 falls below Elevation 495, surface flow in much of the live stretch stops although some pools remain. A flow of 1 cfs or more in the live stretch corresponds with a water level in this well of greater than about Elevation 507.</i></p>	<p>UVRGA is aware of the historically developed correlations between groundwater levels and streamflow and reviewed that information during GSP development. However, the relationship between groundwater levels and surface flows is not a SGMA requirement and is not particularly useful for managing depletions of interconnected surface water because UVRGA is not charged with managing the total flow in the river. UVRGA is only responsible for managing depletion, not total flow. The correlations do not differentiate between total flow and depletion. Models, such as the numerical model developed by UVRGA, are needed to calculate depletion rate. UVRGA has calculated depletion rates (Appendix N and GSP text Section 3.2.6, Table 3.2-01) and has developed SMC to avoid significant and unreasonable depletions (Section 4.9), in accordance with SGMA requirements (§354.16(f)(g), §354.28(c)(6)).</p>
14	18-Jun-21, 08-Oct-21	Paul	Jenkin	pjenkin@surfrider.org		Surfrider Foundation		<p>Groundwater levels also affect surface flows in the Robles Reach, which frequently dries up despite constant inflows. Unfortunately, the Aquatic GDE Impact Analysis is quick to dismiss the effect of groundwater elevation on surface flows;</p> <p><i>No monitoring is recommended at either of the critical riffle aquatic GDEs or the Robles Habitat Area, as impacts from pumping in these areas were determined to be minimal or non-existent.</i></p> <p>This conclusion is inconsistent with the guidance provided in Monitoring Networks and Identification of Data Gaps BMP (DWR 2016) which states:</p> <p><i>23 CCR §354.34(c)(6): Depletions of Interconnected Surface Water. Monitor surface water and groundwater, where interconnected surface water conditions exist, to characterize the spatial and temporal exchanges between surface water and groundwater, and to calibrate and apply the tools and methods necessary to calculate depletions of surface water caused by groundwater extractions. The monitoring network shall be able to characterize the following:</i></p> <p><i>(A) Flow conditions including surface water discharge, surface water head, and baseflow contribution.</i></p> <p><i>(B) Identifying the approximate date and location where ephemeral or intermittent flowing streams and rivers cease to flow, if applicable.</i></p> <p><i>(C) Temporal change in conditions due to variations in stream discharge and regional groundwater extraction.</i></p> <p><i>(D) Other factors that may be necessary to identify adverse impacts on beneficial uses of the surface water. DWR guidance provides detailed information on developing a monitoring network to accurately assess these concerns.</i></p> <p>DWR Guidance provides detailed information on developing a monitoring network to accurately assess these concerns.</p>	<p>Depletion of surface water in the "Robles Reach" was estimated using the numerical model. The model was run with and without pumping to determine streamflow depletions (Appendix N; GSP Section 3.2.6 and 4.9, Table 3.2-01, Figures 4.9-01 and 4.9-03). The results indicated that depletion in the Robles Reach was very small compared to surface water flows during the steelhead migration season. Therefore, it was concluded that there are no significant and unreasonable depletions of surface water in the critical riffle areas caused by pumping. UVRGA concludes that detailed monitoring is not necessary in these areas due to the very low modeled depletions and believes that the limited funding available for monitoring should be prioritized in the Confluence and Foster Park Habitat Areas, where UVRGA has concluded that significant and unreasonable effects could potentially occur. It is also noted that the DWR BMPs are not binding on GSAs and are not intended to be applied without consideration of Basin-specific conditions and priorities relative to potential undesirable results in the Basin.</p>

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15	18-Jun-21, 08-Oct-21	Paul	Jenkin	pjenkin@surfrider.org		Surfrider Foundation		<p>Establishing Minimum Flow Thresholds As described above, the current GSP analysis incorrectly concludes that groundwater pumping has little to no effect on surface flows throughout the majority of the basin. But even for the identified groundwater dependent “Habitat Areas,” the development of minimum flow thresholds is inadequate. For example; <i>For the Foster Park Habitat Area, while the City’s low flow thresholds are based on only one HSI score evaluated in the Padre study (average thalweg depth), we understand this currently provides the best available information to establish minimum thresholds for the depletion of interconnected surface water sustainability criteria.</i></p> <p>This statement ignores best available science, including the recently published CDFW Draft Instream Flow Recommendations (2021) as well as the NMFS Draft Biological Opinion for Foster Park Wellfield (2005).</p>	<p>SGMA does not require UVRGA to establish minimum surface flow thresholds. Rather, SGMA requires UVRGA to establish minimum thresholds for <u>depletion</u> of surface water flow (§354.16(f)(g), §354.28(c)(6)). That is a very critical distinction because it means UVRGA is not responsible for the total flow in the Ventura River. UVRGA has quantified depletion of surface water throughout the Basin (Appendix N; GSP Section 3.2.6 and 4.9, Table 3.2-01, Figures 4.9-01 and 4.9-03) and has concluded that depletions are small relative to typical surface flows upstream of the Confluence Aquatic Habitat Area. SMC are not required for those areas because UVRGA has concluded that the small depletions do not cause significant and unreasonable effects. For the Confluence Aquatic Habitat Area, it is unclear if depletions cause significant and unreasonable effects and monitoring is proposed to answer that question. For Foster Park, the minimum thresholds are based on the current best available science, which is the site-specific study by Padre (Hopkins 2013). Neither the CDFW flow recommendations nor the NMFS draft BO identify a threshold for significant and unreasonable effects based on groundwater pumping, while such a threshold is established in the Padre study. The CDFW study and BO include surface flow recommendations or requirements, respectively, to maintain beneficial habitat conditions for steelhead, which are not indicative of significant and unreasonable effects. Although the UVRGA agrees that maintaining beneficial surface water habitat conditions is important to the health of aquatic species and their habitats including steelhead, SGMA does not require GSAs to maintain surface water conditions for riverine species, but rather to manage significant and unreasonable effects related to groundwater pumping.</p>
16	18-Jun-21, 08-Oct-21	Paul	Jenkin	pjenkin@surfrider.org		Surfrider Foundation		<p>Implications for the UVR Groundwater Sustainability Plan According to the Brownstein Water Group, the Cuyama Valley Basin and the Paso Robles Area Subbasin GSPs were recently deemed incomplete for deficiencies in their definitions of sustainable management criteria (SMC), including minimum thresholds and undesirable results. Some of the concerns cited by DWR are that the GSP; <ul style="list-style-type: none"> • <i>provides insufficient detail for how it determined that the selected minimum thresholds . . . are consistent with avoiding undesirable results</i> • <i>does not relate different minimum thresholds for different portions of the basin to conditions that could cause undesirable results</i> • <i>does not sufficiently discuss expected impacts and therefore “precludes meaningful disclosure to, and participation by, interested parties and residents in the Basin.</i> It is clear from these recent DWR determinations that much more work is needed to develop and present a clear understanding of the workings of the Upper Ventura River Groundwater Basin, the potential impacts from groundwater pumping, and a plan to better manage the limited resource to ensure future sustainability and a healthy ecosystem.</p>	<p>UVRGA does not agree with the conclusion that shortcomings of other GSAs necessarily means that much more work is needed by UVRGA. UVRGA reviewed the Paso Robles and Cuyama GSPs during its GSP development process and previously identified many of the same issues raised by DWR in its review. UVRGA has been developing the GSP with that understanding in mind and is making every effort to provide sufficient detail for minimum threshold determinations, to clearly relate minimum thresholds to site-specific conditions that might cause undesirable results, and to involve all stakeholders and interested parties in the GSP development process.</p>

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17	18-Jun-21, 08-Oct-21	Paul	Jenkin	pjenkin@surfrider.org		Surfrider Foundation		<p>Recommendation: The primary storage within the Upper Ventura River Groundwater Basin lies beneath the floodplain of the Robles reach of the Ventura River. Further analysis is needed to develop a meaningful assessment of the impact of groundwater pumping on surface flows in the Ventura River. This should include contour mapping as described in the TNC Guidance documents as well as a plan to install monitoring wells to better characterize the depth to groundwater and connectivity throughout the basin, especially through the Robles reach where the majority of pumping takes place. It is clear that this will be necessary to successfully develop the Groundwater Sustainability Plan to a level that satisfies the objectives of the Sustainable Groundwater Management Act (SGMA) in order to gain the support of local stakeholders and approval by the California Department of Water Resources.</p>	<p>UVRGA believes the assessment it has performed for the GSP adequately characterizes the impact of groundwater pumping on surface water flows in the Ventura River. The analysis of Depletion of Interconnected Surface Water (Appendix N and GSP text Sections 3.2.6 and 4.9) meets or exceeds SGMA requirements (§354.28(c)(6)). We encourage the commentor to review the summary of streamflows and streamflow depletions for different reaches of the Ventura River in Table 3.2-01 of the GSP. This table and the corresponding text in Section 3.2.6 of the GSP provides an in-depth assessment of groundwater-surface water interactions and the effects of pumping in the Basin.</p> <p>While the draft Riparian GDE Memo (Appendix O) provides a discussion and results of the depth to water and rooting depth analysis, UVRGA understands that groundwater level contour maps can help the commentor and other readers understand the relationships between the plant rooting depths and depth to groundwater. As such, contour maps based on the UVRGA numerical model outputs for each of the hydrologic conditions analyzed in the Riparian GDE Memo (wet high and low, average high and low, dry high and low) will be included in the Final Riparian GDE Memo.</p>
18	4-Sep-21	Edward	Johnson	-	n/a	n/a	1.0 Introduction	What are the short and long-term mitigation measures that will be applied, if any, to de minimis use (<2 AF/yr) domestic wells owners if/when a maximum or minimum impact standard is reached in the relevant aquifer zone (Santa Ana, Mira Monte/Meiners Oaks, Casitas Springs, etc.)?	UVRGA does not anticipate regulating de minimis wells at this time.
19	8-Oct-21	Jennifer	Tribo	jtribo@cityofventura.ca.gov	n/a	City of Ventura		Various edits	All requested edits were made.
20		Bert	Rapp		n/a	Ventura River Water District		Various edits	All requested edits were made.
21		Bert	Rapp			Ventura River Water District		Is the groundwater quality influenced by leaching nutrients from the Monterey formation?	UVRGA provided additional text in GSP Section 3.1.3.3, "the Monterey formation is a documented source of nitrate (Las Virgenes Water District Nitrate Study < https://www.lvmwd.com/Home/ShowDocument?id=2273 >) and will be further evaluated as needed during GSP implementation."
22		Bert	Rapp	-		Ventura River Water District		Does Ventura County have results from their recent nitrate sampling study?	UVRGA is not aware of the available data from this study, but will continue to seek available data as needed during GSP implementation.
23	5-Oct-21	Erin Steven	Wilson-Olgin Slack	Steven.Slack@wildlife.ca.gov	(858) 467-4201	CDFW 3883 Ruffin Road San Diego, CA 92123	Section 4.1, starting on p. 92	<p>Comment #1: Data Gaps Exist in the Hydrologic Conceptual Model (HCM) Issue: CDFW appreciates the efforts the UVRGA undertook to analyze the Basin's geologic and hydrogeologic characteristics. CDFW also appreciates UVRGA's proposed plans to utilize the updated HCM to fill in the data gaps and deficiencies identified in the Draft GSP. However, CDFW's understanding is that the Draft GSP does not account for the wide range of hydraulic connectivity and transmissivity values across the Basin, nor does it set forth a reasonable pathway to address gaps in the data sets for these values. For example, the draft plans of the HCM for Sections 3.1 and 3.2 stated that some of the aquifer information was obtained from available driller logs and short-term pumping tests, which are not likely to provide a complete and accurate data set for assessing aquifer parameters. Recommendation #1: Accurate hydrogeologic modeling requires an accurate and complete data set. CDFW recommends that the GSA expand the area in which it is assessing hydraulic connectivity and transmissivity values to ensure the model contains representative conditions across the Basin. Furthermore, the GSA should consider well data with adequate construction and accurate aquifer testing information in its analysis to ensure accurate characterization of hydrogeologic conditions. The Draft GSP should also provide specific model details such as hydraulic connectivity and transmissivity values across the Basin to evaluate the accuracy of the results.</p>	<p>UVRGA assessed the entire Basin and considered all available data when characterizing hydrogeologic conditions.</p> <p>Appendix H provides details concerning the numerical model.</p>

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24	5-Oct-21	Erin Steven	Wilson- Olgin Slack	Steven.Slack@wildlife.ca.gov	(858) 467-4201	CDFW 3883 Ruffin Road San Diego, CA 92123	Section 3.2.7.2.1, starting on p. 66 and Appendix O	<p>Comment #2: The GSP Does Not Consider All Riparian Groundwater Dependent Ecosystems in the Basin</p> <p>Issue: the Draft GSP concludes that only two of the mapped iGDE areas are GDEs subject to SGMA requirements and only provides for monitoring of groundwater levels and vegetative health in these two areas. The GSA concludes that iGDEs containing coast live oaks in the Mira Monte/Meiners Oaks and Terrace Areas do not qualify as GDEs.</p> <p>If hydrologic connectivity exists between a terrestrial or aquatic ecosystem and groundwater, then that ecosystem is a potential GDE and must be identified in a GSP. (23 CCR § 354.16 (g).) Therefore, hydrologic connectivity between surface water and groundwater, as well as groundwater accessibility to terrestrial vegetation, must be evaluated carefully. Accurate identification and consideration of GDEs is also essential to assess whether the GSA has complied with the requirement to avoid significant and unreasonable adverse impacts to beneficial uses of surface water, including aquatic ecosystems reliant on interconnected surface water. (Water Code § 10721(x)(6).)</p> <p>Recommendation #2(a): CDFW recommends the final GSP provide a more detailed assessment of the eight areas within the Basin that were mapped as iGDEs to determine whether they qualify as GDEs. Conclusions regarding the presence of GDEs needs to be well supported. CDFW also recommends considering best available GDEs-related data and information when conducting this analysis. Specifically, the GSA should consider the best scientific data on depth to groundwater in its analysis of ISWs, USGS data on mapped springs/seeps, and a comparison of recent groundwater level contours to vegetation root zones. CDFW believes the shallow perched aquifer and shallow alluvial aquifer, although rarely used for water supply, likely support GDEs and should be analyzed further in the Draft GSP. Groundwater within the shallow perched and alluvial aquifers is likely critical to supporting “ecological communities or species” within the Basin. (23 CCR § 351(m).) CDFW recommends using Normalized Difference Vegetation Index (NDVI) and Normalized Difference Moisture Index (NDMI) to assess habitat health for all eight iGDE areas on an annual basis.</p> <p>Recommendation #2(b): If the GSA’s revised analysis indicates that additional iGDEs qualify as GDEs under SGMA, the Draft GSP’s sustainable management criteria should be revised to facilitate appropriate and timely monitoring and management response actions for all beneficial users within or supported by these GDEs. These GDEs should be monitored for groundwater levels and vegetative health to account for and mitigate potential adverse impacts to these GDEs from new production wells or expanded production from existing wells. The Draft GSP states that in non-drought periods, the Basin can fill up on the “order of two out of every three years and significant surface water base flow is sustained by rising groundwater in the southern part of the basin” (p. 31). This “flashy” behavior can provide recharge for the shallow alluvial aquifer and perched zones that may support GDEs. Considering this interconnection, GDEs should be carefully monitored, and groundwater pumping should be responsibly managed to avoid damaging consequences to GDEs.</p>	<p>UVRGA has complied with the GSP Emergency Regulations requirement to identify and consider GDEs. The NCCAG dataset used as a starting point for the GDE analysis includes mapped springs and seeps as iGDEs. Modeled groundwater depths (based on the best available groundwater data for the entire Basin) were compared with maximum rooting depths for dominant plant species within all iGDEs in the Basin. UVRGA carefully considered whether the iGDEs are actual GDEs, and reasons for screening out particular iGDEs are described in detail in the Section 2.3 of the Riparian GDE Memo.</p> <p>Furthermore, SGMA only requires management of groundwater that is affected by pumping within the Basin. Shallow or perched aquifers are not connected to the primary aquifer and are not impacted by pumping.</p>
25	5-Oct-21	Continued from above					Section 3.2.7.2.1, starting on p. 66 and Appendix O	<p>Recommendation #2(c): CDFW does not recommend relying solely on soils information to assess the presence of GDEs. For example, the presence of sandy, dry, and friable soils does not mean that existing plant species do not rely on groundwater for some portion of their life cycle. Capillary fringe associated with root networks from native plants could be accessing groundwater from deeper depths.</p> <p>Recommendation #2(d): CDFW recommends the final GSP develop sustainable management criteria for all areas of ISWs and GDEs within the Upper Ventura River Basin GSP.</p>	<p>UVRGA's GDE evaluation did not rely on soils information to assess the presence of GDEs. This comment does not appear to be applicable to this GSP.</p> <p>The chronic lowering of GW levels SMC apply throughout the entire Basin. SMC for depletion of ISW were developed for the area where UVRGA identified the potential for significant and unreasonable depletion.</p>

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26	5-Oct-21	Erin Steven	Wilson-Olgin Slack	Steven.Slack@wildlife.ca.gov	(858) 467-4201	CDFW 3883 Ruffin Road San Diego, CA 92123	Page – ES-xiv Pg. 129	<p>Comment #4: The GSP Minimum Thresholds and Measurable Objectives for Interconnected Surface Waters Depletion Do Not Account for the Best Available Science</p> <p>Issue: The Draft GSP relies on the Hopkins Study (2013) and Padre Study (2012) to establish minimum thresholds and measurable objectives for the depletion of ISWs in the Foster Park Habitat Area. The Draft GSP indicates that CDFW's Draft Instream Flow Recommendations (2021) (Draft Recommendations) and National Marine Fisheries Service (NMFS) Draft Biological Opinion for Foster Park Wellfield (2007) (Foster Park Draft BO) are not on point for this analysis because they do not identify a threshold for significant and unreasonable effects based on groundwater pumping, but rather contain "surface flow recommendations or requirements to maintain optimal habitat conditions for steelhead." (p.129.)</p> <p>CDFW believes that the Draft GSP mischaracterizes CDFW's Draft Recommendations and the Foster Park Draft BO as protecting only "optimal" conditions for steelhead. CDFW also disagrees that the Draft Recommendations and Foster Park Draft BO are not relevant to determining appropriate sustainability criteria to avoid unreasonable adverse impacts to beneficial users of ISWs. The CDFW Draft Recommendations were designed to protect the federal Endangered Species Act (FESA) listed Southern California steelhead (<i>Oncorhynchus mykiss</i>; Steelhead) passage and habitat for spawning and rearing, as well as supporting ecological function in the lower Ventura River. CDFW's Lower Ventura Draft Recommendations were largely based on direct measurements and modeling of site-specific flow and habitat conditions, particularly in the summer months. Groundwater pumping has the potential to drawdown surface flows, which may lead to inadequate depths for Steelhead passage or reduced habitat for steelhead spawning and rearing. This draw-down may constitute a significant and unreasonable effect on beneficial users, including Steelhead.</p> <p>Recommendation #4(a): CDFW recommends that the Draft GSP utilize the best available information and science to develop appropriate minimum thresholds and measurable objectives for ISW depletion. Specifically, CDFW recommends that the UVRGA account for CDFW's Draft Recommendations and any subsequent updates to this document. CDFW's Draft Recommendations encompass the areas identified in the Draft GSP as Casitas Springs Area (known as Ventura Reaches 3 & 4 in CDFW's Draft Recommendations). CDFW's Draft Recommendations represent the best available science regarding flows needed to support a range of life stage needs for Steelhead, including the following:</p> <ul style="list-style-type: none"> - Passage and habitat during the spawning season from December to May - Low-flow habitat from June to October - Fall pulse flows in October through December and varying peak flows from January through May. Thus, the Draft Recommendations should be used to inform the development of sustainable management criteria needed to avoid ISW depletions that may have significant and unreasonable effects on Steelhead and other beneficial users, as required under SGMA. 	<p>The CDFW instream flow recommendations (CDFW 2021a) and the NMFS Draft BO (NMFS 2007) provide surface flow recommendations and requirements, respectively, to maintain beneficial habitat conditions for steelhead within portions of the Ventura River. While these flows may provide beneficial conditions for steelhead, they do not represent the minimum threshold below which significant and unreasonable impacts to steelhead would occur due to the depletion of ISW due to pumping, as is required by SGMA.</p> <p>The UVRGA agrees with maintaining surface water conditions for the health and survival of aquatic species and their habitats, including steelhead. However, SGMA does not require the UVRGA to maintain surface water conditions for riverine species, but rather to manage significant and unreasonable effects related to groundwater pumping.</p> <p>The UVRGA has taken the CDFW and NMFS recommendations into account but believes that the flow study conducted by Padre (2013) on behalf of the City of Ventura provides the most relevant data for developing thresholds for significant and unreasonable effects of groundwater pumping in the Foster Park Habitat Area, as required by SGMA.</p>
27	5-Oct-21	Continued from above					Page – ES-xiv Pg. 129	<p>Recommendation #4(b): The Foster Park Draft BO recommends a minimum maintenance flow of 11-12 cfs at the Foster Park gage (USGS 1118500) to allow for improved growth and survival of juvenile Steelhead. Although the Foster Park Draft BO has not yet been imposed as a binding regulatory requirement in the Ventura River, its scientific information can still be relevant to understanding current environmental circumstances and conditions. CDFW recommends that the final GSP consider NMFS's recommended minimum maintenance flow of 11-12 cfs at the Foster Park gage when establishing thresholds to avoid significant and unreasonable ISW depletions.</p>	See response to comment 26 above.

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28	5-Oct-21	Erin Steven	Wilson- Olgin Slack	Steven.Slack@wildlife.ca.gov	(858) 467-4201	CDFW 3883 Ruffin Road San Diego, CA 92123		<p>Comment #5: Evaluation of Multiple Minimum Thresholds</p> <p>Issue: According to UVRGA, the Evaluation of Multiple Minimum Thresholds (23 CCR §354.26(c)) is not applicable because only one minimum threshold is established for the ISW depletions sustainability indicator. CDFW disagrees with this conclusion. Because multiple areas within the Basin have ISWs, it is appropriate to have more than one minimum threshold for the ISW sustainability indicator. Areas of ISWs that overlap with GDEs support various fish and wildlife resources. The Upper Ventura River is designated critical habitat for Steelhead and contains important Steelhead spawning and rearing habitat in Southern California. Species including Steelhead, the FESA-listed and California Endangered Species Act (CESA) listed least Bell's vireo (<i>Vireo bellii pusillus</i>), and the FESA- and CESA-listed southwestern willow flycatcher (<i>Empidonax traillii extimus</i>) utilize the various habitats identified in the draft GSP as wetland and riverine features.</p> <p>Steelhead have a range of life cycle needs that require multiple minimum thresholds. Excessively high-water temperatures in the spring, summer, and early fall reduce available juvenile Steelhead rearing habitat. Low flows in the fall and winter can delay adult Steelhead passage to critical spawning areas. Steelhead also need passage flows during the spawning season of December-May, ecological baseflows for the low flow months of June-October, and Steelhead habitat optimum flows for the transition month of November. Multiple minimums thresholds throughout the year are needed to provide monthly flows to support Steelhead.</p> <p>Recommendation #5(a): CDFW proposes that the final GSP incorporate Recommendations #4(a) and #4(b).</p>	See responses to comment 26 above.
29	5-Oct-21	Continued from above						<p>Recommendation #5(b): The NMFS 2007 BO for the Robles Diversion Fish Passage Facility (Robles Diversion BO) states that during the fish passage augmentation season (January 1-June 30), bypass flows of at least 30 cfs are required at the Robles Diversion. The Robles Diversion BO also states that "the minimum flow rate providing successful steelhead migration through the lower river is 50 cfs. Therefore, downstream released flows at the diversion must be maintained at or above 50 cfs during the first 10 days of each migratory storm event (i.e., storms generating flows 150 cfs or greater, as measured at the Robles Diversion)" (p. 7). To augment these stream flows, "storm events during the months of January through June are considered potential migration events if the resulting peak discharge rate (a) exceeds 149 cfs as measured at the Robles Diversion, and (b) results in at least double the flow of any of the three days preceding the storm peak" (p. 6). Steelhead take is not anticipated with the minimum 30-50 cfs recommended by NMFS. CDFW recommends the GSA consider NMFS's recommendation of minimum flows of 30-50 cfs at the Robles Diversion Facility when developing minimum thresholds and measurable objectives to avoid ISW depletions that would have significant and unreasonable adverse impacts on Steelhead and other beneficial users of surface water.</p>	Depletion of streamflow during migration was estimated using the numerical model. The estimated depletions of flow due to pumping during and following storm events are so small as to not be considered significant and unreasonable. Median depletion rates modeled by the UVRGA numerical model were less than 0.5 cfs for the majority of the year at the Robles Habitat Area (located downstream of the Robles Diversion). The requirements of the BO will be met through continued implementation of the necessary bypass flows by Casitas Municipal Water District.
30	5-Oct-21	Continued from above						<p>Recommendation #5(c): On August 31, 2021, the State Water Resources Control Board (SWRCB) released a Preliminary Draft version of the Groundwater-Surface Water Model of the Ventura River Watershed. This integrated groundwater-surface water model quantifies the relationship between surface flow, subsurface flow, and instream flow requirements in the Ventura River, including areas within the Basin. CDFW recommends incorporating the model's data and simulation results into the final GSP.</p>	The SWRCB model was not available for consideration during GSP development. UVRGA created a higher resolution numerical model of the Basin which was used for GSP development. UVRGA considers its model the best available science for GSP development. Having said that, UVRGA intends to evaluate the utility of using both models together for future GSP assessments and updates (the SWRCB Board model for regional inputs the UVRGA model for improved resolution along the Ventura River). This approach will take advantage of the strengths of each model.

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31	5-Oct-21	Erin Steven	Wilson- Olgin Slack	Steven.Slack@wildlife.ca.gov	(858) 467-4201	CDFW 3883 Ruffin Road San Diego, CA 92123		<p>Comment #6: Additional Sensitive Species and Habitats Proper management of both shallow and deep groundwater pumping combined with reduced surface water pumping and diverting would ensure that beneficial users in the Basin are not negatively impacted. Unsustainable use of groundwater can impact the shallow aquifers and ISWs on which species and GDEs rely, potentially resulting in adverse impacts to fish and wildlife. Determining the relationship between groundwater levels and surface water flows in the Basin will inform how the groundwater levels may be associated with the health and abundance of riparian vegetation. Poorly managed groundwater pumping and ISW flows have the potential to reduce the abundance and quality of riparian vegetation, reducing the amount of shade provided by the vegetation, and ultimately leading to increased water temperatures in the Basin. Additionally, shallow groundwater levels near interconnected surface waters should be monitored to ensure that groundwater use is not depleting ISWs and adversely affecting fish and wildlife resources in the Basin.</p> <p>Recommendation #6(a): CDFW proposes that the final GSP incorporate Recommendation 2(a), 2(b), 2(c), and 2(d) to ensure these species would have their habitats protected into the future. CDFW believes shallow perched aquifers, intermittent surface flows and shallow alluvial aquifers, although rarely used for consumptive water supply, are extremely important to the ecological communities or species that depend on groundwater emerging from all aquifers or from groundwater occurring near the surface within the Basin.</p>	See responses to comment 26 above.
32	5-Oct-21	Continued from above						<p>Recommendation #6(b): CDFW recommends that the UVRGA commit to Arundo (Arundo donax) removal in the Upper Ventura River within the Basin to improve groundwater supply and enhance habitat quality for nesting birds. Arundo removal is one example of a project and management action to minimize groundwater overdraft. If groundwater depletion results in reduced streamflow due to ISWs, the nesting and foraging success of the SSC yellow warbler (<i>Dendroica petechia</i>), the SSC yellow breasted chat (<i>Icteria virens</i>), least Bell's vireo, southwestern willow flycatcher, and other bird species may be diminished due to reduced nesting habitat and food availability.</p>	Arundo removal will be considered in the feasibility analysis for addressing indirect depletion of ISW. Please see Section 6.4 Actions to Address Indirect Depletion of Interconnected Surface Water.
33	5-Oct-21	Erin Steven	Wilson- Olgin Slack	Steven.Slack@wildlife.ca.gov	(858) 467-4201	CDFW 3883 Ruffin Road San Diego, CA 92123		<p>CONCLUSION: CDFW appreciates the opportunity to provide input on the Draft GSP for you to consider as it continues to revise the document. As set forth above, the Draft GSP does not yet comply with the aspects of SGMA statutes and regulations related to fish and wildlife beneficial uses and users of groundwater and interconnected surface waters. CDFW has concerns about data gaps in the HCM, identification and consideration of riparian GDEs, and consideration of CDFW's draft flow recommendations released in February 2021 for the Lower Ventura River. CDFW recommends the UVRGA plan for and engage in responsible groundwater management that minimizes or avoids these impacts to the maximum extent feasible as required under applicable provisions of SGMA and the Public Trust Doctrine, and that the UVRGA address the above comments to avoid a potential 'incomplete' or 'inadequate' GSP determination, as assessed by the Department of Water Resources, for the following reasons derived from regulatory criteria for GSP evaluation:</p> <ol style="list-style-type: none"> 1. The assumptions, criteria, findings, and objectives, including the sustainability goal, undesirable results, minimum thresholds, measurable objectives, and interim milestones are not reasonable and/or not supported by the best available information and best available science. (CCR § 355.4(b)(1).) (See Comments # 1, 2, 3, 4, and 5); 2. The Draft GSP does not identify reasonable measures and schedules to eliminate data gaps (CCR § 355.4(b)(2).) (See Comments # 1, 2, and 3); 3. The sustainable management criteria and projects and management actions are not commensurate with the level of understanding of the basin setting, based on the level of uncertainty, as reflected in the Draft GSP. (CCR § 355.4(b)(3).) (See Comments # 3, 4 and 5); and, 4. The interests of the beneficial uses that are potentially affected by the use of groundwater in the basin, have not been considered. (CCR § 355.4(b)(4).) (See all comments); 	For the reasons stated in the responses to other CDFW comments, UVRGA does not agree with the conclusion that the GSP does not comply with SGMA statutes and regulations. Please see responses to comment 26 above.

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34	8-Oct-21	Ngodoo	Atume	ngos.sgma@gmail.com		NGO Consortium		Based on our review, we have significant concerns regarding the treatment of key beneficial users in the Draft GSP and consider the GSP to be insufficient under SGMA. We highlight the following findings: 1. Beneficial uses and users are not sufficiently considered in GSP development. a. Human Right to Water considerations are not sufficiently incorporated. b. Public trust resources are not sufficiently considered. c. Impacts of Minimum Thresholds, Measurable Objectives and Undesirable Results on beneficial uses and users are not sufficiently analyzed. 2. Climate change is not sufficiently considered. 3. Data gaps are not sufficiently identified and the GSP needs additional plans to eliminate them. 4. Projects and Management Actions do not sufficiently consider potential impacts or benefits to beneficial uses and users.	UVRGA does not agree with the conclusion that the GSP is insufficient under SGMA. In response to: 1a) This comment is relevant to Assembly Bill 685 and applies to DWR: §350.4(g) states, "The Department shall consider the state policy regarding the human right to water when implementing these regulations". 1b) The following text has been added to the GSP on pages ES-iv, ES-xvi, 26, 103, 104, 120, and 128: "UVRGA has considered public trust resources in development of this GSP by considering the impacts to riparian and aquatic groundwater dependent ecosystems, including endangered species therein, and by setting minimum thresholds designed to prevent undesirable results under SGMA." 1c) please see responses to comment numbers 40 and 41 below. 2) please see response to comment number 45 below. 3) please see responses to comments 46 and 47 below. 4) please see response to comment 48 below.
35	8-Oct-21	Ngodoo	Atume	ngos.sgma@gmail.com		NGO Consortium		Disadvantaged Communities and Drinking Water Users The identification of Disadvantaged Communities (DACs) and drinking water users is insufficient. RECOMMENDATIONS • Provide a map of the boundaries of the recognized DAC in the basin. Provide the population of the DAC. • Provide a map of tribal lands within the basin. • Include a map showing domestic well locations and average well depth across the basin. • Identify the sources of drinking water for DAC members, including an estimate of how many people rely on groundwater (e.g., domestic wells, state small water systems, and public water systems).	DACs areas were added to Figure 2.2-02 and 3.1-37. There are no tribal trust lands located within the basin. (Section 2.2.1). It is noted that the commenter's own maps provided in Appendix E of the comment letter demonstrate this fact. Domestic wells are shown on Figure 3.1-37. Text was added to Section 2.3.1 describing the source of drinking water in the DAC areas and estimated population that rely on groundwater.
36	8-Oct-21	Ngodoo	Atume	ngos.sgma@gmail.com		NGO Consortium		Interconnected Surface Waters The identification of Interconnected Surface Waters (ISWs) is insufficient, due to lack of supporting information provided for the ISW analysis. RECOMMENDATIONS • Describe the legend labels used on Figure 3.2-11 in the GSP text to make clear which stream segments are retained as ISWs or potential ISWs in the GSP. • Further describe the groundwater elevation data and stream flow data used in the ISW analysis. Ensure depth-to-groundwater data from multiple seasons and water year types (e.g., wet, dry, average, drought) are used to determine the range of depth and capture the variability in environmental conditions inherent in California's climate. • Overlay the stream reaches shown on Figure 3.2-11 with depth-to-groundwater contour maps to illustrate groundwater depths and the groundwater gradient near the stream reaches. Show the location of groundwater wells used in the analysis. • For the depth-to-groundwater contour maps, use the best practices presented in Attachment D. Specifically, ensure that the first step is contouring groundwater elevations, and then subtracting this layer from land surface elevations from a Digital Elevation Model (DEM) to estimate depth-to-groundwater contours across the landscape. This will provide accurate contours of depth to groundwater along streams and other land surface depressions where GDEs are commonly found. • Describe data gaps for the ISW analysis in the ISW section, in addition to the discussion in Sections 3.1.4 (Data Gaps and Uncertainty). On Figure 3.2-11, include reaches with data gaps as potential ISWs.	UVRGA does not agree with the conclusion that identification of interconnected surface waters (ISWs) is insufficient. The first sentence of Section 4.6 states that "the Ventura River is considered an interconnected stream system in the Basin, within complex surface water and groundwater interactions that vary significantly with time and location in the Basin." This statement means that UVRGA treats the entire river within the Basin as ISW. The analysis performed in support of ISW SMC development evaluated potential depletion impacts along the entire reach of the Ventura River within the Basin (Appendix N, and GSP text Sections 3.2.6 and 4.9) regardless of the classifications shown on Figure 3.2-11. The classifications shown on Figure 3.2-11 are conceptual and provided for descriptive purposes and reader context. No management decisions within the GSP are based on those classifications. The recommendations in the comment appear to be intended to provide justification for the classifications shown on Figure 3.2-11. UVRGA finds this unnecessary and not required by SGMA because the classifications are for background information only.

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37	8-Oct-21	Ngodoo	Atume	ngos.sgma@gmail.com		NGO Consortium		<p>Groundwater Dependent Ecosystems The identification of Groundwater Dependent Ecosystems (GDEs) is insufficient. The GSP took initial steps to identify and map GDEs using the Natural Communities Commonly Associated with Groundwater dataset (NC dataset) and other sources. However, we found that mapped features in the NC dataset were improperly disregarded, as described below.</p> <ul style="list-style-type: none"> • NC dataset polygons were incorrectly removed based on the assumption that they are supported by the shallow, perched water table. However, shallow aquifers that have the potential to support well development, support ecosystems, or provide baseflow to streams are principal aquifers, even if the majority of the basin's pumping is occurring in deeper principal aquifers. If there are no data to characterize groundwater conditions in the shallow principal aquifer, then the GDE should be retained as a potential GDE and data gaps reconciled in the Monitoring Network section of the GSP. • NC dataset polygons were incorrectly removed in areas adjacent to irrigated fields due to the presence of surface water. However, this removal criteria is flawed since GDEs, in addition to groundwater, can rely on multiple water sources – including shallow groundwater receiving inputs from irrigation return flow from nearby irrigated fields – simultaneously and at different temporal/spatial scales. NC dataset polygons adjacent to irrigated land can still potentially be reliant on shallow groundwater aquifers, and therefore should not be removed solely based on their proximity to irrigated fields. <p>RECOMMENDATIONS</p> <ul style="list-style-type: none"> • Describe a systematic approach for analyzing the basin's GDEs. For example, provide a map of the NC Dataset. On the map, label polygons retained, removed, or added to/from the NC dataset (include the removal reason if polygons are not considered potential GDEs, or include the data source if polygons are added). Discuss how local groundwater data was used to verify whether polygons in the NC Dataset are supported by groundwater in an aquifer. Refer to Attachment D of this letter for best practices for using local groundwater data to verify whether polygons in the NC Dataset are supported by groundwater in an aquifer. • Refer to Attachment B for more information on TNC's plant rooting depth database. Deeper thresholds are necessary for plants that have reported maximum root depths that exceed the averaged 30-ft threshold, such as valley oak (<i>Quercus lobata</i>). We recommend that the reported max rooting depth for these deeper-rooted plants be used. For example, a depth-to-groundwater threshold of 80 feet should be used instead of the 30-ft threshold, when verifying whether valley oak polygons from the NC Dataset are connected to groundwater. It is important to re-emphasize that actual rooting depth data are limited and will depend on the plant species and site-specific conditions such as soil and aquifer types, and availability to other water sources. • Provide depth-to-groundwater contour maps, noting the best practices presented in Attachment D. Specifically, ensure that the first step is contouring groundwater elevations, and then subtracting this layer from land surface elevations from a digital elevation model (DEM) to estimate depth-to-groundwater contours across the landscape. • If insufficient data are available to describe groundwater conditions within or near polygons from the NC dataset, include those polygons as "Potential GDEs" in the GSP until data gaps are reconciled in the monitoring network. 	<p>UVRGA does not agree with the conclusion that the identification of GDEs is insufficient. UVRGA performed a comprehensive characterization of potential GDEs and analysis to determine which vegetation communities within the Basin are materially dependent on groundwater for consideration in the GSP.</p> <p>Regarding perched water, potential GDEs were screened out in areas where water is perched on bedrock above the regional water table. UVRGA believes it is appropriate to screen out potential GDEs in these areas because the water is not encountered within the alluvial aquifer of the Basin, which contains the groundwater that is being managed under the GSP.</p> <p>Regarding screening out vegetation in areas adjacent to irrigated fields, UVRGA believes the visual evidence from aerial imagery clearly and convincingly demonstrates that certain potential GDE areas exist where they do because water from irrigation is available for them to utilize. UVRGA concludes that these plants are dependent on the irrigation water as their primary source of water for transpiration. Conversations with UVRGA's Agricultural Director provide further evidence for this. The Agricultural Director reported that she observed oaks near an orchard die after the orchard was abandoned and irrigation stopped. Furthermore, maximum rooting depths and groundwater levels were compared for vegetation communities in these areas and this analysis was also used when screening out potential GDEs.</p> <p>The first recommendation does not appear to be applicable to this GSP. A map of the NC Dataset (iGDEs), as well as a map of potential GDEs, within the Basin are included in the Riparian GDE Assessment Memo.</p> <p>Data from TNCs rooting depth database, modeled groundwater depths, aerial imagery, and other data sources were used to make determinations of groundwater dependence for communities within the Basin, as described in Section 2.3 of the Riparian GDE Memo. Maximum rooting depths provided in the TNC database were used for each potential GDE within the Basin. None of the maximum rooting depths for the iGDEs mapped within the Basin exceed 30.0 feet. UVRGA understands that rooting depths for individual species and communities vary widely due to site-specific conditions but has utilized values from the TNC Rooting Depth Database, as it represents the best available data.</p> <p>Regarding depth-to-groundwater contour maps, these will be added to the Riparian GDE Assessment Memo so the reader can see a presentation of the groundwater level data used to screen the potential GDEs. However, it should be noted that the actual analysis used grid-based data from the numerical model, which is superior to contours because it provides a continuous distribution of data for analysis.</p>
38	8-Oct-21	Ngodoo	Atume	ngos.sgma@gmail.com		NGO Consortium		<p>Native Vegetation and Managed Wetlands Native vegetation and managed wetlands are water use sectors that are required to be included in the water budget. The integration of native vegetation into the water budget is sufficient. We commend the GSA for including the groundwater demands of this ecosystem in the historical, current and projected water budgets. Managed wetlands are not mentioned in the GSP, so it is not known whether or not they are present in the basin.</p> <p>RECOMMENDATION</p> <ul style="list-style-type: none"> • State whether or not there are managed wetlands in the basin. If there are, ensure that their groundwater demands are included as separate line items in the historical, current, and projected water budgets. 	UVRGA is not aware of any managed wetlands in the Basin.

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39	8-Oct-21	Ngodoo	Atume	ngos.sgma@gmail.com		NGO Consortium		<p>Stakeholder Engagement during GSP development Stakeholder engagement during GSP development is insufficient. SGMA's requirement for public notice and engagement of stakeholders is not fully met by the description in the Stakeholder Engagement Plan of the GSP (Appendix E). The GSP describes outreach to DAC members and environmental stakeholders in the basin. Outreach to these members includes representation of DAC and environmental stakeholders on the GSA's Board of Directors, reserving seats on the Stakeholder Advisory Committee for domestic well owners, newsletters and emails to the interested parties list, social media posts, telephone communications with stakeholders, updates given to the Ventura River Watershed Council, public notices, newspaper articles, and direct outreach to DAC members of the Casitas Springs community. An Ad Hoc Stakeholder Engagement Committee was also formed throughout the GSP process to actively seek input across stakeholders. However, we note the following deficiency with the overall stakeholder engagement process. While tribal stakeholders are mentioned, there is no documentation of tribal consultation to ensure participation in GSP development and implementation processes.</p> <p>RECOMMENDATION</p> <ul style="list-style-type: none"> • In the Stakeholder Engagement Plan, describe active and targeted consultation with tribal governments within the basin during the remainder of the GSP development process and throughout the GSP implementation phase. Refer to Attachment B for guidance on how to consult with tribal governments. 	This comment does not appear to be applicable to this GSP. There are no tribal trust lands located within the Basin. (Section 2.2.1). It is noted that the commenter's own maps provided in Appendix E of the comment letter demonstrate this fact.
40	8-Oct-21	Ngodoo	Atume	ngos.sgma@gmail.com		NGO Consortium		<p>The consideration of beneficial uses and users when establishing sustainable management criteria (SMC) is insufficient. The consideration of potential impacts on all beneficial users of groundwater in the basin are required when defining undesirable results and establishing 4 minimum thresholds^{5,6}</p> <p>Disadvantaged Communities and Drinking Water Users For chronic lowering of groundwater levels, the GSP mentions impacts to drinking water users when defining undesirable results. The GSP does not, however, analyze direct and indirect impacts on DACs or tribes when defining undesirable results, or evaluate the cumulative or indirect impacts of proposed minimum thresholds on these stakeholders.</p> <p>The GSP starts the degraded water quality SMC section of the GSP with the statement (p. 112): "Significant changes to the degraded water quality SMC are expected before GSP Adoption." The GSP identifies constituents of concern (COCs) in the basin as the following: nitrate, TDS, sulfate, chloride, and boron. The GSP states (p. 116): "The minimum thresholds [Table 4.7-01] were selected to be consistent with protection of human health (MCL for nitrate), the Upper Consumer Acceptance Levels (TDS and sulfate), and concentrations that are considered to represent toxicity thresholds for agricultural beneficial uses (chloride and boron)."</p> <p>The GSP only includes a very general discussion of impacts to drinking water users when defining undesirable results and evaluating the cumulative or indirect impacts of proposed minimum thresholds. The GSP does not, however, mention or discuss direct and indirect impacts on DACs or tribes when defining undesirable results for degraded water quality, nor does it evaluate the cumulative or indirect impacts of proposed minimum thresholds on these stakeholders.</p>	<p>UVRGA does not agree the consideration of beneficial uses and users in the SMC formulation is insufficient.</p> <p>The chronic lowering of groundwater levels minimum thresholds were selected specifically to protect all wells, including domestic wells in DAC areas. The discussion of water quality impacts includes discussion of domestic wells, which includes wells in the DAC area.</p> <p>There are no tribal trust lands located in the Basin; so, this part of the comment is not applicable. It is noted that the commenter's own maps provided in Appendix E of the comment letter demonstrate this fact.</p>
41	8-Oct-21	Ngodoo	Atume	ngos.sgma@gmail.com		NGO Consortium		<p>RECOMMENDATIONS</p> <p>Chronic Lowering of Groundwater Levels</p> <ul style="list-style-type: none"> • Describe direct and indirect impacts on DACs, drinking water users, and tribes when describing undesirable results for chronic lowering of groundwater levels. • Consider and evaluate the impacts of selected minimum thresholds and measurable objectives on DACs, drinking water users, and tribes within the basin. Further describe the impact of passing the minimum threshold for these users. For example, provide the number of domestic wells that would be de-watered at the minimum threshold. 	<p>The potential impacts are described in Section 4.4.1. Impacts described for domestic wells are inclusive of wells in DAC areas.</p> <p>The impact of the minimum thresholds is presented in Section 4.4.2.4 for all wells, which is inclusive of wells in DAC areas.</p>

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42	8-Oct-21	Ngodoo	Atume	ngos.sgma@gmail.com		NGO Consortium		<p>Degraded Water Quality</p> <ul style="list-style-type: none"> • Provide an updated Section 4.7 (Degraded Water Quality) for public comment before GSP adoption. • Describe direct and indirect impacts on DACs, drinking water users, and tribes when defining undesirable results for degraded water quality. For specific guidance on how to consider these users, refer to “Guide to Protecting Water Quality Under the Sustainable Groundwater Management Act.”⁷ • Evaluate the cumulative or indirect impacts of proposed minimum thresholds for degraded water quality on DACs, drinking water users, and tribes. 	<p>The updated section 4.7 was provided for review prior to GSP adoption.</p> <p>The potential impacts are described in Section 4.7.1. Impacts described for domestic wells are inclusive of wells in DAC areas.</p> <p>The impact of the minimum thresholds is presented in Section 4.7.2.4 for all wells, which is inclusive of wells in DAC areas</p>
43	8-Oct-21	Ngodoo	Atume	ngos.sgma@gmail.com		NGO Consortium		<p>Groundwater Dependent Ecosystems and Interconnected Surface Waters</p> <p>Despite acknowledging the impacts of drought-level groundwater elevations on GDEs, the GSP appears to disregard these impacts when setting the minimum thresholds to the historical low groundwater levels at the representative monitoring sites.</p> <p>RECOMMENDATIONS</p> <ul style="list-style-type: none"> • Reevaluate the minimum thresholds for impacts to GDEs for the chronic lowering of groundwater level SMC. Set minimum thresholds to levels that avoid ‘significant and unreasonable’ effects on beneficial users. Potential impacts on environmental beneficial uses and users need to be considered when defining undesirable results⁸ in the basin. Defining undesirable results is the crucial first step before the minimum thresholds⁹ can be determined. 	<p>The GSP does not ignore the impacts of drought-level groundwater elevation on GDEs. The UVRGA considered those impacts based on historical data, including NDVI/NDMI data, groundwater level data, and aerial imagery. While NDVI/NDMI values fell during periods with drought-level groundwater elevations, those indices also rebounded following subsequent wet years when groundwater elevations rose. Thus, the UVRGA determined that impacts to vegetative growth during periods of historically low groundwater levels were not significant and unreasonable. The chronic lowering of groundwater level minimum thresholds are set at historical low based on the understanding that no significant and unreasonable effects were observed at historical low groundwater levels and that drawing groundwater levels below historical low levels may lead to undesirable results.</p>
44	8-Oct-21	Ngodoo	Atume	ngos.sgma@gmail.com		NGO Consortium		<p>Groundwater Dependent Ecosystems and Interconnected Surface Waters</p> <p>Two aquatic habitat areas were identified for consideration in the development of depletion of interconnected surface water SMC, Confluence Aquatic Habitat Area and Foster Park Aquatic Habitat Area. The GSP states (p. 131): “[T]here is insufficient information to assess whether depletion effects in the Confluence Aquatic Habitat Area are significant and unreasonable. SMC for the Confluence Aquatic Habitat Area cannot be evaluated until these data gaps have been addressed. The Confluence Aquatic Habitat Area will be revisited prior to the first five-year GSP assessment after addressing the data gaps.” However, preliminary SMC should be established now (instead of at the five-year update) using the best available science to avoid significant and unreasonable effects on surface water beneficial users in the basin.</p> <p>RECOMMENDATIONS</p> <ul style="list-style-type: none"> • Establish preliminary SMC for depletion of interconnected surface water for the Confluence Aquatic Habitat Area, instead of waiting for the five-year GSP update. 	<p>As discussed in the GSP, there are insufficient data to determine whether significant and unreasonable effects related to ISW depletion are occurring or may potential occur in the Confluence Aquatic Habitat Area. The potential for significant and unreasonable effects must be established prior to establishing any SMC. As such, there is no basis for SMC at this time. The GSP lays out a clear path for data collection and revisiting this issue based on review of the collected data.</p>

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45	8-Oct-21	Ngodoo	Atume	ngos.sgma@gmail.com		NGO Consortium		<p>2. Climate Change</p> <p>The SGMA statute identifies climate change as a significant threat to groundwater resources and one that must be examined and incorporated in the GSPs. The GSP Regulations¹⁰ require integration of climate change into the projected water budget to ensure that projects and management actions sufficiently account for the range of potential climate futures.</p> <p>The integration of climate change into the projected water budget is insufficient. The GSP does incorporate climate change into the projected water budget using DWR change factors for 2030 and 2070. However, the GSP does not consider multiple climate scenarios (e.g., the 2070 extremely wet and extremely dry climate scenarios) in the projected water budget. The GSP should clearly and transparently incorporate the extremely wet and dry scenarios provided by DWR into projected water budgets or select more appropriate extreme scenarios for their basins. While these extreme scenarios may have a lower likelihood of occurring, their consequences could be significant, therefore they should be included in groundwater planning.</p> <p>We acknowledge and commend the inclusion of climate change into key inputs (e.g., precipitation, evaporation, and surface water flow) of the projected water budget. The sustainable yield is calculated based on the projected pumping with climate change incorporated. However, if the water budgets are incomplete, including the omission of extremely wet and dry scenarios, then there is increased uncertainty in virtually every subsequent calculation used to plan for projects, derive measurable objectives, and set minimum thresholds. Plans that do not adequately include climate change projections may underestimate future impacts on vulnerable beneficial users of groundwater such as ecosystems, DACs, and domestic well owners.</p> <p>RECOMMENDATIONS</p> <ul style="list-style-type: none"> • Integrate climate change, including extremely wet and dry scenarios, into all elements of the projected water budget to form the basis for development of sustainable management criteria and projects and management actions. • Incorporate climate change scenarios into projects and management actions. 	<p>SGMA regulations §354.18(c)(3)(A),(d)(3),(e) are covered in the Water Budget section 3.3 which provides climate change impacts for historical, current, and projected quantities. The extremely dry/wet climate change scenarios are "recommended", but not "required" per SGMA regulations and BMP (Climate Change Guidance) and the Draft GSP included the DWR-provided scenarios (see Section 3.3). Furthermore, the relative insensitivity of the calculated water budget components to the climate change scenarios (e.g., the 2070 scenario) included in the Draft GSP indicates that a similar insensitivity would be observed under the extremely dry/wet scenarios and would therefore not be informative. UVRGA will assess the need for additional uncertainty analysis for climate change impacts every 5 years.</p>
46	8-Oct-21	Ngodoo	Atume	ngos.sgma@gmail.com		NGO Consortium		<p>3. Data Gaps</p> <p>The consideration of beneficial users when establishing monitoring networks is insufficient, due to lack of specific plans to increase the Representative Monitoring Sites (RMSs) in the monitoring network that represent groundwater quality around DACs and domestic wells in the basin. The GSP states (p. 161): "No representative monitoring sites have been identified for the degraded water quality sustainability indicator. However, it is noted for clarification that four well groups have been established to address the four sets of closely spaced wells in the groundwater quality monitoring network (Table 5.6-01 and Figure 5.6-01). These sets of closely spaced wells are grouped (i.e., treated as a single well) for the purposes of implementing the measurable objectives and minimum thresholds for the degraded water quality sustainability indicator, as discussed in Section 4.7.1." The GSP does not explain how the use of a well group to represent a RMS will satisfy the reporting requirements of SGMA, however, Figure 5.6-01 (Existing and Planned Water Quality Monitoring Network) shows that no monitoring wells are located across portions of the basin near DACs and domestic wells (see maps provided in Attachment E). Beneficial users of groundwater may remain unprotected by the GSP without adequate monitoring and identification of data gaps in the shallow aquifer. The Plan therefore fails to meet SGMA's requirements for the monitoring network¹¹.</p> <p>RECOMMENDATIONS</p> <ul style="list-style-type: none"> • Provide maps that overlay monitoring well locations with the locations of DACs and domestic wells to clearly identify potentially impacted areas. Increase the number of representative monitoring sites (RMSs) in the shallow aquifer across the basin for the groundwater quality condition indicator. Prioritize proximity to DACs and drinking water users when identifying new RMSs. • Choose single wells for water quality RMSs, instead of using well groups. If well groups are used, explain how the reporting requirements of SGMA will be met. 	<p>UVRGA does not agree with the conclusion that consideration of beneficial users in the monitoring networks is insufficient. The commenter claims that "no monitoring wells are located across portions of the basin near DACs and domestic wells." The commenter's own maps provided with the comments show that this is not the case. There is adequate coverage in the Casitas Springs Area, including Well Group 4 that addresses the DAC area. There is adequate monitoring in the Kennedy Area. Proposed Monitoring Site E will address the current lack of monitoring in the Santa Ana Area (Section 5.3.4). It is noted that the monitoring network does not include monitoring sites in the Terraces Area and eastern portion of the Mira Monte / Meiners Oaks Area because wells in these areas are believed to be screened in bedrock formations beneath the basin (Section 5.3.1). UVRGA is required to assess the monitoring networks as part of GSP implementation and the required periodic GSP assessment process. Information developed from implementation of the Section 6.2 Domestic Well Survey management action will be used to further assess potential effects and monitoring needs for domestic wells, including wells in DAC areas. The first five-year GSP assessment will consider this information and the GSP will be updated as appropriate, including potential modifications to the monitoring networks. DACs areas were added to Figure 5.6-01. Concerning the comments about well groups, UVRGA believes the GSP text adequately describes how the well group approach will meet SGMA requirements (§354.34(c)(4); §354.36(a),(c)). The text in Section 5.9 has been enhanced to further demonstrate the SGMA requirements are met.</p>

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47	8-Oct-21	Ngodoo	Atume	ngos.sgma@gmail.com		NGO Consortium		<p>3. Data Gaps The consideration of beneficial users when establishing monitoring networks is insufficient, due to lack of specific plans to increase the Representative Monitoring Sites (RMSs) in the monitoring network that represent groundwater quality around DACs and domestic wells in the basin. The GSP provides discussion of data gaps for GDEs and ISWs in Section 5.3.4 of the GSP (Assessment and Improvement of Monitoring Network) and provides planned monitoring well locations on Figure 5.3-01 (Existing and Planned Groundwater Level Monitoring Wells). The GSP could be improved by describing the aquatic GDE monitoring programs for the Foster Park and Confluence Aquatic Habitat Areas (p. 159) and how they will be used to assess the potential for significant and unreasonable impacts to GDEs and ISWs due to groundwater conditions in the basin. RECOMMENDATIONS</p> <ul style="list-style-type: none"> • Further describe the biological monitoring that can be used to assess the potential for significant and unreasonable impacts to GDEs or ISWs due to groundwater conditions in the basin. The aquatic GDE monitoring programs for the Foster Park and Confluence Aquatic Habitat Areas are mentioned on p. 159 but no further details are provided. 	As stated in the applicable sections, study plans / monitoring plans will be developed for these monitoring programs during GSP implementation.
48	8-Oct-21	Ngodoo	Atume	ngos.sgma@gmail.com		NGO Consortium		<p>4. Addressing Beneficial Users in Projects and Management Actions The consideration of beneficial users when developing projects and management actions is insufficient, due to the failure to identify benefits or impacts of identified projects and management actions to beneficial users of groundwater such as DACs and tribes. The GSP includes two projects and management actions with explicit benefits to the environment (Foster Park Protocols to Address Direct Depletion of Interconnected Surface Water and Actions to Address Indirect Depletion of Interconnected Surface Water). The only other project included in the GSP is a Domestic Well Survey to collect more information about domestic wells in the basin. The GSP does not discuss the manner in which DACs and tribes may be benefitted or impacted by projects and management actions identified in the GSP, nor does the GSP discuss the potential water quality impacts from groundwater management in the basin. Potential project and management actions may not protect these beneficial users. Groundwater sustainability under SGMA is defined not just by sustainable yield, but by the avoidance of undesirable results for all beneficial users. RECOMMENDATIONS</p> <ul style="list-style-type: none"> • For DACs and domestic well owners, include a drinking water well impact mitigation program to proactively monitor and protect drinking water wells through GSP implementation. Refer to Attachment B for specific recommendations on how to implement a drinking water well mitigation program. • For DACs, domestic well owners, and tribes, include a discussion of whether potential impacts to water quality from projects and management actions could occur and how the GSA plans to mitigate such impacts. • Recharge ponds, reservoirs, and facilities for managed stormwater recharge can be designed as multiple-benefit projects to include elements that act functionally as wetlands and provide a benefit for wildlife and aquatic species. For guidance on how to integrate multi-benefit recharge projects into your GSP, refer to the "Multi-Benefit Recharge Project Methodology Guidance Document"12. • Develop management actions that incorporate climate and water delivery uncertainties to address future water demand and prevent future undesirable results. 	<p>UVRGA does not agree that the consideration of beneficial users with respect to projects and management actions is insufficient. The commenter claims that UVRGA has failed to identify benefits and impacts of the projects and management actions to beneficial users such as DACs and tribes. The GSP Emergency Regulations do not specifically require GSAs to identify benefits or impacts for beneficial users, let alone specific beneficial user categories. In fact, the regulations do not require discussion of impacts at all. The regulations require GSA to identify which measurable objectives will benefit (§354.44(b)(1)) and the benefits in general (§354.44(b)(5)). These requirements have been met for each project or management action included in Section 6 of the GSP.</p> <p>As stated in prior responses, there are no tribal trust lands with the Basin and the commenter's own maps show this.</p>
49	8-Oct-21	Kimball James	Loeb Maxwell	kim.loeb@ventura.org james.maxwell@ventura.org	(805) 650-4083 (805) 654-5164	Ventura County 800 S. Victoria Avenue, Ventura, CA 93009	Page ES-xi	A table such as Table 3.3.03 would be helpful to summarize demands and supplies and to provide a usage order of magnitude. It would also be helpful to provide a brief discussion of climate change assumptions (order of magnitude / %changes in precipitation / ET, etc.).	Table 3.3-03 and additional explanation of climate change uncertainty was added to the ES.
50	8-Oct-21	Kimball James	Loeb Maxwell	kim.loeb@ventura.org james.maxwell@ventura.org	(805) 650-4083 (805) 654-5164	Ventura County 800 S. Victoria Avenue, Ventura, CA 93009	Page ES-xii, Table ES-01	An explanation should be provided as to why the surface water historical total in/out (48,025-AFY) is lower than the current/projected in out (86,241/96,474-AFY).	Additional text describing the noted differences was included in the ES.

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51	8-Oct-21	Kimball James	Loeb Maxwell	kim.loeb@ventura.org james.maxwell@ventura.org	(805) 650-4083 (805) 654-5164	Ventura County 800 S. Victoria Avenue, Ventura, CA 93009	Page ES-xiv	The well on which the groundwater levels in the hydrograph shown in Fig. ES-11 should be identified.	Well name added to chart.
52	8-Oct-21	Kimball James	Loeb Maxwell	kim.loeb@ventura.org james.maxwell@ventura.org	(805) 650-4083 (805) 654-5164	Ventura County 800 S. Victoria Avenue, Ventura, CA 93009	Page ES-xxii	The Municipal and Industrial (M&I) and Agricultural (Ag) water use efficiency and Casitas Municipal Water District (CMWD) proposed projects to bridge the 5,160-AFY yield gap should be added as described in Section 6.	This comment is not consistent with the text on page ES-xxii. Therefore, the comment is unclear and cannot be addressed.
53	8-Oct-21	Kimball James	Loeb Maxwell	kim.loeb@ventura.org james.maxwell@ventura.org	(805) 650-4083 (805) 654-5164	Ventura County 800 S. Victoria Avenue, Ventura, CA 93009	Section 2.2.1	Section 2.2.1 lists the source types of water for municipal and industrial, agricultural, and domestic uses. Are there any significant stream, channel or surface water diversions contributing to water supplies (aside from the Robles Diversion and the privately owned agricultural diversion mentioned in Sections 3.1.1.2 and 4.9.1)? The Draft only lists diversions reported by the State Water Resources Control Board (SWRCB).	A SWRCB permit or license is required to divert surface water in the State of California. Therefore, it is appropriate to identify surface water sources of supply via SWRCB records. UVRGA did not attempt to identify illicit diversions that may or may not exist within the Basin.
54	8-Oct-21	Kimball James	Loeb Maxwell	kim.loeb@ventura.org james.maxwell@ventura.org	(805) 650-4083 (805) 654-5164	Ventura County 800 S. Victoria Avenue, Ventura, CA 93009	Section 2.2.2.2	Should be revised to reflect that the CMWD's 2020 Urban Water Management Plan update was completed and formally adopted.	This subject content was revised by Casitas MWD. UVRGA defers to Casitas MWD's edits.
55	8-Oct-21	Kimball James	Loeb Maxwell	kim.loeb@ventura.org james.maxwell@ventura.org	(805) 650-4083 (805) 654-5164	Ventura County 800 S. Victoria Avenue, Ventura, CA 93009	Section 2.2.2.2	Have there been any recent updates to the Regional Water Quality Control Board (RWQCB) total maximum daily loads (TMDLs) for the Ventura River and its tributaries? If so, these updates should be referenced in the text.	The GSP references the most current TMDLs.
56	8-Oct-21	Kimball James	Loeb Maxwell	kim.loeb@ventura.org james.maxwell@ventura.org	(805) 650-4083 (805) 654-5164	Ventura County 800 S. Victoria Avenue, Ventura, CA 93009	Section 2.2.3.2	It may be useful to state that that the California Well Standards Bulletins are undergoing a technical advisory committee review at the time of the GSP was prepared.	Comment noted.
57	8-Oct-21	Kimball James	Loeb Maxwell	kim.loeb@ventura.org james.maxwell@ventura.org	(805) 650-4083 (805) 654-5164	Ventura County 800 S. Victoria Avenue, Ventura, CA 93009	Section 2.3.1	A statement should be included in Section 2.3.1 that CMWD's Mira Monte well pumps less than 1% of the water supplied by CMWD.	Subject text added with 'approximate' caveat.
58	8-Oct-21	Kimball James	Loeb Maxwell	kim.loeb@ventura.org james.maxwell@ventura.org	(805) 650-4083 (805) 654-5164	Ventura County 800 S. Victoria Avenue, Ventura, CA 93009	Sections 3.1, 3.1.3.1.3 and 3.1.3.2	Despite the lower hydraulic conductivity of the Ojai Conglomerate, could this formation potentially connect any portions of the water-bearing alluvial sediments of the Upper Ventura River Valley Basin and the Ojai Valley Basin? If so, the Ojai Valley Basin could act as a source of groundwater recharge in Section 3.1.3.2.	Potential hydraulic communication between the Upper Ventura River Basin and Ojai Basin theoretically exists via the Ojai Conglomerate. However, this potential connection is considered very small due to the low hydraulic conductivity of the formation, the limited area of this formation along the boundary, and the presence of Sespe Formation at shallow depths along the basin boundary (as indicated by Sespe Formation outcrops along the basin boundary). For these reasons, the potential flow of groundwater between the basins is considered to likely be very small. Text was added to the GSP in Section 3.1.3.2 to clarify this.
59	8-Oct-21	Kimball James	Loeb Maxwell	kim.loeb@ventura.org james.maxwell@ventura.org	(805) 650-4083 (805) 654-5164	Ventura County 800 S. Victoria Avenue, Ventura, CA 93009	Appendix H	In general, there are references throughout the text to the groundwater model in Appendix H. It would be helpful to include a summary of the model in GSP text.	A summary paragraph was added to Section 3.3 Water Budget – Water Budget Overview to introduce and summarize the numerical model.
60	8-Oct-21	Kimball James	Loeb Maxwell	kim.loeb@ventura.org james.maxwell@ventura.org	(805) 650-4083 (805) 654-5164	Ventura County 800 S. Victoria Avenue, Ventura, CA 93009	Section 3.1.1.3	Section 3.1.1.3 states that water is not imported to the Ventura River Watershed. It may be appropriate to note the planned CMWD interconnect project with Carpinteria Valley Water.	Comment noted. The UVRGA Board discussed this and decided it is not appropriate to include this project in the GSP at this time based on the current status.
61	8-Oct-21	Kimball James	Loeb Maxwell	kim.loeb@ventura.org james.maxwell@ventura.org	(805) 650-4083 (805) 654-5164	Ventura County 800 S. Victoria Avenue, Ventura, CA 93009	Sections 3.1.3.3, 3.2.4 and 4.7	Sections 3.1.3.3, 3.2.4 and 4.7 discuss the elevated concentrations of nitrates in the Mira Monte/Meiners Oaks Area. It should be noted that Ventura County discretionary planning reviews consider the RWQCB Basin Plan groundwater quality objectives and groundwater beneficial uses as pertains to potential development and proposed projects.	This is now noted in Section 3.2.4.

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62	8-Oct-21	Kimball James	Loeb Maxwell	kim.loeb@ventura.org james.maxwell@ventura.org	(805) 650-4083 (805) 654-5164	Ventura County 800 S. Victoria Avenue, Ventura, CA 93009	Page 70, last paragraph	Climate change is anticipated to change the timing and duration of precipitation events and could influence the year-to-year surface and groundwater budgets. It is suggested to rephrase or acknowledge what is anticipated from climate change, but note that there is a large level of uncertainty.	Climate change effects are discussed in detail in Section 3.3.3.3.
63	8-Oct-21	Kimball James	Loeb Maxwell	kim.loeb@ventura.org james.maxwell@ventura.org	(805) 650-4083 (805) 654-5164	Ventura County 800 S. Victoria Avenue, Ventura, CA 93009	Page 77 and Table 3.3-03	While estimated Municipal and Industrial (M&I) demands have decreased over time, Agricultural (Ag) demands have stayed constant and therefore start to represent a larger portion of total demand. Discussion should be included about how this is addressed in the future water demands.	Section 3.3.3.2 describes how future agricultural water demands were projected.
64	8-Oct-21	Kimball James	Loeb Maxwell	kim.loeb@ventura.org james.maxwell@ventura.org	(805) 650-4083 (805) 654-5164	Ventura County 800 S. Victoria Avenue, Ventura, CA 93009	Table 3.3-03	Table 3.3-03 shows annual Ag demands at 505 AFY, while Table 3.3-06 has a more specific Ag pumping demand. Is the difference due to Ag surface water deliveries? This should be clarified.	505 AFY in Table 3.3-03 is the estimated agricultural irrigation demand within the Basin, which is met by a combination of groundwater and surface water. The 276 AFY in Table 3.3-06 is the estimated agricultural pumping in the Basin. Note that some of the agricultural pumped groundwater is used outside of the Basin. Footnotes will be added to the subject tables.
65	8-Oct-21	Kimball James	Loeb Maxwell	kim.loeb@ventura.org james.maxwell@ventura.org	(805) 650-4083 (805) 654-5164	Ventura County 800 S. Victoria Avenue, Ventura, CA 93009	Page 78	Reliability of Historic Surface Water Deliveries, information should be added on how CMWD estimates planned deliveries. Regarding the following text: "The surface water supply was deemed reliable because demands were less than projected for much of the historical period and the surface water supply was less than the safe yield of the reservoir, as it was understood at the time" and "the reservoir safe yield has been re-assessed to be 10,660 AF/yr for Lake Casitas (now called "safe demand"), as discussed in Sections 3.3.2 and 3.3.3.2." 1. The first sentence above is not necessarily accurate since not all of Lake Casitas water is delivered to the Upper Ventura River (UVR). If the other CMWD demands increase, UVR deliveries could potentially decrease. 2. Did the "Safe Demand" estimate incorporate the climate change effects as outlined in this Draft? What is the estimated portion to be delivered to the UVR if the supply is limited to the "Safe Demand"?	This subject content was revised by Casitas MWD. UVRGA defers to Casitas MWD's edits.
66	8-Oct-21	Kimball James	Loeb Maxwell	kim.loeb@ventura.org james.maxwell@ventura.org	(805) 650-4083 (805) 654-5164	Ventura County 800 S. Victoria Avenue, Ventura, CA 93009	Page 79, second paragraph	Clarify if stream outflows from individual streams make up 83% of the total groundwater model domain inflows.	UVRGA does not understand the comment.
67	8-Oct-21	Kimball James	Loeb Maxwell	kim.loeb@ventura.org james.maxwell@ventura.org	(805) 650-4083 (805) 654-5164	Ventura County 800 S. Victoria Avenue, Ventura, CA 93009	Page 82	Average 2006-2016 "M&I GW Supplies" of 845 AFY in Table 3.3-03 "Estimated Historical Demands and Supplies in the UVRGB by Category and Source" are much less than the average 2006-2016 "M&I Pumping" of 4,707 AFY in Table 3.3-06 "UVRGB Groundwater Inflows and Outflows by Water Year, Historical and Current Period." Is this due to M&I exports out of the basin? If so, there should be a note on Table 3.3-03 similar to the note on Ag groundwater exports. Otherwise, this discrepancy needs to be explained.	City of Ventura pumping is exported to the City of Ventura. This is discussed in Section 3.3.1.1. A footnote was added to Table 3.3-06.
68	8-Oct-21	Kimball James	Loeb Maxwell	kim.loeb@ventura.org james.maxwell@ventura.org	(805) 650-4083 (805) 654-5164	Ventura County 800 S. Victoria Avenue, Ventura, CA 93009	Pages 87-88, per Table 3.3-03	Are M&I demands appropriately estimated, given the likelihood of multiple-dry year conditions?	UVRGA does not understand the question. The question references pages 87-88, which discuss projected supplies and demands in relation to Table 3.3-03, which presents historical estimated supplies and demands.
69	8-Oct-21	Kimball James	Loeb Maxwell	kim.loeb@ventura.org james.maxwell@ventura.org	(805) 650-4083 (805) 654-5164	Ventura County 800 S. Victoria Avenue, Ventura, CA 93009	Page 88, in the last paragraph	There is a significant gap between the CMWD safe demand and project demand. What portion of the gap applies to UVR? Is the schedule to close this gap within the next 10 years overly optimistic?	This subject content was revised by Casitas MWD. UVRGA defers to Casitas MWD's edits.
70	8-Oct-21	Kimball James	Loeb Maxwell	kim.loeb@ventura.org james.maxwell@ventura.org	(805) 650-4083 (805) 654-5164	Ventura County 800 S. Victoria Avenue, Ventura, CA 93009	Page 90	Page 90 relates the conclusions from Baseline vs Climate Change. What is the frequency of ENSO/PDO events? Can it be stated that the size of the basin and its responsiveness to changes in precipitation/runoff such that the higher rain fall events of ENSO/PDO rapidly refill the basin?	The Basin is demonstrated to refill in years when Ventura River flows are approximately equal to or greater than 50% of the average annual flow (Section 4.4.3.1 and Figure 4.4-01). Therefore, higher rainfall events associated with ENSO/PDO events are not required to refill the Basin.
71	8-Oct-21	Kimball James	Loeb Maxwell	kim.loeb@ventura.org james.maxwell@ventura.org	(805) 650-4083 (805) 654-5164	Ventura County 800 S. Victoria Avenue, Ventura, CA 93009	Page 102, top paragraph	The statement "Modeling projections for the GSP suggest that the proposed minimum thresholds may be occasionally exceeded at some monitoring locations (Appendix Q). However, the criterion for undesirable results is not predicted to be triggered during the 50-year GSP implementation period" seems contradictory and potentially weakens the selection of MTs.	There is no contradiction. The GSP Emergency Regulations Section §354.26(b)(2) requires GSAs to define undesirable results as a combination of minimum threshold exceedances.

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72	8-Oct-21	Kimball James	Loeb Maxwell	kim.loeb@ventura.org james.maxwell@ventura.org	(805) 650-4083 (805) 654-5164	Ventura County 800 S. Victoria Avenue, Ventura, CA 93009	Page 115, second Paragraph,	"...and UVRGA determines that exceedances are caused by groundwater pumping." The criteria for making this determination should be identified.	The criteria will be developed as part of the annual reporting and/or 5-yr GSP assessment process.
73	8-Oct-21	Kimball James	Loeb Maxwell	kim.loeb@ventura.org james.maxwell@ventura.org	(805) 650-4083 (805) 654-5164	Ventura County 800 S. Victoria Avenue, Ventura, CA 93009	Section 4.7.2.4	Section 4.7.2.4 discusses the increased costs for treatment of groundwater to meet water quality objectives for municipal beneficial users. This is an important issue, especially within the Meiners Oaks Water District's pumping areas.	Comment noted.
74	8-Oct-21	Kimball James	Loeb Maxwell	kim.loeb@ventura.org james.maxwell@ventura.org	(805) 650-4083 (805) 654-5164	Ventura County 800 S. Victoria Avenue, Ventura, CA 93009	Page 132, top paragraph	Consider using groundwater levels for measuring this SMC (in addition to flows). Measurement may be implied with the addition of new wells, but it is not sufficiently described in this section.	The SMC are consistent with GSP Emergency Regulations §354.28(c)(6), which states "The minimum threshold for depletions of interconnected surface water shall be the rate or volume of surface water depletions caused by groundwater use that has adverse impacts on beneficial uses of the surface water and may lead to undesirable results."
75	8-Oct-21	Kimball James	Loeb Maxwell	kim.loeb@ventura.org james.maxwell@ventura.org	(805) 650-4083 (805) 654-5164	Ventura County 800 S. Victoria Avenue, Ventura, CA 93009	Page 142, Section 5.3	Additional detail would be helpful regarding the spatial and temporal extent of the monitoring network. Although the GSP network may meet the DWR BMP guidance for well density, the Miramonte/Meiners Oaks area is lacking in monitoring locations. This could be a data gap with an additional well being needed to be identified in this area.	The spatial and temporal aspects of the groundwater levels monitoring network are presented on Figure 5.3-01 and in Table 5.3-01.
76	8-Oct-21	Kimball James	Loeb Maxwell	kim.loeb@ventura.org james.maxwell@ventura.org	(805) 650-4083 (805) 654-5164	Ventura County 800 S. Victoria Avenue, Ventura, CA 93009	Section 5.2	Does the Draft address amending the Plan at the five-year assessment to reflect any revisions or modifications made to the RWQCB Water Quality Objectives (Section 5.2)? The Draft discusses potential modification to monitoring networks if there are significant changes in pumping patterns or groundwater quality.	Potential changes to RWQCB WQOs is one of many factors that will be reviewed during GSP assessments. UVRGA believes this is implied in the assessment requirements.
77	8-Oct-21	Kimball James	Loeb Maxwell	kim.loeb@ventura.org james.maxwell@ventura.org	(805) 650-4083 (805) 654-5164	Ventura County 800 S. Victoria Avenue, Ventura, CA 93009	Section 6.2	Section 6.2 states the UVRGA will attempt to survey domestic well owners in the Basin. The survey will be designed to collect information from the well owners about well status, construction, usage, etc. VCPWA-WP oversees compliance with the County Well Ordinance (No. 4468). UVRGA should notify VCPWA-WP if a well is surveyed and does not comply with the County Well Ordinance.	Comment noted.
78	8-Oct-21	Kimball James	Loeb Maxwell	kim.loeb@ventura.org james.maxwell@ventura.org	(805) 650-4083 (805) 654-5164	Ventura County 800 S. Victoria Avenue, Ventura, CA 93009	Section 6.2	No mention is made of the CMWD proposed projects to increase water conservation and new water supply to bridge the 5,160 AFY gap in the loss of yield from Lake Casitas. The magnitude of impact of the 5,160-AFY to the UVR should also be documented.	This subject content was revised by Casitas MWD. UVRGA defers to Casitas MWD's edits.
79	8-Oct-21	Kimball James	Loeb Maxwell	kim.loeb@ventura.org james.maxwell@ventura.org	(805) 650-4083 (805) 654-5164	Ventura County 800 S. Victoria Avenue, Ventura, CA 93009	Section 7.1.6	The Draft does not discuss any anticipated effects on the Basin from the future removal of the Matilija Dam. It might be beneficial to discuss the impacts to the Basin after execution and completion of the project, likely to occur during the 20-year measurable objectives achievement period (Section 7.1.6).	The potential removal of Matilija Dam will be addressed in future GSP updates, as appropriate, based on actual progress toward project execution.
80	8-Oct-21	Benjamin	Pitterle	ben@sbck.org	805-636-6189	Santa Barbara Channelkeeper 714 Bond Avenue Santa Barbara, CA 93103	4.4 Chronic Lowering of Groundwater Levels	Chronic Lowering of Groundwater Levels The GSP used the lowest recorded historical groundwater level outlier as the groundwater level and storage minimum threshold. The stated purpose of establishing this threshold is to prevent significant and unreasonable effects that include causing municipal, domestic, or agricultural beneficial users to be unable to meet basic water supply needs with groundwater or alternative supplies, or permanent or prolonged impacts to riparian GDEs. We note that the ability to pump groundwater from the Robles reach is routinely disrupted during drought for many water rights holders in the basin including the existing municipal water districts. These purveyors rely significantly if not entirely during drought years on alternative supply from Lake Casitas. Lake Casitas is currently critically reduced in capacity. In light of these circumstances and the risk of increased frequency of drought due to climate change, we find the selection of the lowest recorded historical groundwater level in appropriate as a minimum threshold to prevent undesirable effects to water supplies related to chronic lowering of groundwater levels.	UVRGA does not agree with the conclusion that the minimum thresholds for chronic lowering of groundwater levels are inappropriate. As discussed in Section 4.4.1, the availability of surface water supplies from Lake Casitas is a key factor in UVRGA concluding that there have not been significant and unreasonable effects even during periods of low groundwater levels. UVRGA considers increased use of surface water supplies from Lake Casitas during dry periods a form of conjunctive use (see Section 2.2.2.3) as opposed to a significant and unreasonable effect. UVRGA will consider the availability of Lake Casitas surface water during each 5-year GSP assessment.

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81	8-Oct-21	Benjamin	Pitterle	ben@sbck.org	805-636-6189	Santa Barbara Channelkeeper 714 Bond Avenue Santa Barbara, CA 93103	4.9 Depletions of Interconnected Surface Water	Foster Park Flow Protocols The “Foster Park Flow Protocols” are not based on the best available science. Santa Barbara Channelkeeper negotiated the protocols with the City of Ventura as a means to provide “life support” for the lower reaches until a final outcome is reached with the Ventura River Watershed Adjudication. The State Water Board’s groundwater and surface water model was not available when the protocols were developed. The California Department of Fish and Wildlife’s instream flow recommendations for the Ventura River were not available when the protocols were developed. Based on current implementation of the protocols in 2021, extractions at Foster Park continued to take place even though river flows in the reach dropped below 2 CFS for prolonged periods of time. 2 CFS was identified by the City of Ventura’s own 2013 Hydrology Study as a critical threshold below which is detrimental to critical habitat conditions. The “Foster Park Flow Protocols” do not have the endorsement of State and Federal resource agencies. For these reasons, the GSP should not rely on long-term implementation of the “Foster Park Flow Protocols” to ensure that undesirable results do not occur.	SGMA requires UVRGA to establish minimum thresholds for depletion of surface water flow. Minimum thresholds for Foster Park are based on the current best available science, which UVRGA believes is the site-specific study by Hopkins (2013). The CDFW flow recommendations do not identify a threshold for significant and unreasonable effects based on groundwater pumping as the Padre study included in Hopkins (2013) does. The CDFW study includes surface flow recommendations to maintain beneficial habitat conditions for steelhead. Although the UVRGA agrees that maintaining surface water conditions is important to the health of aquatic species and their habitats, including steelhead, SGMA does not require GSA to maintain optimal surface water conditions for riverine species, but rather to manage significant and unreasonable effects related to groundwater pumping. Additionally, UVRGA recommends a monitoring program to address uncertainties of impacts to the Foster Park Aquatic GDE that could be related to depletions of interconnected surface water. UVRGA proposes a study comprised of continuous water quality monitoring, field observations of instream habitat and aquatic species, and in-situ water quality and flow measurements. Data collected through these monitoring efforts will inform future minimum threshold determinations.
82	8-Oct-21	Benjamin	Pitterle	ben@sbck.org	805-636-6189	Santa Barbara Channelkeeper 714 Bond Avenue Santa Barbara, CA 93103	4.9 Depletions of Interconnected Surface Water	GDE Analysis The GSP has not adequately demonstrated that permanent and prolonged impacts to GDEs have not already occurred in the Robles reach due to historic groundwater extractions. Rather, the GSP essentially asserts that the Robles reach is not a GDE because certain riparian vegetation communities were not identified in the GSA’s recent analysis. Significant groundwater extractions, however, have been occurring for many decades. Such extractions and any related depletions of surface water would likely have significant impact on any riparian vegetation that may have been present during the period analyzed during GSP development.	Modeling results indicate that groundwater levels in the Robles and Santa Ana area naturally fluctuate significantly below the rooting depth of the dominant species classified in those areas (i.e., scalebroom and alluvial scrub). UVRGA has modeled the water table elevations (Appendix L) and streamflow absent groundwater pumping and determined that the incremental increase in groundwater levels and streamflow that would occur absent pumping (Appendix N and GSP text Sections 3.2.6 and 4.9) is small. Even absent all pumping in the Basin, UVRGA’s biologists do not anticipate widespread recruitment of riparian vegetation in the Robles and Santa Ana Areas, as the difference in groundwater levels does not appear to be particularly meaningful in terms of the water requirements of riparian species, given the seasonal fluctuation of water availability.
83	8-Oct-21	Benjamin	Pitterle	ben@sbck.org	805-636-6189	Santa Barbara Channelkeeper 714 Bond Avenue Santa Barbara, CA 93103	4.9 Depletions of Interconnected Surface Water	Channelkeeper echoes comments submitted by the Surfrider Foundation, Ventura Chapter as they related to the GDE analysis included in the draft GSP. These comments are reiterated below: “The Riparian Groundwater Dependent Ecosystems Assessment Report characterizes the Robles reach as a “Losing reach with generally disconnected groundwater- surface water.” This categorization eliminates the majority of this Groundwater Dependent Ecosystem from consideration under SGMA by assuming that it is “disconnected” and thus has too great a depth to groundwater to support riparian habitat. Other reaches are similarly dismissed.	Please see response to comment 5 above.
84	8-Oct-21	Benjamin	Pitterle	ben@sbck.org	805-636-6189	Santa Barbara Channelkeeper 714 Bond Avenue Santa Barbara, CA 93103	4.9 Depletions of Interconnected Surface Water	The analysis presented relies heavily on the Nature Conservancy “Natural Communities (NC) Dataset,” using vegetation communities to eliminate GDE polygons from the Upper Ventura River Groundwater Basin. The NC dataset is a statewide geographic computer database that maps vegetation types in all potential GDEs throughout the State of California. The large geographic scope of this map does not accurately represent current on-the-ground conditions, and more robust ground truthing should be undertaken. Even the aerial photos presented tell a different story than is acknowledged in the narrative.	Please see response to comment 6 above.

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85	8-Oct-21	Benjamin	Pitterle	ben@sbck.org	805-636-6189	Santa Barbara Channelkeeper 714 Bond Avenue Santa Barbara, CA 93103	4.9 Depletions of Interconnected Surface Water	Unfortunately, the UVRGSA analysis does not fully implement the Best Practices for using the NC Dataset guidance provided by the Nature Conservancy, which presents six best practices for using local groundwater data to confirm whether mapped features in the NC dataset are supported by groundwater. (Best Practices for using the NC Dataset, TNC July 2019). According to this guidance: -While depth-to-groundwater levels within 30 feet of the land surface are generally accepted as being a proxy for confirming that polygons in the NC dataset are supported by groundwater, it is highly advised that fluctuations in the groundwater regime be characterized to understand the seasonal and interannual groundwater variability in GDEs. (see Best Practice #2.) -One of the key factors to consider when mapping GDEs is to contour depth-to groundwater in the aquifer that is supporting the ecosystem (see Best Practice #5). The GIS Spatial Analysis of Maximum Rooting Depth and Groundwater Level presented in the Riparian GDE document does not present such contour depth-to-groundwater mapping or account for temporal variability	Please see response to comment 7 above.
86	8-Oct-21	Benjamin	Pitterle	ben@sbck.org	805-636-6189	Santa Barbara Channelkeeper 714 Bond Avenue Santa Barbara, CA 93103	4.9 Depletions of Interconnected Surface Water	Furthermore, TNC guidance acknowledges that; In many situations, the hydrologic connection of NC dataset polygons will not initially be clearly understood if site-specific groundwater monitoring data are not available. If sufficient data are not available in time for the 2020/2022 plan, The Nature Conservancy strongly advises that questionable polygons from the NC dataset be included in the GSP until data gaps are reconciled in the monitoring network. Erring on the side of caution will help minimize inadvertent impacts to GDEs as a result of groundwater use and management actions during SGMA implementation. Many of California's GDEs have adapted to dealing with intermittent periods of water stress, however if these groundwater conditions are prolonged, adverse impacts to GDEs can result. Therefore, it is likely that the NC vegetation mapping is representative of conditions in which groundwater levels have been frequently and repeatedly pumped beyond the reach of riparian tree roots. Meanwhile, field observations over the past few wetter years show that the riparian vegetation has rebounded, illustrating how the ecosystem responds with the variation in water years. Receding groundwater levels and corresponding loss of surface flows in the current drought will likely reverse this recent trend, with the potential loss of the many young sycamores and other riparian vegetation.	Please see response to comment 9 above.
87	8-Oct-21	Benjamin	Pitterle	ben@sbck.org	805-636-6189	Santa Barbara Channelkeeper 714 Bond Avenue Santa Barbara, CA 93103	4.9 Depletions of Interconnected Surface Water	Determining Groundwater/Surface water interactions TNC guidance for determining GDEs recognizes the importance of surface flows; In addition, SGMA requires that significant and undesirable adverse impacts to beneficial users of surface water be avoided. Beneficial users of surface water include environmental users such as plants or animals, which therefore must be considered when developing minimum thresholds for depletions of interconnected surface water. The Model Results and SMC Implications Presentation (March 25, 2021) reaches the conclusion that: • Basin water budget is dominated by streamflow percolation into the Basin and groundwater discharge to Ventura River • GW pumping averages only ~10% of the GW Budget As low as 4% in wet years Up to 31% in dry years • Basin GW levels will be lower in dry seasons, but Basin will still re-fill in normal to wet years The conclusion that there is no impact from pumping based on the fact that the basin rapidly refills in the wet season points to the likelihood that the surface water is in fact "connected" to groundwater during these periods. Moreover, the fact that pumping represents up to 31% of the budget in critical dry years raises the question of how groundwater extractions impact surface flows and groundwater levels.	Please see response to comments 10 and 11 above.
88	8-Oct-21	Benjamin	Pitterle	ben@sbck.org	805-636-6189	Santa Barbara Channelkeeper 714 Bond Avenue Santa Barbara, CA 93103	4.9 Depletions of Interconnected Surface Water	The Model Results identify four areas of concentrated pumping, three of which directly impact groundwater levels in the "Robles Reach." This reach is the area with the most storage in the Basin, and should be considered as the "primary sub-Basin" for water supply. The three areas of concentrated pumping in this reach are likely to affect conditions throughout the Basin.	See response to comment 12 above.

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89	8-Oct-21	Benjamin	Pitterle	ben@sbck.org	805-636-6189	Santa Barbara Channelkeeper 714 Bond Avenue Santa Barbara, CA 93103	4.9 Depletions of Interconnected Surface Water	The analyses and graphs presented in the Model Results do not provide information on the spacial and temporal surface flow conditions as they relate to groundwater levels. Because the downstream reaches are largely dependent on surface and groundwater flows out of this sub-Basin, further analysis is needed to more clearly define the relationship between groundwater levels and surface flows. The analyses should, at a minimum, determine threshold groundwater levels at which surface flows are diminished or eliminated, both in the reach being monitored and downstream. This relationship was established decades ago in the Ventura River Conjunctive Use Report (1978) which states that; Flows in the live stretch are affected by both the rate of recharge of the upper part of the Ventura River groundwater Basin and by the rate of groundwater extraction from wells in the river. Investigations published in the Conjunctive Use Report identified groundwater elevation thresholds in the upper Basin at which flows in the live reach will cease; when the water level in well 4N23W16C4 falls below Elevation 495, surface flow in much of the live stretch stops although some pools remain. A flow of 1 cfs or more in the live stretch corresponds with a water level in this well of greater than about Elevation 507.	See response to comment 13 above.
90	8-Oct-21	Benjamin	Pitterle	ben@sbck.org	805-636-6189	Santa Barbara Channelkeeper 714 Bond Avenue Santa Barbara, CA 93103	4.9 Depletions of Interconnected Surface Water	Groundwater levels also affect surface flows in the Robles Reach, which frequently dries up despite constant inflows. Unfortunately, the Aquatic GDE Impact Analysis is quick to dismiss the effect of groundwater elevation on surface flows; No monitoring is recommended at either of the critical riffle aquatic GDEs or the Robles Habitat Area, as impacts from pumping in these areas were determined to be minimal or non-existent. This conclusion is inconsistent with the guidance provided in Monitoring Networks and Identification of Data Gaps BMP (DWR 2016) which states: 23 CCR §354.34(c)(6).	See response to comment 14 above.
91	8-Oct-21	Benjamin	Pitterle	ben@sbck.org	805-636-6189	Santa Barbara Channelkeeper 714 Bond Avenue Santa Barbara, CA 93103	4.9 Depletions of Interconnected Surface Water	The Draft GSP accurately identifies the Confluence Area as a GDE. The GSP, however, falls short in its determination that more years of study are necessary to determine if surface flow depletions caused by upstream pumping are significant and unreasonable. The confluence area is critical habitat for federally endangered Southern California steelhead trout. Steelhead have been observed over-summering in pools within this reach by state and local resource agencies. Surface water habitat and water quality conditions degrade significantly (to the point of complete dewatering) in this reach due to depletions of interconnected groundwater in the Robles reaches. The numeric model utilized to determine the effect of pumping on surface flows in the Confluence Area is not based on the best available science, which includes the State Water Resource Control Board's Groundwater and Surface Water model, currently well under development.	UVRGA recognizes that the Confluence Area provides important habitat for steelhead and other aquatic species, as outlined in the Aquatic GDE Memo. For the Confluence Area, it is unclear if depletions cause significant and unreasonable effects and monitoring is proposed to answer that question. The GSP recommends a monitoring program for the Confluence Habitat Area Aquatic GDE that may include water quality monitoring, field observations of instream habitat and aquatic species, and in-situ water quality and flow measurements. The details of the monitoring programs will be decided when the monitoring workplans are developed and approved by the UVRGA Board. The SWRCB model was not available for consideration during GSP development. However, based on review of the SWRCB model, UVRGA's numerical model provides a higher resolution of the Basin. UVRGA considers its model the best available science for GSP development. Having said that, UVRGA intends to evaluate the utility of using both models together for future GSP assessments and updates (the SWRCB Board model for regional inputs and the UVRGA model for improved resolution along the Ventura River). This approach will take advantage of the strengths of each model.

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92	8-Oct-21	Benjamin	Pitterle	ben@sbck.org	805-636-6189	Santa Barbara Channelkeeper 714 Bond Avenue Santa Barbara, CA 93103	4.9 Depletions of Interconnected Surface Water	<p>“Direct” Depletions of Surface Water The GSP defines the terms “direct” and “indirect” depletion with regard to depletion of interconnected surface waters. Direct depletion is defined as surface water depletion caused by a cone of depression from pumping wells near the Ventura River. The GSP, however, then continues to identify only the Foster Park Well field as a facility causing direct depletion. Multiple, major water extraction facilities are located in the Robles reach of the Upper Ventura River Basin. These facilities utilize wells located in direct proximity of the Ventura River. Pumping from these wells has the potential to create a cone of depression that could deplete surface flows. The Robles Reach historically receives perennial inflows from the upper Ventura River and its Matilija Creek and North Fork Matilija Creek tributaries. These inflows persist even during prolonged periods of drought. The GSP has not provided adequate evidence to support its assertion that most groundwater in the Basin “naturally” drains out of the Basin at a rate greater than inflows. In any case, pumping from wells located within the Basin and within immediate proximity of the Ventura River clearly have the capacity to produce cone of depression effects that can reduce and eliminate surface flows earlier than may naturally occur absent pumping. Such reduction in flows could have significant effects on riparian habitat and aquatic communities within the Robles Reach and downstream.</p>	Depletion of surface water in the Robles Reach was estimated using the numerical model. The model was run with and without pumping to determine streamflow depletions. The results indicated that depletion in the Robles Reach was very small compared to surface water flows during the steelhead migration season. Therefore, it was concluded that there are no significant and unreasonable depletions of surface water in the critical riffle areas caused by pumping. UVRGA concludes that detailed monitoring is not necessary in these areas due to the very small and insignificant modeled depletions and that the limited funding available for monitoring should be prioritized in the Confluence and Foster Park Areas, where UVRGA has concluded that significant and unreasonable effects could potentially occur.
93	13-Oct-21	Michael	Flood	mflood@casitaswater.com	805-649-2251	Casitas MWD 1055 N. Ventura Ave. Oak View, CA 93022		Various edits	All requested edits were made.
94	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802		As explained more fully in the enclosure, the Draft GSP does not, but should, adequately address the recognized instream beneficial uses of the Upper Ventura River Groundwater Basin, as well as other GDE, potentially affected by the management of groundwater within the subject basin. Additionally, the Draft GSP should also recognize the important relationship between the extensive groundwater extractions and water diversion and storage within the basin (including the Robles and Foster Park diversion facilities) and its potential adverse effects on the amount and extent of surface flows and other water dependent habitat features utilized by the federally listed endangered southern California steelhead (<i>Oncorhynchus mykiss</i>).	<p>Please see the “Environmental users of groundwater” bullet in section 2.3.1 where GDEs and instream beneficial uses are listed. Surface water beneficial uses are further detailed in Section 4.9.1. Appendix O and P provide the background on all potential GDEs (both riparian and aquatic) considered in the GSP.</p> <p>Specifically, aquatic GDEs (instream beneficial uses) were identified and considered in the GSP, as required by SGMA. Appendix P details the identification and assessment of aquatic GDEs, which are addressed in the sustainable management criteria for the depletions of interconnected surface water sustainability indicator (GSP Section 4.9).</p> <p>The numerical modeling analysis performed for the GSP accounts for Robles Diversion operations, Foster Park operations, and other groundwater extractions from the Basin, as described in Appendix H and Sections 3.3 and 4.9.</p>
95	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802		The development and operation of groundwater supply facilities throughout the Basin are integral in the management of the water resources of the Ventura River. Facilities such as Robles Diversion and Foster Park Diversion (along with Matilija and Casitas dams) have profoundly altered the natural surface flow and groundwater recharge patterns in the Ventura River watershed, from the headwaters to the Pacific Ocean (e.g., NMFS 2003, 2007). Unless the Draft GSP is revised to reflect the operation of these integral components of the groundwater management program for the Ventura River, the future adopted GSP is unlikely to meet the requirement of SGMA to effectively provide for the protection of habitats, including those recognized instream beneficial uses that are dependent on groundwater such as fish migration, spawning and rearing, as well as other GDE within the Basin.	<p>The numerical modeling analysis performed for the GSP accounts for Robles Diversion operations, Foster Park operations, and other groundwater extractions from the Basin, as described in Appendix H and Sections 3.3 and 4.9.</p> <p>UVRGA is unaware of any requirements under SGMA for the GSP “to provide for the protection of habitats, including those recognized instream beneficial uses that are dependent on groundwater such as fish migration, spawning and rearing, as well as other GDE within the Basin.” Rather, SGMA requires the GSA to avoid significant and unreasonable effects as determined by the GSA with stakeholder input. Although UVRGA agrees that protecting habitats is important to the health of aquatic species, including steelhead, SGMA does not require GSA to maintain optimal conditions for riverine species, but rather to manage the prevention of significant and unreasonable effects related to groundwater extractions within 20 years. The GSP seeks to avoid significant and unreasonable effects by implementing minimum thresholds for the depletion of interconnected surface water that are meant to prevent substantial stress and/or potential mortality of steelhead related to groundwater extractions and are based on the best available science. The minimum thresholds do not preclude other actions that may be taken by other entities to enhance conditions for steelhead, which could optionally be incorporated into a future GSP update.</p>

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96	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802		When analyzing impacts on steelhead or other aquatic organisms resulting from groundwater and related streamflow diversions, identifying flow levels that effectively support essential life functions of this organism is critical (Barlow and Leake 2012). Specifically, it is essential to determine what flows adequately supports steelhead migration during the winter and spring, and juvenile rearing year round. Without an understanding of these hydrologic/biotic relationships, a GSP cannot ensure that significant and unreasonable adverse impacts from groundwater depletion (and in the case of the Ventura River, the integrally related surface water diversion/groundwater extraction program) are avoided (Heath 1983, California Department of Water Resources 2016, Belin 2018, CDFW 2019).	The GSP includes minimum thresholds for depletion of interconnected surface that are based on the best available science for hydrologic/biotic relationships. The GSP includes biological monitoring activities that will expand the understanding of site-specific hydrologic/biotic relationships (see GSP Section 5.8). UVRGA will review and consider new data and information concerning hydrologic/biotic relationships during each GSP review/update.
97	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	Pages ES-iii-iv	The Draft Plan states: "The beneficial uses of groundwater extracted from the Basin include municipal, industrial, and agricultural water supply." p. ES-iii The listed beneficial uses extracted from the boundaries of the Basin include only out-of-stream beneficial uses, and largely ignores the instream beneficial uses, including those linked to GDE. The Draft GSP should be revised to explicitly acknowledge the instream beneficial uses supported by the Basin, including the GDE associated with the upper Ventura River, as well as those affected by groundwater extraction from the Basin, including the lower Ventura River and the Ventura River Estuary. The recognized instream beneficial uses for the portion of the upper Ventura River within the Basin include: warm freshwater habitat, cold freshwater habitat, wildlife habitat, habitat for rare, threatened and endangered species, fish migration, and wetland habitat. Ventura River Estuary instream beneficial uses include: estuarine habitat, marine habitat, wildlife habitat, habitat for rare, threatened and endangered species, fish migration, spawning habitat, and wetland habitat.	Please see the "Environmental users of groundwater" bullet in section 2.3.1 where GDEs and instream beneficial uses are listed. Surface water beneficial uses are further detailed in Section 4.9.1. Appendix O and P provide further background on all potential GDEs considered in the GSP (both riparian and aquatic). Specifically, aquatic GDEs (instream beneficial uses) were identified and considered in the GSP, as required by SGMA. Appendix P details the identification and assessment of aquatic GDEs, which are addressed in the sustainable management criteria (SMC) for the depletion of interconnected surface water sustainability indicator (GSP Section 4.9). The lower Ventura River and Ventura River Estuary are located in the Lower Ventura River Basin, which is not subject to SGMA due to its low priority status. UVRGA is unaware of any specific concerns downstream of the Upper Ventura River Basin that would be related to groundwater management of the Upper Ventura River Basin and no specific concerns were raised by stakeholders during the GSP development process for consideration.
98	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	Pages ES-iii-iv	The Draft GSP recognized only two GDE areas within the Basin: 1) Confluence Aquatic Habitat Area, and 2) Foster Park Aquatic Habitat Area. This recognition of GDE underrepresents the known function and value of the river reach within the Basin for adult and juvenile endangered southern California steelhead. Steelhead use the entire reach of the Ventura River within the Basin for completing their life-cycle. See Figures 1 and 2 for a depiction of the designated steelhead critical habitat and intrinsic potential habitat within the Ventura River watershed, including the Basin B. See additional comments below regarding the GDE areas identified in the Basin.	UVRGA has quantified depletion of surface water throughout the Basin (Appendix N; GSP Section 3.2.6 and 4.9, Table 3.2-01, Figures 4.9-01 and 4.9-03) and has concluded that depletions are small relative to typical surface flows upstream of the Confluence Aquatic Habitat Area. SMC are not required for those areas because UVRGA has concluded that the small depletions do not cause significant and unreasonable effects.
99	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	ES-3 Regional Water Management Framework Page ES-iv	<i>Casitas Municipal Water District Water Supply Management:</i> It should also be recognized that the Casitas Municipal Water District (CMWS) manages the Matilija Dam conjunctively with the Robles Diversion and Casitas Dam.	Comment noted.

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100	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	ES-4 Basin Setting and Groundwater Conditions Page ES-vii	<p>The Draft GSP notes that: "Groundwater extractions are secondary to spring discharge to the Ventura River except during dry periods when spring flows decrease substantially due to low Ventura River stream flow entering the northern end of the Basin" p. ES-vii</p> <p>The Ventura River watershed encompasses a system of connected groundwater and surface water that may become disconnected when groundwater levels are very low during drought and heavy groundwater extractions (or surface diversions), but this condition is anomalous, and does not represent the natural functioning of the system under unimpaired conditions. The SWRCB groundwater-surface flow study of the Ventura River (which includes the tributary groundwater basins) clearly demonstrates the connections between groundwater levels and surface flow (SWRCB 2021). The regulations governing SGMA do not stipulate that the provisions of SGMA cover only "principal aquifers" as the Draft GSP appears to presume. The regulations define interconnected surface water as "surface water that is hydraulically connected at any point by a continuous saturated zone to the underlying aquifer and the overlying surface water . . ." (23 CCR Section 351(0)). Significantly, "continuous" refers specifically to hydrologic connection, not a continuous temporal connection.</p> <p>The Draft GSP does not adequately recognize the potential role of groundwater in the Basin, including the lower Ventura River and Ventura River Estuary, for ensuring suitable surface water in habitat for supporting different life-history phases of steelhead. Further, because groundwater-management activities within the Ventura River watershed involve the CMCD diversion operations at the Robles Diversion, the relationship between these diversion activities and groundwater elevations along the affected portion of the Ventura River (and estuary) should be addressed in the revised Draft GSP.</p> <p>See additional comments below on interconnected groundwater and surface flows water surface elevations in Confluence Aquatic Habitat Area GDE and Foster Park Aquatic Habitat Area GDE within the Basin.</p>	<p>The GSP more than adequately characterizes the role of groundwater in the Basin. The numerical modeling performed for the GSP provides a comprehensive quantitative assessment and accounting of the relationship between groundwater and the Ventura River.</p> <p>The numerical modeling analysis performed for the GSP accounts for Robles Diversion operations, as described in Appendix H.</p> <p>SGMA does not require GSAs to manage basins to achieve unimpaired conditions.</p> <p>The lower Ventura River and Ventura River Estuary are located in the Lower Ventura River Basin, which is not subject to SGMA due to its low priority status. UVRGA is unaware of any specific concerns downstream of the Upper Ventura River Basin that would be related to groundwater management of the Upper Ventura River Basin and no specific concerns were raised by stakeholders during the GSP development process for consideration.</p>
101	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	ES-4 Water Budget Pages ES-x-xiii	<p>The Draft GSP notes that: "It was concluded that these factors [i.e., land use changes and population growth] are not anticipated to have a material impact on future water demand and the water budgets for the Basin because of land use policies and ordinances that greatly limit the potential for material growth in the basin" p. ES-x</p> <p>This statement is misleading because it does not recognize that groundwater resources of the Basin are used outside the Basin; for example, a substantial amount of groundwater extracted from the City of Ventura's groundwater wells in the vicinity of the Foster Park Aquatic Habitat Area GDE are used outside of the Basin to support development in eastern of Ventura, the fastest growing portion of the City of Ventura. The revised Draft GSP should acknowledge that future land use development and population growth outside of the Basin has the potential to affect the groundwater budget within the Basin.</p>	<p>Based on the 2020 Urban Water Management Plan for the City of Ventura (Kennedy/Jenks, 2021), production from the Upper Ventura River Basin is limited by infrastructure, the settlement with Santa Barbara Channelkeeper, and low-flow hydrology (Also, see description of the "Foster Park Protocols" in GSP Sections ES-8, 2.2.2.2, and 4.9.1, and 6.3). In addition, the forecasted estimated supply from the Upper Ventura River Basin is not projected to increase in the City of Ventura UWMP (Kennedy/Jenks, 2021).</p>

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102	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	Overdraft Assessment Pages xi-xii	<p>The Draft GSP concludes that: "The water budget results do not indicate an overdraft condition in the Basin currently or in the future. Groundwater level have not been observed to decline over a period of years without fully recovering. Numerical model result for the project water budget indicate that groundwater levels will continue to fully recovery following droughts." p. xii</p> <p>Several aspects of this statement are problematic. First, the years of record used for this assement include extensive periods of drought, and represent a groundwater/surface water system substantially impacted by past and currently unregulated groundwater extractions. Therefore, it is not surprising that an overdraft condition was not indicated.</p> <p>Second, relying on an assessment that is influenced by an extensive drought period and unregulated groundwater pumping is not likely to inform a proper environmental baseline for determining the true effects of a proposed groundwater-withdrawal program on GDE, including those supporting endangered steelhead.</p> <p>Third, using a degraded environmental baseline as the comparative barometer has the potential to perpetuate a degraded environmental baseline into the future.</p> <p>Fourth, the assessment appears to relate primarily to providing groundwater for traditional out-of-stream beneficial uses such a municipal and industrial supply, not instream beneficial uses, including use of ground and related surface waters by the federally endangered southern California steelhead, as well as other GDE.</p> <p>We would also note while more frequent and prolonged depression groundwater levels can sometimes be offset with water storage systems, or temporary water conservation use, to ensure out-of-stream uses of water demands, GDEs do not function in the same way. Even though a groundwater basin may "fully recover" its groundwater levels, the species depending upon an adequate supply of water do not respond or recovery in the same way as the physical system can. The revised GSP should recommend this fundamental difference in the role of groundwater supplies in supporting out-of-stream and instream beneficial uses, and the related GDE.</p>	<p>This commenter incorrectly considers the water budgets presented in the GSP to constitute an environmental baseline. The water budgets are not intended to serve as an environmental baseline; rather, the water budgets are included to meet the GSP Emergency Regulations requirements for quantification of surface water and groundwater inflows and outflows to/from the Basin under historical, current, and projected future conditions.</p> <p>Please see the "Environmental users of groundwater" bullet in section 2.3.1 where GDEs and instream beneficial uses are listed. Surface water beneficial uses are further detailed in Section 4.9.1. Appendix O and P provide further background on all potential GDEs considered in the GSP (both riparian and aquatic).</p>
103	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	Sustainable Yield Pages xii-xiii	<p>The Draft GSP concludes: "In summary the concept of a sustainable yield over a long-term average period is not relevant to management of the UVRGB." P. xii</p> <p>While expression of groundwater conditions in term of long-term averages conditions may have limited utility (particularly with respect to GDE) in a highly variable rainfall and run-off pattern, a long-term water budget is relevant. See comments above regarding the overdraft assessment.</p>	Please see response to above comment.
104	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	ES-6 Sustainable Management Criteria Pages ES-xiii-x	<p>The sustainable criteria are expressed explicitly and in terms of groundwater levels, storage water quality and depletion of interconnected surface waters, and do not clearly relate to the habitat conditions necessary to support steelhead during incubation and rearing phases of their life-cycle.</p>	The SMC for the depletion of interconnected surface water considered the effects on aquatic GDEs, which include steelhead (See section 4.9.1).
105	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	Chronic Lowering of Groundwater Levels and Reduction of Groundwater Storage Page xiv-xv	<p>While the Draft GSP recognizes potential significant and unreasonable effects from groundwater extractions, the minimum thresholds identified to address this is are based on historical low groundwater levels in the representative groundwater level monitoring wells. Using this standard, which includes significant periods of drought and unregulated groundwater extraction, is not likely to provide long-term protection for all the recognized beneficial uses of the Basin. Specifically, the exceedances caused by groundwater extraction and the related measurable objectives for groundwater storage do not adequately recognize the needs of the federally endangered southern California steelhead, or other GDE. The proposed standards appear aimed at seasonally refilling the Basin for the purposes of protecting existing groundwater extractions for traditional out-of-stream beneficial uses, and not for the protection of GDE. See additional comments below.</p>	The SMC for the chronic lowering of groundwater levels considered the effects on riparian GDEs (See section 4.4.1). The SMC for the depletion of interconnected surface water considered the effects on aquatic GDEs, which include the habitat for steelhead (See section 4.9.1).

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106	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	Degraded Water Quality Page xvi-xvii	The Draft GSP does adequately recognize the important relationship between groundwater levels and the surface flows (particularly base flows) or water quality parameters (such as temperature, dissolved oxygen, etc.) that contribute to the maintenance of GDE within the Basin (including the lower Ventura River and the Ventura River Estuary).	<p>The numerical modeling performed for the GSP provides a comprehensive quantitative assessment and accounting of the relationship between groundwater and the Ventura River.</p> <p>The depletion of interconnected surface water SMC are based on a site-specific study (Hopkins 2013) that established a relationship between flow and potential significant and unreasonable effects on steelhead.</p> <p>The lower Ventura River and Ventura River Estuary are located in the Lower Ventura River Basin, which is not subject to SGMA due to its low priority status. UVRGA is unaware of any specific concerns downstream of the Upper Ventura River Basin that would be related to groundwater management of the Upper Ventura River Basin and no specific concerns were raised by stakeholders during the GSP development process for consideration.</p>
107	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	Depletions of Interconnected Surface Water Page xvii-xix	As noted above, the Draft GSP recognized only two GDE areas within the Basin: 1) Confluence Aquatic Habitat Area and 2) Foster Park Aquatic Habitat Area. This limited recognition of the actual extent of GDE within the Basin does not accurately reflect the use of the river reach within the Basin by endangered southern California steelhead. Steelhead use the entire reach of the Ventura River within the Basin in completing their life-cycle. See Figures 1 and 2 for a depiction of the designated critical habitat and intrinsic potential habitat within the Ventura River watershed, including the Basin.	UVRGA has quantified depletion of surface water throughout the Basin (Appendix N; GSP Section 3.2.6 and 4.9, Table 3.2-01, Figures 4.9-01 and 4.9-03) and has concluded that depletions are small relative to typical surface flows upstream of the Confluence Aquatic Habitat Area. SMC are not required for those areas because UVRGA has concluded that the small depletions do not cause significant and unreasonable effects.

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108	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	Depletions of Interconnected Surface Water Page xvii-xix	<p>The Draft GSP indicates that the sustainable management criteria for interconnected surface waters in the Foster Park Aquatic Habitat Area GDE relied on a field study performed by Hopkins (2013). This study, which the Draft GSP characterized as “the best available science for the Foster Park Aquatic Habitat Area”, identified a flow of 2 cfs measured at the USGS Foster Park gauge (1118500) as adequate to prevent significant and unreasonable effects on steelhead. This claim warrants a couple of comments:</p> <p>First, the base flows are difficult to accurately measure in alluvial river settings that are characterized by shifting channel, and where and groundwater and hyporheic flows constitute an important component of the surface flow conditions. We would note in this regard that there are reported discrepancies between the Hopkins and USGS gauge measurements, as well the City of Ventura’s gauge measurements, and those done by other groups such as Santa Barbara Channel Keeper as part of their water quality monitoring pursuant to the State Water Board’s Quality Assurance Plan (USGS Station 11118500 Ventura R NR Ventura nwis.waterdata.usgs.gov/nwis, Foster Park gauge reporting website https://www.picovale.com).</p> <p>Second, NMFS has conducted an analysis of the effects of the groundwater extractions of the City of Ventura’s well field in the Foster Park area and concluded that the groundwater extractions would have significant effects of rearing steelhead in wet, average and dry hydrologic conditions, and has identified a minimum flow (11-12 cfs) that is considerably larger than that proposed in the Hopkins study (NMFS 2007). In its analysis, NMFS noted that the rate of pumping during wet years analyzed groundwater extractions from the Foster Park well field varied between 1 cfs and 20 cfs, and most commonly ranged between 9 to 12 cfs. These well pumping rates reduced surface flow in the Foster Park area by more than 50%, from about 15 cfs to less than 5 cfs in during the summer or fall in 1992, 1993, and 2001 when juvenile rearing would be expected to utilize the habitat. During average hydrologic conditions, the maximum and minimum flows in the lower Ventura River were reduced by well field withdrawals. The range of well field withdrawals during average rainfall years was also from about 2 cfs to 20 cfs, and ranged between 8 and 10 cfs. The reduction of surface flows from the Foster Park well field operations would result in extremely low surface flow levels (< 2 cfs), and would occur earlier in the year, compared to wet hydrologic conditions. Flow records during average rainfall years show that flows dropped to levels at or near zero due to the Foster Park well field extractions during the summer and fall rearing period in almost all average rainfall year (NMFS 2007, pp. 24-25).</p> <p>Based on this analysis, and an assessment of the effects of groundwater extractions in the Foster Park area, NMFS identified a limit on groundwater extractions that would prevent a reduction of surface flow in the Foster Park area below 11 to 12 cfs (measured at the USGS Foster Park gauge 11118500), a level significantly higher than that identified by Hopkins, and adopted by the Draft GSP.</p>	<p>For the Foster Park Area, the minimum thresholds are based on the current best available science, which is the site-specific study by Padre (Hopkins 2013). Neither the CDFW flow recommendations nor the NMFS draft BO identify a threshold for significant and unreasonable effects based on groundwater pumping, while such a threshold is established in the Padre study. The CDFW study and BO include surface flow recommendations or requirements, respectively, to maintain beneficial habitat conditions for steelhead, which are not indicative of significant and unreasonable effects. Although the UVRGA agrees that maintaining beneficial surface water habitat conditions is important to the health of aquatic species and their habitats including steelhead, SGMA does not require GSAs to maintain surface water conditions for riverine species, but rather to manage significant and unreasonable effects related to groundwater pumping. The minimum thresholds do not preclude other actions that may be taken by other entities to enhance conditions for steelhead, which could optionally be incorporated into a future GSP update.</p>
109	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	ES-7 Monitoring Networks Pages x-xii	<p>The proposed monitoring is aimed primarily at addressing the limited Sustainable Management Criteria for only two GDE. There is little in the monitoring program that specifically addresses the potential effects of groundwater extractions on other GDE, including, but not limited to, the upper reaches of Basin, as well as the lower Ventura River and the Ventura River Estuary. As noted above, the Draft GSP recognized only two GDE areas within the Basin: 1) Confluence Aquatic Habitat Area and 2) Foster Park Aquatic Habitat Area. This limited recognition of GDE does not accurately affect the use of the reaches of the Ventura River within the Basin made by the endangered southern California steelhead, as well as other reaches and which may be affected by groundwater extractions from the Basin.</p>	<p>UVRGA has quantified depletion of surface water throughout the Basin (Appendix N; GSP Section 3.2.6 and 4.9, Table 3.2-01, Figures 4.9-01 and 4.9-03) and has concluded that depletions are small relative to typical surface flows upstream of the Confluence Aquatic Habitat Area. SMC are not required for those areas because UVRGA has concluded that the small depletions do not cause significant and unreasonable effects.</p> <p>The lower Ventura River and Ventura River Estuary are located in the Lower Ventura River Basin, which is not subject to SGMA due to its low priority status. UVRGA is unaware of any specific concerns downstream of the Upper Ventura River Basin that would be related to groundwater management of the Upper Ventura River Basin and no specific concerns were raised by stakeholders during the GSP development process for consideration.</p>

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110	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	ES-8 Projects and Management Actions Page xxii-xxiii	Regarding the Foster Park Protocols, see comments above. The Draft GSP should also recognize the potential changes to water supply operations associated with the Matilija Dam Removal and Ecosystem Restoration Project (e.g., the retro-fitting of the Robles Diversion and fish passage facilities).	Potential effects that may result following Matilija dam removal will be monitored and considered in future GSP assessments/updates.
111	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	2.2. Description of the Plan Area Page 8	In addition to the agencies listed, we would note that a considerable amount land area is owned and managed by the Ojai Valley Land Conservancy (including land within the Confluence Aquatic Habitat Area GDE).	The Ojai Valley Land Conservancy is introduced in GSP Sections 4.4.2 and 4.9.1, and an addition description has been added to Section 2.2: "The Ojai Valley Land Conservancy (OVLC) manages the Ventura River Preserve, located adjacent to the communities of Meiners Oaks, Rancho Matilija and Mira Monte. The OVLC work to protect and restore open space, wildlife habitat, watersheds, and views of the Ojai Valley for current and future generations."
112	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	2.2.2.2 Existing Water Resource Management Programs Pages 9-11	One of the largest and most significant water-resource-management programs within the Ventura River watershed, the CMWD's water development program, consists of the combined facilities of the Robles Divers (and conjunctively operated Matilija Dam) and Casitas Dam and Reservoir This program and its related facilities should be included in this section because it affects the natural recharge to the other groundwater basins in upper lower Ventura River, as well as the lower Ventura River basin and the Ventura River Estuary (NMFS 2003).	CMWD's Lake Casitas and Robles diversion operations are described in GSP Section 2.2.2.2 and provided in Table 2.2-02.
113	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	2.2.2.3 Conjunctive Use Programs Page 12	The City of Ventura's water supply includes groundwater extractions (as well as surface diversions) and this fact should be noted in the revised GSP. See comment above	The City of Ventura's facilities consist of a subsurface dam and collector system and a series of wells, as described in GSP Section 3.1.1.2.
114	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	2.2.3.1 Land Use/General Plans Pages 13-20	The Draft GSP should also include NMFS' Southern California Steelhead Recovery Plan (2012) which includes essential actions for the recovery of this species that pertain to existing land-use and water management policies. See comments above regarding the relevant policies from NMFS' Southern California Steelhead Recovery Plan.	SGMA requires the GSA to avoid significant and unreasonable effects as determined by the GSA with stakeholder input. Although UVRGA agrees that protecting habitats is important to the health of aquatic species, including steelhead, SGMA does not require GSA to maintain optimal conditions for riverine species, but rather to manage the prevention of significant and unreasonable effects related to groundwater extractions within 20 years. The GSP seeks to avoid significant and unreasonable effects by implementing minimum thresholds for depletion of interconnected surface water that are meant to prevent substantial stress and/or potential mortality for steelhead related to groundwater extractions, and are based on best available science. The minimum thresholds do not preclude other actions that may be taken by other entities to enhance conditions for steelhead, which could optionally be incorporated into a future GSP update.
115	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	2.3 Notice and Communication Pages 22-24	The Draft GSP is focused on out-of-stream users of the Basin and does not adequately recognize the public trust natural resources that may be affected by the extractions of groundwater from the Basin. The GSP is therefore be of interest to state and federal natural resource regulatory agencies such as NMFS, U.,S. Fish and Wildlife Service, and the California Department of Fish and Wildlife, and the California Department of Parks and Recreation (which owns a portion of the Ventura River Estuary).	The following text has been added to the GSP in several places: "UVRGA has considered public trust resources in development of this GSP by considering the impacts to riparian and aquatic groundwater dependent ecosystems, including endangered species therein, and by setting minimum thresholds designed to prevent undesirable results under SGMA."
116	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	2.3.1 Beneficial Uses and Users Pages 23-26	See comments above regarding instream beneficial uses within the Ventura River watershed, including the Basin.	Please see associated responses to above comments.

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117	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	3.1. Hydrogeologic Conception Model Page 30	I In addition to the older alluvium that is generally elevated above the groundwater table directly underlying the alluvial aquifer between the banks of the Ventura River, a large, perhaps a majority of the groundwater collected in the alluvium originates from the upslope portions of the watershed. In effect, the area of the percolation lens that feeds the Basin is more extensive than the two areas identified in the Draft GSP (i.e., alluvial aquifer and the older alluvium). Significantly, not all the wells in the upper Ventura River are located and drilled into the shallow aquifer directly underlying the river channel that is most directly recharged by surface flows in the Ventura River. The GSP should explicitly address these groundwater extractions from the Basin.	The boundaries of the UVRGB have been defined based on SGMA regulations and are described in Section 3.1.3.1.1.
118	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	3.1.2.2 Surface Water Bodies Page 33	In addition to groundwater discharge, hyporheic flows are an important component of surface flows, particularly base flows. These conditions create an interrupted surface flow regime during a large portion of the year in the middle reaches of the Ventura River (from approximately the Robles Diversion down to the confluence of San Antonio Creek), and can be significantly affected by groundwater extractions, particularly from shallow wells.	Hyporheic flows are accounted for in the GSP using the numerical groundwater model (Appendix H). At locations and times where/when the water table is connected to the streambed, hyporheic flows are implicitly modeled as groundwater flow. At locations and times where/when the water table is disconnected from the streambed, hyporheic flows are implicitly modeled as surface water flow.
119	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	Page 34 & 35	Springs along the Ventura River are generally associated with east-west trending faults that run perpendicular to the mainstem. These faults have been mapped, though the production of the springs associated with them have not been measured (Ventura River Watershed Council 2015). Water from Casitas Reservoir is also used in the west end of the City of Ventura that lies outside the Basin (Ventura River Watershed Council 2015). See comment above	Comment noted. The VRWC 2015 reference was considered and reviewed by UVRGA – note, the referenced report was not prepared by a CA licensed professional engineer or geologist.
120	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	3.1.3.2 Groundwater Recharge and Discharge Areas Pages 46-47	See comments above regarding the extent of the groundwater recharge area in the Ventura River watershed.	Please see associated responses to above comments.
121	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	3.1.4 Data Gaps and Uncertainty Page 52	One of the largest data gaps is the rate of surface flow under base flow conditions, including the diurnal changes. Because of their relatively small size and dependence on groundwater and hyporheic flows and groundwater levels, these flows measured in a way that records their seasonal and diurnal fluctuations, and should be a major focus of current and future modeling efforts.	Comment noted. The proposed additional monitoring wells and stream gauges for the monitoring network (Sections 5.3 and 5.8) may provide additional data to assess the diurnal relationship between groundwater and surface water if it is determined to be relevant to management of the Basin.
122	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	3.1.4.4 Primary Beneficial Uses Pages 50-52	See comments above regarding beneficial uses of the groundwater resource of the Basin, and interconnected surface waters.	Please see associated responses to above comments.
123	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	3.2 Groundwater Conditions Pages 54-69	The Draft GSP notes that: "Vertical gradients may exist between the alluvium and the bedrock, but no paired wells screened in the bedrock and alluvial exist to estimate this gradient." p. 55 The Draft GSP does not, but should, provide details regarding the well construction showing the intervals of the well through which groundwater enters the wells. In addition, the revised GSP should clarify whether "sanitary plugs" are installed in the wells that retard or prevent flow through shallow and deep aquifers. See comment above regarding the assertion that "No data gaps or significant uncertainties were identified."	Well construction details are provided in Table 5.3-01.
124	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	3.2.1 Groundwater Elevations Page 55-56	The Draft GSP acknowledges that: "The Basin groundwater level and storage trends closely mimic surface water flows, with groundwater levels and storage exhibiting large and rapid fluctuation relative to the total started thickness and total groundwater storage – more so than perhaps any other groundwater basin in the State." p 56 We would note that base surface flows closely mimic groundwater levels, making the management of groundwater extraction particularly importance in the maintenance of GDE, including habitat for the endangered southern California steelhead.	Comment noted.

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125	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	3.2.2 Change in Storage Page 57	See comments above regarding groundwater elevations	Please see associated responses to above comments.
126	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	3.2.3 Seawater Intrusion Page 58	The Draft GSP notes that: "The UVRGB is an inland groundwater basin, with no connection to the ocean." p. 62 The analysis appears to be focused on the effects of seawater intrusion on the Basin, but does not address the effects of groundwater extraction from the Basin on the lower Ventura River or the estuary. The GSP should address the issue of reducing groundwater levels underlying the lower reaches that are hydrologically connected to the Basin.	The lower Ventura River and Ventura River Estuary are located in the Lower Ventura River Basin, which is not subject to SGMA due to its low priority status. UVRGA is unaware of any specific concerns downstream of the Upper Ventura River Basin that would be related to groundwater management of the Upper Ventura River Basin and no specific concerns were raised by stakeholders during the GSP development process for consideration.
127	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	3.3.4 Groundwater Quality Impacts Pages 58-60	See comments above regarding water quality	Please see associated responses to above comments.
128	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	3.2.6 Interconnected Surface Water Systems Pages 63-65	See comments above regarding interconnected surface waters	Please see associated responses to above comments.
129	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	3.2.7 Groundwater-Dependent Ecosystems Pages 66-69	The Draft GSP relies heavily on the Nature Conservancy's (TNC) guidance for GDE analysis (TNC 2019, 2020). According to this guidance, GDE are defined on their dependence on groundwater for all or a portion of their water needs. The method used by TNC in identifying GDE is based on statewide data on "vegetation known to use groundwater", and therefore does not adequately reflect the uses made of groundwater by other biological resources, such as seasonal migration of fishes, or other organisms such as invertebrates that have differing life-cycles and environmental requirements than plants (TNC 2019, 2020). In addition to supplying water to the root zone of plants, groundwater can also contribute to surface flows, influencing the timing, duration, and magnitude of surface flows, particularly base flows. These base flows provide essential support to aquatic invertebrates, avian fauna, and fish species, including native resident and anadromous fishes. In addition, groundwater that only seasonally supports surface flows can contribute to the life-cycle of migratory fishes, such as steelhead, that can make use of intermittent flows for both migration, spawning and rearing (Erman and Hawthorne 1976, Boughton et al. 2006, 2009). The methodology used in the Draft GSP focuses almost exclusively on vegetation known to use groundwater and, therefore, ignores the seasonal variation in the groundwater levels in the reach of the Ventura River underlain by the Basin that can periodically (seasonally, or intra-annually) exhibit surface flows by affecting their timing magnitude, and duration.	Aquatic GDEs were identified and considered in the GSP, as required by SGMA. Appendix P details the identification and assessment of aquatic GDEs, which are addressed by the SMC for the depletion of interconnected surface water sustainability indicator (GSP Section 4.9).
130	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	3.2.7 Groundwater-Dependent Ecosystems Pages 66-69	As a result, the Draft GSP only identified 5 potential GDE and included only two for further consideration in the formulation of sustainable management criteria: 1) Confluence Aquatic Habitat Area and 2) Foster Park Aquatic Habitat Area. This limited view of the GDE does not accurately reflect the use of the river reach within the Basin by endangered southern California steelhead. Steelhead use the entire reach of the Ventura River within the Basin for completing their life-cycle. The GSP should be revised to recognize the role that groundwater plays in supporting base flows that support other GDE, including those used by steelhead	UVRGA has quantified depletion of surface water throughout the Basin (Appendix N; GSP Section 3.2.6 and 4.9, Table 3.2-01, Figures 4.9-01 and 4.9-03) and has concluded that depletions are small relative to typical surface flows upstream of the Confluence Aquatic Habitat Area. SMC are not required for those areas because UVRGA has concluded that the small depletions do not cause significant and unreasonable effects.

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131	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	3.3 Water Budget Pages 70-75	See comments above regarding the water budget for the Basin	Please see associated responses to above comments.
132	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	3.3.1 Historical Water Budget Pages 76-82	The Draft GSP notes that: "The SGMA Regulations require that the historical surface water and groundwater budget be based on a minimum of 10 years of historical data." p. 79 The Draft GSP does not refer to or account for the effects of the operation of the CMWD's Robles Diversion on the Upper Ventura River, which supplies on average 45% of the total amount of water diverted and stored in the Casitas reservoir acre-feet per year from the main stem of the Ventura River (NMFS 2003, Ventura River Watershed Council 2015). This diversion operation affects recharge to all of the Ventura River groundwater basins, not just the Basin, including the shallow alluvial aquifer and the other deeper aquifers within Basin. These operations have the potential to impact endangered adult and juvenile steelhead in the upper Ventura River and estuary (NMFS 2003, 2007). The Draft GSP should therefore include as part of its water-budget analysis the operations of the Robles Diversion. Specifically, the relationship of groundwater management activities (including both recharge and groundwater extraction activities) and the effects of the related Robles Diversion on surface flows below the diversion and the maintenance of surface flows supported by groundwater should be explicitly addressed a in the revised GSP.	The numerical modeling analysis performed for the GSP and resulting water budgets account for Robles Diversion operations, as described in Appendix H and Section 3.3. It is noted that SGMA does not require GSAs to analyze the effects of surface water diversions on beneficial users and users of water and the GSA has no regulatory authority over surface water diversions.
133	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	3.3.2 Current Water Budget Pages 84-86	As noted above, the Draft GSP does not refer to or account for the effects of the operation of the CMWD's Robles Diversion on the upper Ventura River, but should as part of its current water budget. See comments above regarding the CMWD's Robles Diversion.	Please see response to above comment.
134	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	3.3.3 Projected Water Budget Pages 84-91	As noted above, the Draft GSP does not refer to or account for the effects of the operation of the CMWD's Robles Diversion on the upper Ventura River, but should be included as part of its projected water budget. See comments above regarding the CMWD's Robles Diversion.	Please see response to above comment.
135	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	3.3.4.1 Overdraft Assessment Page 91	The Draft GSP notes that: "The water budget result do not indicate an overdraft condition in the Basin currently or in the future. Numerical model results for the projected water budge indicate the groundwater level will continue to fully recovery following droughts." p. 91 As noted above, this analysis does not take into account the effects of either the protracted drought or the past unregulated extraction of groundwater, or the differing effects of temporary drawn of the groundwater table on traditional out-of-stream beneficial uses and instream beneficial uses of the waters of the Ventura River watershed.	The GSP complies with the SGMA requirements for water budgets contained in the GSP Emergency Regulations.

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136	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	4.2 Sustainability Goal Pages 90-100	The Draft GSP states, in part, that: "The goal of this Groundwater Sustainability Plan (GSP) is to sustainably manage the groundwater resources of the Upper Ventura River Basin for the benefit of current and anticipated future beneficial users of groundwater, including the environment and the welfare of the general public who rely directly or indirectly on groundwater. Sustainable groundwater management will ensure the long-term reliability of the Upper Ventura River Basin groundwater resources by avoiding undesirable results pursuant to the Sustainable Groundwater Management Act (SGMA) no later than 20 years from Plan adoption and through implementation of a data-driven and performance-based adaptive management framework." p. 94 Nothing in the language of the goal specifically refers to the protection of instream beneficial uses associated with the GDE of the Basin, such as the upper Ventura River or the downstream reaches of the Ventura River, including the Ventura River Estuary. This appears to be the result, in part, of not fully recognizing interconnected surface waters or GDE within the boundaries of the Basin. However, as noted above, the Basin contains interconnected surface water and GDE beyond the two that are identified for sustainable management criteria. See comments above, and Figures 1 and 2, regarding the extent of steelhead habitat within the Ventura River watershed, including within the boundaries of the Basin.	The goal states, "including the environment . . . who rely directly or indirectly on groundwater", which includes instream beneficial uses.
137	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	4.2 Sustainability Goal Pages 90-100	See comments above regarding groundwater Basin dynamics	Please see associated responses to above comments.
138	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	4.2 Sustainability Goal Pages 90-100	The discussion in this section is focused on out-of-stream beneficial uses of the groundwater resources of the Basin. It does not directly address the instream beneficial uses of interest to state and federal natural resource regulatory agencies such as NMFS, U.S. Fish and Wildlife Service, and the California Department of Fish and Wildlife, and the California Department of Parks and Recreation. These would include, but are not limited to, the GDE associated with the upper Ventura River, lower Ventura and the Ventura River Estuary. The causes that could lead to undesirable results should include the operations of CMWD's Robles Diversion on the upper Ventura River. See comments above, particularly regarding GDE.	Please see response to comment 136. It is also noted that surface water beneficial uses are detailed in GSP Section 4.9.1 and aquatic GDEs were identified and considered in the GSP, as required by SGMA. Appendix P details the identification and assessment of aquatic GDEs, which are addressed the sustainable management criteria for the depletions of interconnected surface water sustainability indicator (GSP Section 4.9). The lower Ventura River and Ventura River Estuary are located in the Lower Ventura River Basin, which is not subject to SGMA due to its low priority status. UVRGA is unaware of any specific concerns downstream of the Upper Ventura River Basin that would be related to groundwater management of the Upper Ventura River Basin and no specific concerns were raised by stakeholders during the GSP development process for consideration.
139	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	4.2 Sustainability Goal Pages 90-100	None of the minimum thresholds in the Draft GSP addresses specifically the endangered southern California steelhead (other than the Foster Park Aquatic Habitat Area GDE). As noted, this standard is not supported by the best available science. This is a significant omission from the Draft GSP that should be addressed in the revised Draft GSP for the Basin.	The SMC for the depletion of interconnected surface water considered the effects on aquatic GDEs, which include steelhead (See GSP section 4.9.1). Streamflow depletion was assessed using the numerical groundwater model, which was calibrated to measured streamflow and groundwater levels in the Basin (Appendix H) and follows SGMA requirements. UVRGA used the numerical model to quantify depletion of surface water throughout the Basin (Appendix N; GSP Section 3.2.6 and 4.9, Table 3.2-01, Figures 4.9-01 and 4.9-03) and has concluded that depletions are small relative to typical surface flows upstream of the Confluence Aquatic Habitat Area. SMC are not required for those areas because UVRGA has concluded that the small depletions do not cause significant and unreasonable effects.
140	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	4.2 Sustainability Goal Pages 90-100	See comments above regarding the interest of state and federal natural resource regulatory agencies such as NMFS, U.S. Fish and Wildlife Service, and the California Department of Fish and Wildlife, and the California Department of Parks and Recreation (which owns a portion of the Ventura River Estuary).	The following text has been added to the GSP in several places: "UVRGA has considered public trust resources in development of this GSP by considering the impacts to riparian and aquatic groundwater dependent ecosystems, including endangered species therein, and by setting minimum thresholds designed to prevent undesirable results under SGMA."

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141	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	4.2 Sustainability Goal Pages 90-100	The Draft GSP states that: "UVRG is unaware of any federal, state, or local standards for chronic lowering of groundwater levels." P. 104 While there is no general numeric standards for chronic lowering of groundwater levels, this statement fails to recognize the over-arching standards established by SGMA, particularly those intended to protect GDE.	This statement is included in the GSP to comply with CCR §354.28(b)(5).
142	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	4.2 Sustainability Goal Pages 90-100	The Draft GSP indicates that: "Groundwater elevations will be directly measured to determine their relation to minimum thresholds. Groundwater level monitoring will be conducted in accordance with the monitoring plan outlined in Section 5." P. 111 The groundwater-monitoring plan only provides for annual monitoring. A more appropriate approach would be to monitor seasonally to account for the strong effect of seasonal changes in hydrologic and hydraulic conditions that are of significant to GDE, including, but not limited to, those associated with the Basin. For example, monitoring towards the end of summer or beginning of fall, as well as the beginning of spring each year could help inform groundwater and other natural resource managers of the effects of both recharge (natural and artificial) as well as groundwater pumping patterns on GDE within the Basin. Without shallow groundwater wells that would provide specific data on the relationship between groundwater levels and surface flows, a reliable assessment of the effects of extracting groundwater from these areas on GDE is not possible. This is a significant data gap that could be addressed by the installation of shallow groundwater wells (or piezometers) to better describe these relationships. Additionally, data gathered from groundwater well monitoring should be correlated with stream flow in the upper Ventura River. This can and should be accomplished by added a stream flow gauges capable of monitoring base flows in the upper Ventura	The groundwater monitoring program includes quarterly manual measurements in addition to transducer data (see Table 5.3-01), which is a continuous measurement. The GSP complies with CCR §354.34(b).
143	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	4.2 Sustainability Goal Pages 90-100	The Draft GSP indicates that: "The chronic lowering of groundwater levels measurable objectives were developed by applying the concept of providing a reasonable margin of operational flexibility under adverse conditions." P. 105 This strategy is more suitable for managing traditional out-of-stream beneficial uses that instream beneficial uses associated with GDE, including river flows for the endangered southern California steelhead. See additional comments above.	Instream beneficial uses are addressed by the SMC for the depletion of interconnected surface water sustainability indicator, GSP Section 4.9.
144	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	4.2 Sustainability Goal Pages 90-100	The Draft GSP states that: "The evaluation of potential effects on beneficial uses and users, and property interests for the reduction of groundwater storage sustainability indicate is the same as for chronic lowering of groundwater levels and depletions of interconnected surface water sustainability criteria and its incorporated by reference" p. 108 As noted previously, the Draft GSP should be revised to explicitly acknowledge all the instream beneficial uses supported by the Basin. The recognized instream beneficial uses for the portion of the upper Ventura River include: warm freshwater habitat, cold freshwater habitat, wildlife habitat, habitat for rare, threatened and endangered species, fish migration, and wetland habitat. See comments above, and Figures 1 and 2, regarding the extent of steelhead habitats within the Ventura River Watershed, including the Basin.	Instream beneficial uses are addressed by the SMC for the depletion of interconnected surface water sustainability indicator, GSP Section 4.9.

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145	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	4.5.1 Undesirable Results Page 108	The Draft GSP states that: "The criteria used to define undesirable results for the reduction of groundwater storage sustainability indicator are based on the qualitative description of undesirable results, which is causing other sustainability indicators to have undesirable results. As explained in Section 4.5.2, groundwater levels will be used as a proxy for the reduction of groundwater storage sustainability indicator minimum thresholds. Based on the foregoing, the combination of minimum threshold exceedances that is deemed to cause significant and unreasonable effects in the basin for the reduction of groundwater storage sustainability indicator is the same as the combinations deemed to cause undesirable results for the chronic lowering of the groundwater levels sustainability indicator (Table 4.1-01)." p. 108 While groundwater levels are an important indicator of the general condition of the Basin, there are other more meaningful metrics specifically aimed at informing management of the Basin for the protection of instream beneficial uses associated with GDE (e.g., base flow rates, pool depth, stream width, depth across riffles, etc.) Specifically, the current approach is based on criteria that do not, but should, address whether there may be significant stream flow depletion or lowered water surface elevation (from a biological perspective) caused by groundwater pumping within the Basin.	Instream beneficial uses are addressed by the SMC for the depletion of interconnected surface water sustainability indicator, GSP Section 4.9.
146	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	4.5.2.3 Relationships Between Minimum Thresholds and Sustainability Indicators Page 110	The Draft GSP indicates that: "The relationships between the minimum thresholds for the reduction of groundwater storage sustainability indicator and other sustainability indicators are the same as the potential effects of the minimum thresholds for the chronic lowering of groundwater levels on the other sustainability indicators . . ." p. 110 This approach and analysis may be appropriate when considering groundwater supplies for out-of-stream beneficial uses for which there may be alternatives. However, it does not take into account the adverse effects of periodic reduction of groundwater on GDE, including the use by migrating, spawning or rearing steelhead. The effects of periodic groundwater reductions on out-of-stream beneficial uses (e.g., domestic or agricultural water supplies) may be addressed with alternative water sources. However, instream uses such as GDE are more vulnerable to periodic groundwater reductions, because there is generally no alternative water source to sustain the GDE, and even a short-term depletion or limitation of stream flow or water surface elevation can be lethal to aquatic species	Instream beneficial uses are addressed by the SMC for the depletion of interconnected surface water sustainability indicator, GSP Section 4.9.
147	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	4.5.2.5 Impact of Minimum Thresholds on Beneficial Uses and Users Page 110	See comment above regarding the relationship between Minimum Thresholds and Sustainability Indicators.	Please see response to above comment.
148	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	4.5.2.6 Current Standards Relevant to Sustainability Indicator Page 110	As noted above, while there are no numeric standards, this statement does not appear to recognize the standards that are established by SGMA, particularly regarding GDE.	Please see response to above comment #141
149	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	4.5.2.7 Measurement of Minimum Thresholds Page 111	See the comments above regarding "Minimum Thresholds", "Criteria Used to Define Undesirable Results" and "Relationship Between Minimum Thresholds and Sustainability Indicators."	Please see associated responses to above comments.

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150	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	4.5.3 Measurable Objectives and Interim Milestones Page 111	See the comments above regarding "Minimum Thresholds", "Criteria Used to Define Undesirable Results" and "Relationship Between Minimum Thresholds and Sustainability Indicators."	Please see associated responses to above comments.
151	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	4.6 Seawater Intrusion Page 112	See comment above regarding the seawater intrusion.	There is no comment above regarding the seawater intrusion.
152	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	Criteria Used to Define Undesirable Results Page 114	See the comments above regarding "Minimum Thresholds", "Criteria Used to Define Undesirable Results" and "Relationship Between Minimum Thresholds and Sustainability Indicators."	Please see associated responses to above comments.
153	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	4.6.2.1 Information and Criteria to Define Minimum Thresholds Page 115	See the comments above regarding "Minimum Thresholds", "Criteria Used to Define Undesirable Results" and "Relationship Between Minimum Thresholds and Sustainability Indicators."	Please see associated responses to above comments.
154	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	4.7.2.2 Relationship s Between Minimum Thresholds and Sustainabilit y Indicators Page 119	As noted above, the groundwater extraction from the Basin can affect recharge of the groundwater basin underlying the lower Ventura River and Ventura River Estuary.	The lower Ventura River and Ventura River Estuary are located in the Lower Ventura River Basin, which is not subject to SGMA due to its low priority status. UVRGA is unaware of any specific concerns downstream of the Upper Ventura River Basin that would be related to groundwater management of the Upper Ventura River Basin and no specific concerns were raised by stakeholders during the GSP development process for consideration.
155	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	4.7.2.3 Minimum Thresholds in Relation to Adjacent Basins Page 119	See comment above.	Please see associated responses to above comments.
156	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	4.7.2.4 Impact of Minimum Thresholds on Beneficial Uses and Users Page 120	See the comments above regarding "Minimum Thresholds", "Criteria Used to Define Undesirable Results" and "Relationship Between Minimum Thresholds and Sustainability Indicators."	Please see associated responses to above comments.
157	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	4.7.2.5Curre nt Standards Relevant to Sustainabilit y Indicator Page 120	As noted, the Draft GSP does not appear to recognize the broad standards that that are established by SGMA.	Please see response to above comment #141.

Comment Number	Entry Date	First Name	Last Name	Email Address	Phone Number	Mailing Address	GSP Referenced	Comment/Question	Response
158	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	4.6.2.6 Measurement of Minimum Thresholds Page 121	See the comments above regarding "Minimum Thresholds", "Criteria Used to Define Undesirable Results" and "Relationship Between Minimum Thresholds and Sustainability Indicators."	Please see associated responses to above comments.
159	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	4.7.3 Measurable Objectives and Interim Milestones Page 121	See the comments above regarding "Minimum Thresholds", "Criteria Used to Define Undesirable Results" and "Relationship Between Minimum Thresholds and Sustainability Indicators."	Please see associated responses to above comments.
160	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	4.9 Depletion of Interconnected Surface Water Pages 123-124	See comments above regarding interconnected surface water and GDE.	Please see associated responses to above comments.
161	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	Process and Criteria for Defining Undesirable Results Page 124	See comments above regarding the interest of state and federal natural resource regulatory agencies such as NMFS, U.S. Fish and Wildlife Service, and the California Department of Fish and Wildlife, and the California Department of Parks and Recreation (which owns a portion of the Ventura River Estuary).	Please see associated responses to above comments.
162	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	Evaluation of Potential Effects on Beneficial Uses and Users, Land Uses, and Property Interests Page 125	As noted previously, the Draft GSP should be revised to explicitly acknowledge the instream beneficial uses supported by the Basin, including the GDE associated with the upper reaches and middle of Ventura River. See comment above regarding "Process and Criteria for Defining Undesirable Results."	The identification and assessment of GDEs are thoroughly documented in Appendices O and P. Further, UVRGA has quantified depletion of surface water throughout the Basin (Appendix N; GSP Section 3.2.6 and 4.9, Table 3.2-01, Figures 4.9-01 and 4.9-03) and has concluded that depletions are small relative to typical surface flows upstream of the Confluence Aquatic Habitat Area. SMC are not required for those areas because UVRGA has concluded that the small depletions do not cause significant and unreasonable effects. Instream beneficial uses are addressed by the sustainable management criteria for depletions of interconnected surface water, Section 4.9.
163	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	Effects on Surface Water Diversions Page 126	See the discussion above regarding the City of Ventura's Foster Park well field and the CMWD's Robles Diversion.	The numerical modeling analysis performed for the GSP accounts for Robles Diversion and Foster Park operations, as described in Appendix H and Sections 3.3 and 4.9.
164	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	Effects on Aquatic GDEs Page 127	The Draft GSP only identified 5 potential GDE and included only two for further consideration in the formulation of sustainable management criteria: 1) Confluence Aquatic Habitat Area and 2) Foster Park Aquatic Habitat Area. This limited recognition of GDE does not accurately reflect the use of the river reach within the Basin by endangered steelhead. Steelhead use the entire reach of the Ventura River within the Basin for completing their life-cycle. See Figures 1 and 2 for a depiction of the designated critical habitat and intrinsic potential habitat within the Ventura River watershed, including the Basin.	UVRGA has quantified depletion of surface water throughout the Basin (Appendix N; GSP Section 3.2.6 and 4.9, Table 3.2-01, Figures 4.9-01 and 4.9-03) and has concluded that depletions are small relative to typical surface flows upstream of the Confluence Aquatic Habitat Area. SMC are not required for those areas because UVRGA has concluded that the small depletions do not cause significant and unreasonable effects.

Comment Number	Entry Date	First Name	Last Name	Email Address	Phone Number	Mailing Address	GSP Referenced	Comment/Question	Response
165	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	Confluence Habitat Area Page 127	The Draft GSP's assertion that because the Basin has 20 years to achieve sustainable management, there is ample time available to implement appropriate management of the groundwater levels associated with the Confluence Habitat Area does not appropriately recognize the endangered status of the steelhead that utilize and occupy the Ventura River, including the area the Confluence Habitat Area. This statement reflects the same perspective that was expressed in the assertion that the periodic depletion of the Basin is acceptable or reasonable because the Basin has the ability to refill rapidly. As noted above, instream beneficial uses such as GDE are more vulnerable to periodic groundwater reductions, because there is generally no alternative water source to sustain the GDE during periodic periods of groundwater depletion. Even a short-term depletion or limitation of stream flow or water surface elevation can be lethal to aquatic species.	The GSP, including the timing of actions to meet the SGMA mandate to achieve sustainable groundwater management within 20-years of GSP adoption, are compliant with SGMA regulations. The GSP does not preclude other actions that may be taken by other entities to enhance conditions for steelhead, which could optionally be incorporated into a future GSP update.
166	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	Foster Park Habitat Area Page 128	See the discussion above regarding the City of Ventura's Foster Park well field, as well as the discussion below under Section 6.0., Project and Management Actions.	Please see associated responses to above comments.
167	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	4.9.2 Minimum Thresholds Page 131	See the comments above regarding "Minimum Thresholds", "Criteria Used to Define Undesirable Results" and "Relationship Between Minimum Thresholds and Sustainability Indicators."	Please see associated responses to above comments.
168	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	4.10 Measurable Objectives and Interim Milestones for Additional Plan Elements Page 136	The Draft GSP indicates that "No additional plan elements that have measurable objectives are include in the GSP". P. 136. See the comments above regarding the Confluence Habitat Area, Foster Park Habitat Area, and other GDE within the Basin, which are not adequately addressed.	The cited language is included in the GSP to address GSP Emergency Regulations §354.30(f). The comment is not applicable to GSP Emergency Regulations §354.30(f).
169	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	5.0 Monitoring Networks Pages 137-154	As noted above, the monitoring proposed is aimed at addressing the limited Sustainable Management Criteria. There is nothing identified in the monitoring program that addresses the potential effects of groundwater extractions on GDE (with the exceptions of the Confluence Habitat Area and the Foster Park Habitat Area) within the Basin. Shallow groundwater wells within the alluvial overlaying the Basin would provide specific data on relationship between groundwater levels and surface flows. This appears to be a significant data gap that should be addressed by the installation of shallow groundwater wells (or piezometers) to better described these relationships.	UVRGA has quantified depletion of surface water throughout the Basin (Appendix N; GSP Section 3.2.6 and 4.9, Table 3.2-01, Figures 4.9-01 and 4.9-03) and has concluded that depletions are small relative to typical surface flows upstream of the Confluence Aquatic Habitat Area. SMC are not required for those areas because UVRGA has concluded that the small depletions do not cause significant and unreasonable effects. For these reasons, monitoring is not a priority in these areas. The GSP describes the plan to add 5 monitoring wells and 3 stream gages to the existing monitoring network (Sections 5.3 and 5.8), with the purpose of correlating groundwater levels with streamflow and updating the numerical groundwater model to enhance the calculation of streamflow depletion. The installation of the monitoring network additions is included in the final GSP as projects in Section 6. As discussed in the GSP, monitoring is prioritized in areas where the greatest potential for significant and unreasonable effects exists.

Comment Number	Entry Date	First Name	Last Name	Email Address	Phone Number	Mailing Address	GSP Referenced	Comment/Question	Response
170	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	6.3 Foster Park Protocols to Address Direct Depletion of Interconnected Surface Water Pages 163-173	It should be recognized that NMFS was not a party to the settlement agreement between Santa Barbara Channel Keep and the State Water Resources Control Board and the City of San Buenaventura, and has not reviewed or endorsed that settlement agreement which uses a different (lower) minimum flow standard recommended by NMFS for the operation of the City's Foster Park well field. See the comments above regarding the City of Ventura's Foster Park Well Field.	Comment noted.
171	8-Dec-21	Anthony Mark	Spina Capelli	mark.capelli@noaa.gov	805-963-6478	National Marine Fisheries Service West Coast Region 501 West Ocean Boulevard, Suite 4200 Long Beach, CA, 90802	7.0 GSP Implementation Pages 174-183	See comment above regarding "Projects and Management Actions".	Please see associated responses to above comments.

Bryan Bondy

From: Upper Ventura River Groundwater Agency <sward@uvrgroundwater.org>
Sent: Wednesday, February 3, 2021 6:00 PM
To: Summer Ward
Subject: GSP Comment/Question

GSP Comment/Question Form

Last Name: Pitterle

Santa Barbara Channelkeeper Comments (2-3-2021)

First Name: Benjamin

Email Address: ben@sbck.org

Confirm Email Address: ben@sbck.org

Phone: 805-636-6189

Mailing Address:
714 Bond Avenue
Santa Barbara, CA 93103
United States of America

**GSP Section for
Comment/Question:**

4.4.2 Minimum Thresholds

1

Significant and unreasonable effects impacting surface water quality are caused by groundwater conditions throughout portions of the basin. Lowering of groundwater levels reduces surface flows. Reduced surface flows may cause water quality conditions that do not support beneficial uses. Such water quality conditions include lowered dissolved oxygen and increased temperatures. These flow-related impacts are highlighted in various watershed studies including the TMDL for Algae, Eutrophic Conditions, and Nutrients in the Ventura River. Water quality impacts to interconnected surface waters due to groundwater pumping should be addressed within the Groundwater Sustainability Plan. The Draft Sustainable Management Criteria for Degraded Water Quality acknowledges this surface-groundwater interdependence related to nitrate. The GSP should similarly address interdependences related to dissolved oxygen and temperature. Thank you for your consideration.

GSP Comment/Question:

**Would you like to join the UVRGA
Official Interested Parties List?:**

Yes

Beneficial Uses:

Environment

This email was built and sent using [Visual Form Builder](#).

DATE: 6-18-2021

TO: Brian Bondy, UVRGSA

FROM: Paul Jenkin

RE: **Early Comments on Draft Supporting Documents for Upper Ventura River Groundwater Sustainability Plan**

This memo is a follow up from our conversation regarding development of the Groundwater Sustainability Plan (GSP). The primary concern we discussed is the elimination of large portions of the basin from SGMA oversight through the assumption that surface water is somehow “disconnected” from groundwater. Apart from the fact that there are fundamental flaws in the methodology used to make this determination, the resulting conclusions and management criteria are not consistent with avoiding undesirable results.

2

The primary Sustainable Management Criteria (SMC) for the UVRGB is the **Depletion of Interconnected Surface Water**. The analyses presented to date do not adequately assess the groundwater/surface water interactions within and between the different reaches of the basin, or even acknowledge the impact of groundwater pumping on surface flows.

4

Screening Groundwater Dependent Ecosystems (GDEs)

The Upper Ventura River Groundwater Basin is a shallow alluvial aquifer integral to the riparian floodplain ecosystem of the main stem Ventura River. Throughout these reaches of the river, groundwater and surface water are connected, and to suggest they are not is to undermine the intent of the Sustainable Groundwater Management Act.

3

The **Riparian Groundwater Dependent Ecosystems Assessment** Report characterizes the Robles reach as a “*Losing reach with generally disconnected groundwater- surface water.*” This categorization eliminates the majority of this Groundwater Dependent Ecosystem from consideration under SGMA by assuming that it is “disconnected” and thus has too great a depth to groundwater to support riparian habitat. Other reaches are similarly dismissed.

5

The analysis presented relies heavily on the Nature Conservancy “Natural Communities (NC) Dataset,” using vegetation communities to eliminate GDE polygons from the Upper Ventura River Groundwater Basin. The NC dataset is a statewide geographic computer database that maps vegetation types in all potential GDEs throughout the State of California. The large geographic scope of this map does not accurately represent current on-the-ground conditions, and more robust ground truthing should be undertaken. Even the aerial photos presented tell a different story than is acknowledged in the narrative (i.e. Figure 6 North Robles Habitat Area Photographs, Aquatic GDE Characterization report)

6

Unfortunately, the UVRGSA analysis does not fully implement the **Best Practices for using the NC Dataset** guidance provided by the Nature Conservancy, which presents six best practices for using local groundwater data to confirm whether mapped features in the NC dataset are supported by groundwater. ([Best Practices for using the NC Dataset, TNC July 2019](#))

7

According to this guidance:

While depth-to-groundwater levels within 30 feet of the land surface are generally accepted as being a proxy for confirming that polygons in the NC dataset are supported by groundwater, **it is highly advised that fluctuations in the groundwater regime be characterized to understand the seasonal and interannual groundwater variability in GDEs.** (see Best Practice #2.)

one of the key factors to consider when mapping GDEs is to contour depth-to-groundwater in the aquifer that is supporting the ecosystem (see Best Practice #5).

7

The **GIS Spatial Analysis of Maximum Rooting Depth and Groundwater Level** presented in the Riparian GDE document **does not present such contour depth-to-groundwater mapping or account for temporal variability.**

8

*In many situations, the hydrologic connection of NC dataset polygons will not initially be clearly understood if site-specific groundwater monitoring data are not available. If sufficient data are not available in time for the 2020/2022 plan, **The Nature Conservancy strongly advises that questionable polygons from the NC dataset be included in the GSP until data gaps are reconciled in the monitoring network.** Erring on the side of caution will help minimize inadvertent impacts to GDEs as a result of groundwater use and management actions during SGMA implementation.*

Furthermore, TNC guidance acknowledges that;

Many of California’s GDEs have adapted to dealing with intermittent periods of water stress, however if these groundwater conditions are prolonged, adverse impacts to GDEs can result.

Therefore, it is likely that the NC vegetation mapping is representative of conditions in which groundwater levels have been frequently and repeatedly pumped beyond the reach of riparian tree roots. Meanwhile, field observations over the past few wetter years show that the riparian vegetation has rebounded, illustrating how the ecosystem responds with the variation in water years. Receding groundwater levels and corresponding loss of surface flows in the current drought will likely reverse this recent trend, with the potential loss of the many young sycamores.

9

Determining Groundwater/Surface water interactions

TNC guidance for determining GDEs recognizes the importance of surface flows;

*In addition, SGMA requires that significant and undesirable adverse impacts to beneficial users of surface water be avoided. **Beneficial users of surface water include environmental users such as plants or animals, which therefore must be considered when developing minimum thresholds for depletions of interconnected surface water.***

10

The **Model Results and SMC Implications Presentation (March 25, 2021)** reaches the conclusion that:

11

- Basin water budget is dominated by streamflow percolation into the Basin and groundwater discharge to Ventura River
- GW pumping averages only ~10% of the GW Budget As low as 4% in wet years Up to 31% in dry years
- Basin GW levels will be lower in dry seasons, but Basin will still re-fill in normal to wet years

11

The conclusion that there is no impact from pumping based on the fact that the basin rapidly refills in the wet season points to the likelihood that the surface water is in fact “connected” to groundwater during these periods. Moreover, the fact that pumping represents up to 31% of the budget in the critical dry years raises many questions.

The Model Results identify four areas of concentrated pumping, three of which directly impact groundwater levels in the “Robles Reach.” This reach is the area with the most storage in the basin, and should be considered as the “primary sub-basin” for water supply. Pumping in this reach directly affects conditions throughout the basin.

12

The analyses and graphs presented in the Model Results do not provide information on the spacial and temporal surface flow conditions as they relate to groundwater levels. Because the downstream reaches are largely dependent on surface and groundwater flows out of this sub-basin, further analysis is needed to more clearly define the relationship between groundwater levels and surface flows. The analyses should, at a minimum, determine threshold groundwater levels at which surface flows are diminished or eliminated, both in the reach being monitored and downstream.

This relationship was established decades ago in the [Ventura River Conjunctive Use Report \(1978\)](#) which states that;

Flows in the live stretch are affected by both the rate of recharge of the upper part of the Ventura River groundwater basin and by the rate of groundwater extraction from wells in the river.

13

Investigations published in the Conjunctive Use Report identified groundwater elevation thresholds in the upper basin at which flows in the live reach will cease;

when the water level in well 4N23W16C4 falls below Elevation 495, surface flow in much of the live stretch stops although some pools remain. A flow of 1 cfs or more in the live stretch corresponds with a water level in this well of greater than about Elevation 507.

Groundwater levels also affect surface flows in the Robles Reach, which frequently dries up despite constant inflows. Unfortunately, the **Aquatic GDE Impact Analysis** is quick to dismiss the effect of groundwater elevation on surface flows;

No monitoring is recommended at either of the critical riffle aquatic GDEs or the Robles Habitat Area, as impacts from pumping in these areas were determined to be minimal or non-existent.

14

This conclusion is inconsistent with the guidance provided in [Monitoring Networks and Identification of Data Gaps BMP \(DWR 2016\)](#) which states:

23 CCR §354.34(c)(6): Depletions of Interconnected Surface Water. Monitor surface water and groundwater, where interconnected surface water conditions exist, to characterize the spatial and temporal exchanges between surface water and groundwater, and to calibrate and apply the tools and methods necessary to calculate depletions of surface water caused by groundwater extractions. The monitoring network shall be able to characterize the following:

- (A) Flow conditions including surface water discharge, surface water head, and baseflow contribution.
- (B) Identifying the approximate date and location where ephemeral or intermittent flowing streams and rivers cease to flow, if applicable.
- (C) Temporal change in conditions due to variations in stream discharge and regional groundwater extraction.
- (D) Other factors that may be necessary to identify adverse impacts on beneficial uses of the surface water.

14

DWR guidance provides detailed information on developing a monitoring network to accurately assess these concerns.

Establishing Minimum Flow Thresholds

As described above, the current GSP analysis incorrectly concludes that groundwater pumping has little to no effect on surface flows throughout the majority of the basin. But even for the identified groundwater dependent “Habitat Areas,” the development of minimum flow thresholds is inadequate. For example;

For the Foster Park Habitat Area, while the City's low-flow thresholds are based on only one HSI score evaluated in the Padre study (average thalweg depth), we understand this currently provides the best available information to establish minimum thresholds for the depletion of interconnected surface water sustainability criteria.

15

This statement ignores best available science, including the recently published CDFW Draft Instream Flow Recommendations (2021) as well as the NMFS Draft Biological Opinion for Foster Park Wellfield (2005).

Implications for the UVR Groundwater Sustainability Plan

According to the [Brownstein Water Group](#), the Cuyama Valley Basin and the Paso Robles Area Subbasin GSPs were recently deemed incomplete for deficiencies in their definitions of sustainable management criteria (SMC), including minimum thresholds and undesirable results. Some of the concerns cited by DWR are that the GSP;

- *provides insufficient detail for how it determined that the selected minimum thresholds . . . are consistent with avoiding undesirable results*
- *does not relate different minimum thresholds for different portions of the basin to conditions that could cause undesirable results*
- *does not sufficiently discuss expected impacts and therefore “precludes meaningful disclosure to, and participation by, interested parties and residents in the Basin.*

16

It is clear from these recent DWR determinations that much more work is needed to develop and present a clear understanding of the workings of the Upper Ventura River Groundwater Basin, the potential impacts from groundwater pumping, and a plan to better manage the limited resource to ensure future sustainability and a healthy ecosystem.

16

Recommendation:

These initial comments are provided as requested, in good faith, prior to the release of the Draft GSP in the interest of stakeholder engagement and with the hopes that the UVRGSA is able to augment the current analysis and develop a meaningful assessment of the impact of groundwater pumping on surface flows in the Ventura River. It is clear that this will be necessary to successfully develop the Groundwater Sustainability Plan to a level that satisfies the objectives of the Sustainable Groundwater Management Act (SGMA) in order to gain the support of local stakeholders and approval by the California Department of Water Resources.

17

DATE: October 8, 2021
TO: Brian Bondy, UVRGSA
FROM: Paul Jenkin, Surfrider Foundation
RE: **Comments on Draft Upper Ventura River Groundwater Sustainability Plan**

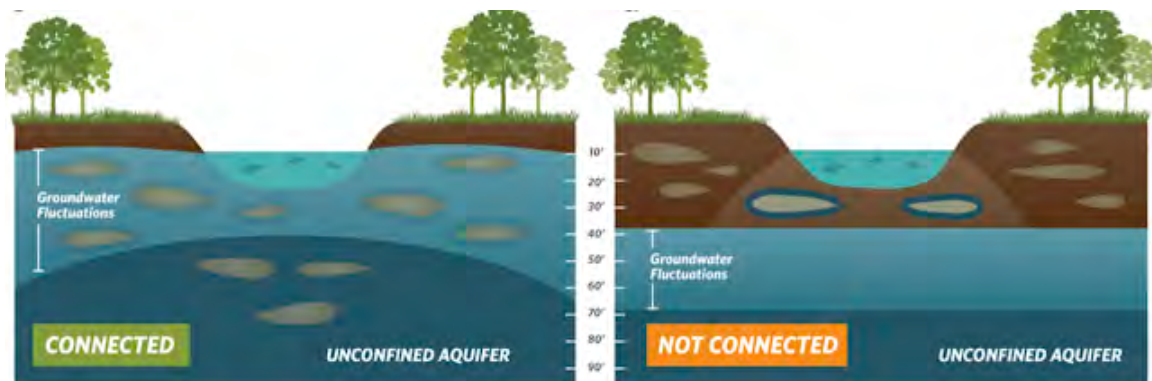
Dear Mr Bondy,

Thanks for the opportunity to review the Draft **Upper Ventura River Groundwater Sustainability Plan (GSP)**. The Surfrider Foundation recognizes that sustainable management of coastal watersheds is critical to the protection and enhancement of our oceans, waves, and beaches. We have been engaged in issues affecting the Ventura River since the Ventura County Chapter was founded in 1991.

- 4 Upon review of the GSP it is clear that the primary Sustainable Management Criteria (SMC) for the Upper Ventura River Groundwater Basin (UVRGB) is the **Depletion of Interconnected Surface Water**. The analyses presented do not adequately assess the groundwater/surface water interactions within and between the different reaches of the basin or acknowledge the impact of groundwater pumping on surface flows.

Screening Groundwater Dependent Ecosystems (GDEs)

The Upper Ventura River Groundwater Basin is a shallow alluvial aquifer integral to the riparian floodplain ecosystem of the main stem Ventura River.



Confirming whether an ecosystem is connected to groundwater, TNC

- 5 The **Riparian Groundwater Dependent Ecosystems Assessment** Report characterizes the Robles reach as a *“Losing reach with generally disconnected groundwater- surface water.”* This categorization eliminates the majority of this Groundwater Dependent Ecosystem from consideration under SGMA by assuming that it is “disconnected” and thus has too great a depth to groundwater to support riparian habitat. Other reaches are similarly dismissed.

Figure 2 Potential Riparian GDEs, Hydrogeologic Areas, and Interconnected Surface Water Systems within the UVRGB

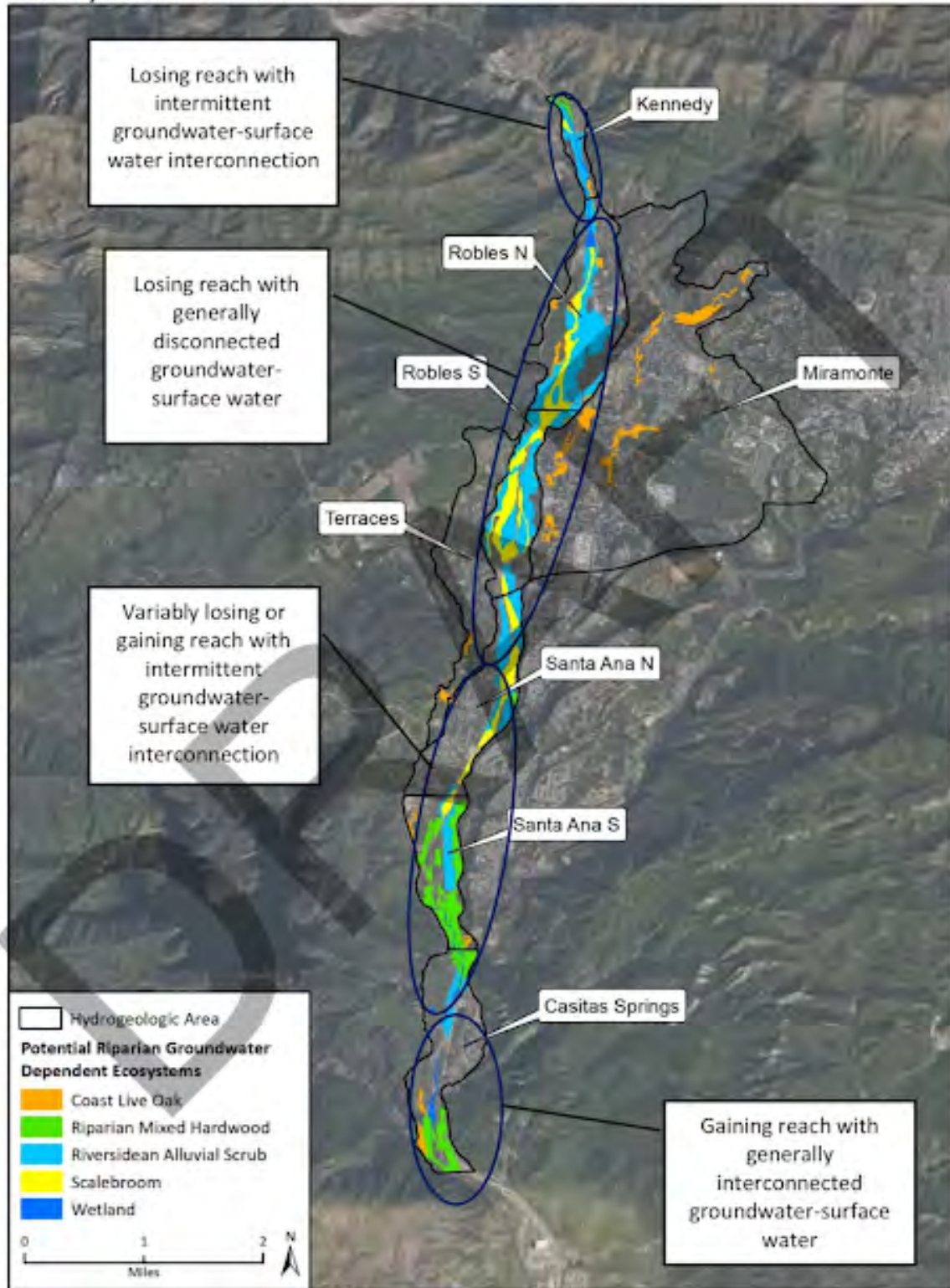


Figure 2 from Riparian Groundwater Dependent Ecosystems Assessment

6

The analysis presented relies heavily on the Nature Conservancy “Natural Communities (NC) Dataset,” using vegetation communities to eliminate GDE polygons from the Upper Ventura River Groundwater Basin. The NC dataset is a statewide geographic computer database that maps vegetation types in all potential GDEs throughout the State of California. The large geographic scope of this map does not accurately represent current on-the-ground conditions, and more robust ground truthing should be undertaken. Even the aerial photos presented tell a different story than is acknowledged in the narrative (i.e. Figure 6 North Robles Habitat Area Photographs, Aquatic GDE Characterization report)



Photograph 2. Southern portion of North Robles Habitat Area (facing south)

Figure 6 North Robles Habitat Area Photographs

7

Unfortunately, the UVRGSA analysis does not fully implement the **Best Practices for using the NC Dataset** guidance provided by the Nature Conservancy, which presents six best practices for using local groundwater data to confirm whether mapped features in the NC dataset are supported by groundwater. ([Best Practices for using the NC Dataset, TNC July 2019](#))

According to this guidance:

While depth-to-groundwater levels within 30 feet of the land surface are generally accepted as being a proxy for confirming that polygons in the NC dataset are supported by groundwater, it is highly advised that fluctuations in the groundwater regime be characterized to understand the seasonal and interannual groundwater variability in GDEs. (see Best Practice #2.)

7

one of the key factors to consider when mapping GDEs is to contour depth-to-groundwater in the aquifer that is supporting the ecosystem (see Best Practice #5).

8

The GIS Spatial Analysis of Maximum Rooting Depth and Groundwater Level presented in the Riparian GDE document **does not present such contour depth-to-groundwater** mapping or account for temporal variability.

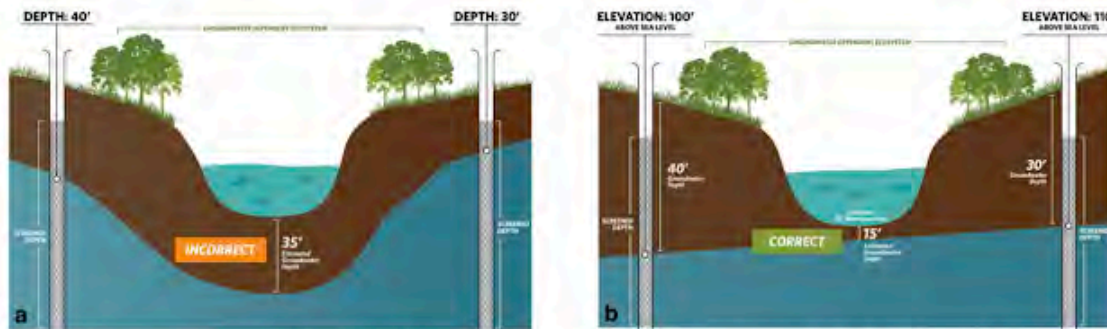


Figure 6. Contouring depth-to-groundwater around surface water features and GDEs. (a) Groundwater level interpolation using depth-to-groundwater data from monitoring wells. **(b)** Groundwater level interpolation using groundwater elevation data from monitoring wells and DEM data.

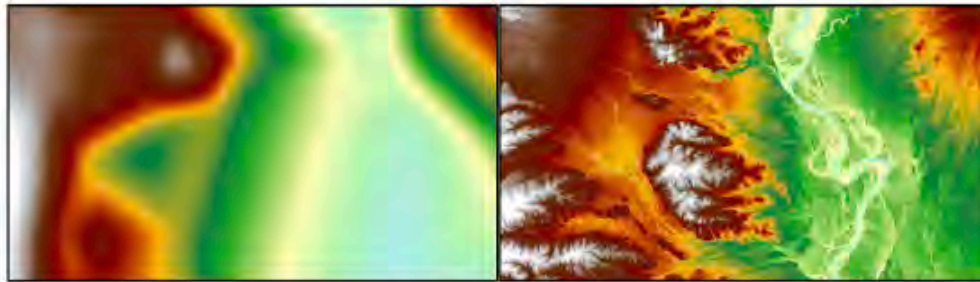


Figure 7. Depth-to-groundwater contours in Northern California. (Left) Contours were interpolated using depth-to-groundwater measurements determined at each well. **(Right)** Contours were determined by interpolating groundwater elevation measurements at each well and superimposing ground surface elevation from DEM spatial data to generate depth-to-groundwater contours. The image on the right shows a more accurate depth-to-groundwater estimate because it takes the local topography and elevation changes into account.

Figures from Best Practices for using the NC Dataset, TNC

9

Furthermore, TNC guidance acknowledges that;

*In many situations, the hydrologic connection of NC dataset polygons will not initially be clearly understood if site-specific groundwater monitoring data are not available. If sufficient data are not available in time for the 2020/2022 plan, **The Nature Conservancy strongly advises that questionable polygons from the NC dataset be included in the GSP until data gaps are reconciled in the monitoring network.** Erring on the side of caution will help minimize inadvertent impacts to GDEs as a result of groundwater use and management actions during SGMA implementation.*

Many of California's GDEs have adapted to dealing with intermittent periods of water stress, however if these groundwater conditions are prolonged, adverse impacts to

GDEs can result.

9

Therefore, it is likely that the NC vegetation mapping is representative of conditions in which groundwater levels have been frequently and repeatedly pumped beyond the reach of riparian tree roots. Meanwhile, field observations over the past few wetter years show that the riparian vegetation has rebounded, illustrating how the ecosystem responds with the variation in water years. Receding groundwater levels and corresponding loss of surface flows due to pumping during the current drought will likely reverse this recent trend, with the potential loss of the many young sycamores and other riparian vegetation.

Determining Groundwater/Surface water interactions

10

TNC guidance for determining GDEs recognizes the importance of surface flows;

*In addition, SGMA requires that significant and undesirable adverse impacts to beneficial users of surface water be avoided. **Beneficial users of surface water include environmental users such as plants or animals, which therefore must be considered when developing minimum thresholds for depletions of interconnected surface water.***

11

The **Model Results and SMC Implications Presentation (March 25, 2021)** reaches the conclusion that:

- *Basin water budget is dominated by streamflow percolation into the Basin and groundwater discharge to Ventura River*
- *GW pumping averages only ~10% of the GW Budget As low as 4% in wet years
Up to 31% in dry years*
- *Basin GW levels will be lower in dry seasons, but Basin will still re-fill in normal to wet years*

The conclusion that there is no impact from pumping based on the fact that the basin rapidly refills in the wet season points to the likelihood that the surface water is in fact “connected” to groundwater during these periods. Moreover, the fact that pumping represents up to 31% of the basin water budget in critical dry years raises the question of how these groundwater extractions impact surface flows and groundwater levels.

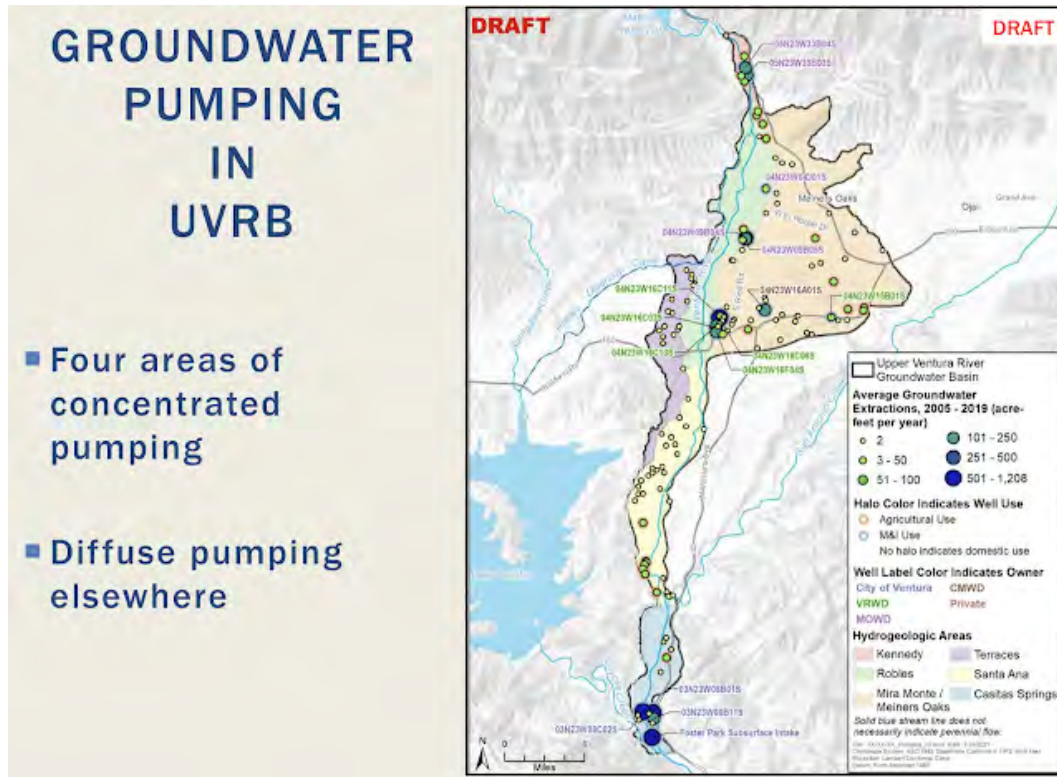


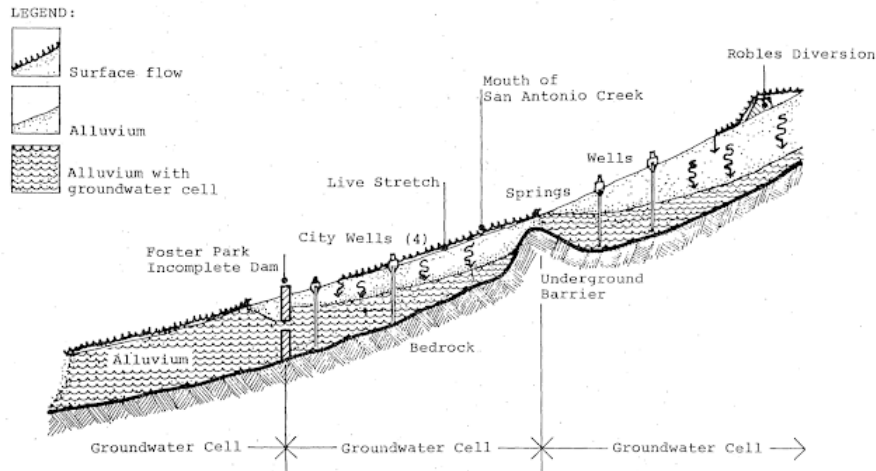
figure from [Model Results and SMC Implications Presentation \(March 25, 2021\)](#)

12

The Model Results identify four areas of concentrated pumping, three of which directly impact groundwater levels in the “Robles Reach.” This reach is the area with the most storage in the basin, and should be considered as the “primary sub-basin” for water supply. The three areas of concentrated pumping in this reach are likely to affect conditions throughout the basin.

13

The analyses and graphs presented in the Model Results do not provide information on the spacial and temporal surface flow conditions as they relate to groundwater levels. Because the downstream reaches are largely dependent on surface and groundwater flows out of this sub-basin, further analysis is needed to more clearly define the relationship between groundwater levels and surface flows. The analyses should, at a minimum, determine threshold groundwater levels at which surface flows are diminished or eliminated, both in the reach being monitored and downstream.



Ventura River at Casitas Springs

Schematic Diagram of Ventura River at Casitas Springs - Summer Condition

13

This relationship was established decades ago in the [Ventura River Conjunctive Use Report \(1978\)](#) which states that;

Flows in the live stretch are affected by both the rate of recharge of the upper part of the Ventura River groundwater basin and by the rate of groundwater extraction from wells in the river.

Investigations published in the Conjunctive Use Report identified groundwater elevation thresholds in the upper basin at which flows in the live reach will cease;

when the water level in well 4N23W16C4 falls below Elevation 495, surface flow in much of the live stretch stops although some pools remain. A flow of 1 cfs or more in the live stretch corresponds with a water level in this well of greater than about Elevation 507.

14

Groundwater levels also affect surface flows in the Robles Reach, which frequently dries up despite constant inflows. Unfortunately, the **Aquatic GDE Impact Analysis** is quick to dismiss the effect of groundwater elevation on surface flows;

No monitoring is recommended at either of the critical riffle aquatic GDEs or the Robles Habitat Area, as impacts from pumping in these areas were determined to be minimal or non-existent.

This conclusion is inconsistent with the guidance provided in [Monitoring Networks and Identification of Data Gaps BMP \(DWR 2016\)](#) which states:

23 CCR §354.34(c))(6): Depletions of Interconnected Surface Water. Monitor surface water and groundwater, where interconnected surface water conditions exist, to characterize the spatial and temporal exchanges between surface water and groundwater, and to calibrate and apply the tools and methods necessary

14

to calculate depletions of surface water caused by groundwater extractions. The monitoring network shall be able to characterize the following:

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(D) Other factors that may be necessary to identify adverse impacts on beneficial uses of the surface water.

DWR guidance provides detailed information on developing a monitoring network to accurately assess these concerns.

Establishing Minimum Flow Thresholds

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As described above, the current GSP analysis incorrectly concludes that groundwater pumping has little to no effect on surface flows throughout the majority of the basin. But even for the identified groundwater dependent “Habitat Areas,” the development of minimum flow thresholds is inadequate. For example;

For the Foster Park Habitat Area, while the City’s low-flow thresholds are based on only one HSI score evaluated in the Padre study (average thalweg depth), we understand this currently provides the best available information to establish minimum thresholds for the depletion of interconnected surface water sustainability criteria.

This statement ignores best available science, including the recently published CDFW Draft Instream Flow Recommendations (2021) as well as the NMFS Draft Biological Opinion for Foster Park Wellfield (2005).

Implications for the UVR Groundwater Sustainability Plan

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- *does not relate different minimum thresholds for different portions of the basin to conditions that could cause undesirable results*
- *does not sufficiently discuss expected impacts and therefore “precludes meaningful disclosure to, and participation by, interested parties and residents in the Basin.*

It is clear from these recent DWR determinations that much more work is needed to develop and present a clear understanding of the workings of the Upper Ventura River Groundwater Basin, the potential impacts from groundwater pumping, and a plan to better manage the limited resource to ensure future sustainability and a healthy ecosystem.

17

Recommendation:

The primary storage within the Upper Ventura River Groundwater Basin lies beneath the floodplain of the Robles reach of the Ventura River. Further analysis is needed to develop a meaningful assessment of the impact of groundwater pumping on surface flows in the Ventura River. This should include contour mapping as described in the TNC Guidance documents as well as a plan to install monitoring wells to better characterize the depth to groundwater and connectivity throughout the basin, especially through the Robles reach where the majority of pumping takes place. It is clear that this will be necessary to successfully develop the Groundwater Sustainability Plan to a level that satisfies the objectives of the Sustainable Groundwater Management Act (SGMA) in order to gain the support of local stakeholders and approval by the California Department of Water Resources.

Bryan Bondy

From: Upper Ventura River Groundwater Agency <sward@uvrgroundwater.org>
Sent: Saturday, September 4, 2021 6:15 PM
To: Summer Ward
Subject: GSP Comment/Question
Categories: Red Category

GSP Comment/Question Form

Last Name: Johnson

Edward Johnson Comments (9-4-2021)

First Name: Edward

Email Address: [REDACTED]

Confirm Email Address: [REDACTED]

Phone: [REDACTED]

Mailing Address: [REDACTED]

GSP Section for Comment/Question: 1.0 Introduction

18

GSP Comment/Question: What are the short and long-term mitigation measures that will be applied, if any, to de minimus use(<2 Acre-Foot/Year) domestic well owners if/when a maximum or minimum impact standard is reached in the relevant aquifer zone(Santa Ana, Miramonte/Meiners Oaks, Casitas Springs, etc)

Would you like to join the UVRGA Official Interested Parties List?: Yes

Beneficial Uses:

Bryan Bondy

From: Jennifer Tribo <jtribo@cityofventura.ca.gov>
Sent: Friday, October 8, 2021 3:44 PM
To: Bryan Bondy
Cc: Susan Rungren
Subject: RE: -EXT- RE: City of Ventura Comments on Draft Upper Ventura River GSP

Bryan – We have reviewed the latest draft of the GSP and do not have any additional comments, but I did want to follow-up on our comments from July.

- 2-1 Agency Information – Decided to leave as is. It is accurate.
- 2.2.2.2 Existing Water Resources Management Programs – I checked the updated documents and the numbers you used for modeling. Updating the UWMP Reference to 2020 will not change anything and is more accurate. Updating the WSECP reference to 2020 will not change any numbers. However, I do suggest leaving the 2020 CWRR reference. That is the only document that still has the single year drought extraction of 1,573 AF. The 2021 CWRR uses 1,298 AF for all drought years. I know you cannot change the modeling now (and I don't think you need to), so just leave the 2020 CWRR reference. In future updates, we will have better information on our actual extractions under the settlement protocols.
- The only other comment I was going to make was to explain the limitations how our settlement agreement protocols are modeled, but I think the sentence at the top of p130 and footnote 9 are sufficient. However, if you get comments that suggest others may need more clarification/explanation, please let me know.

Overall, great job. Thanks for your hard work on this.

Jennifer

From: Bryan Bondy <bbondy@uvrgroundwater.org>
Sent: Thursday, July 22, 2021 7:03 PM
To: Jennifer Tribo <jtribo@cityofventura.ca.gov>
Cc: Susan Rungren <srungren@cityofventura.ca.gov>
Subject: -EXT- RE: City of Ventura Comments on Draft Upper Ventura River GSP

Thanks again Jenny. Regarding the third comment – do you know if changing the references as suggested would affect any of the numbers we included in the GSP or used for modeling?

From: Jennifer Tribo <jtribo@cityofventura.ca.gov>
Sent: Thursday, July 22, 2021 12:09 PM
To: Bryan Bondy <bbondy@uvrgroundwater.org>

Cc: Susan Rungren <srungren@cityofventura.ca.gov>

Subject: City of Ventura Comments on Draft Upper Ventura River GSP

Bryan – We have given the Draft GSP a preliminary review, and have the following comments:

Please note that we will be giving the Draft GSP a more thorough review during the public comment period and may have additional edits, but we do not expect these edits to be consequential to the conclusions of the GSP. Overall, we thought it was a well written comprehensive document and appreciate your hard work on its development.

- Executive Summary – *“Ventura River Watershed Adjudication (titled Santa Barbara Channelkeeper v. State Water Resources Control Board and the City of San Buenaventura (Los Angeles County Superior Court, Case No. 19STCP01176)”*
 - We agree with this text. Good summary of a dynamic process.
- 2-1 Agency Information –
 - Will submit suggested edits to City description during the public review process.
- 2.2.2.2 Existing Water Resource Management Programs –
 - Suggest updating References to City documents – The 2021 CWRR, 2020 UWMP, and 2020 Water Shortage Event Contingency Plan have all been completed and were approved by City Council in May/June 2021.
- 3.3.1.1 Historical Demands, Supplies, and Reliability of Surface Water Deliveries – Municipal and Industrial Groundwater Supplies –
 - Suggest the following edit on Page 76
 - Municipal and Industrial (M&I) Groundwater Supplies: VRWD, CMWD, and MOWD pump groundwater within the basin to meet M&I demands. Groundwater pumping for the water districts were compiled based on reported data (details on pumping estimates for UVRGB are in Appendix F). A fraction (based on the proportion of their respective service areas inside UVRGB) of VRWD and MOWD total groundwater extractions were estimated to be used for demands within the basin. All of CMWD’s groundwater pumping was assumed to meet local demands (within the UVRGB). ~~Note that the City of Ventura pumps groundwater from the UVRGB but exports all this water to meet demands outside the UVRGB. for use within the Ventura River watershed, but outside the boundaries of the Upper Ventura River groundwater basin.~~ Hence, City of Ventura pumping was not included as part of UVRGB groundwater supplies to meet demands within the Basin. Historically, it is estimated that 19% of total M&I pumping is used to meet demands within the basin.
- 4.9.1 Undesirable Results
 - Proposed edit to Foster Park Habitat Area section on page 128 (third full paragraph):
 - The bottom chart of Figure 4.9-03 shows both total depletions (black line) and the direct depletions associated with the City of Ventura’s Foster Park extraction facilities (cyan line) that are simulated to cause stream flow to be depleted below 2 cfs. The difference between black and cyan lines is the indirect depletion associated with pumping wells located upstream of Foster Park. When interpreting the results in Table 4.9-02 and Figure 4.9-03, it is important to recall that the model simulations assume decreased annual pumping from City of Ventura’s Foster Park extraction facilities during dry years, with no pumping during August – January (Table 4.9-03). The City of Ventura Foster Park pumping schedule employed in the model simulation is intended to approximate, but not exactly replicate, the Foster Park Flow Protocols⁹. ~~Simulated City of Ventura depletions would have likely been larger if historical Foster Park extraction patterns had been used in the simulation.~~

CAUTION: This email originated from outside the City of Ventura. Exercise caution when opening attachments or clicking links, especially from unknown senders.



Generally, groundwater flow is from a northern to southern direction, following the surface drainage and the slight but relatively consistent gradient of the basin (SWRCB, 1956; VRWC, 2015) (Figure ES-08). Groundwater levels in the UVRGB fluctuate seasonally with the highest water levels occurring in the winter to early spring and the lowest levels occurring in fall or winter (Figure ES-09). Groundwater levels do not display significant long-term temporal trends. Water level declines are seen during the droughts of the late 1980s and the 2010s (when historical lows were observed); however, the water levels rebound rapidly in the wet years that follow with complete basin refilling. The changes in groundwater storage from rapid cyclical draining and filling of most of the total basin storage is in stark contrast with most Basins in the State, in which the range of storage change is small compared to the total basin storage and storage changes are more gradual over time.

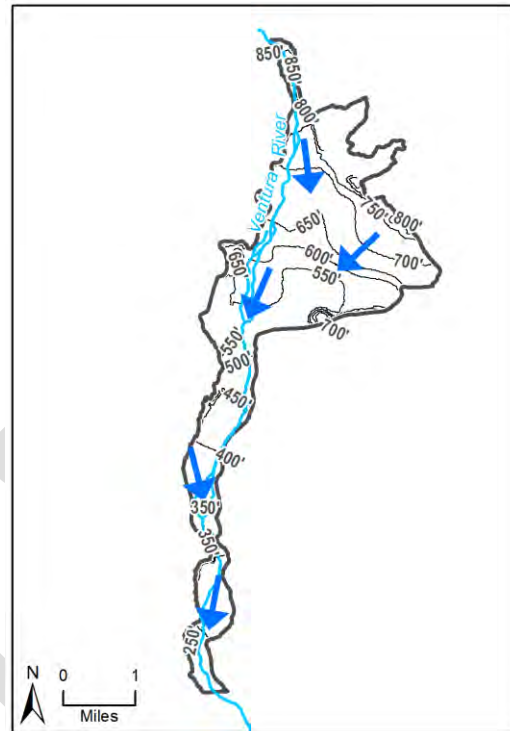


Figure ES-08: Groundwater Elevation Contours and Flow Directions

21

In general, due to the unconfined conditions of the groundwater, the quality of the groundwater in the UVRGB is heavily influenced by (a) the quality and quantity of surface water runoff that recharges the groundwater basin, (b) leaching of nutrients from fertilizers and manure, and (c) percolation of return flows from applied waters and septic system leachate. Nitrate is the primary groundwater quality concern in the UVRGB with some municipal wells exceeding the nitrate Maximum Contaminant Level in the Mira Monte area. Nitrate concentrations in groundwater within the gaining portions of the Ventura River (Casitas Springs Area and southern portion of the Santa Ana Area) are generally lower than the RWQCB Basin Plan water quality objective of 5 mg/L for surface water.

Possibly from Monterey formation as well?

Vent. Co. Environmental Health was testing nitrates to determine the source. Do they have results?

22

ES-5 Water Budget

The groundwater flow model was used to quantify water budgets for the historical, current, and projected conditions, including the evaluation of uncertainty due to climate change (Appendix H). As required by SGMA, potential effects of land use change and population growth were evaluated for the projected water budget. It was concluded that these factors are not anticipated to have a material impact on future water demand and the water budgets for the Basin because of land use policies and ordinances that greatly limit the potential for material growth in the Basin.

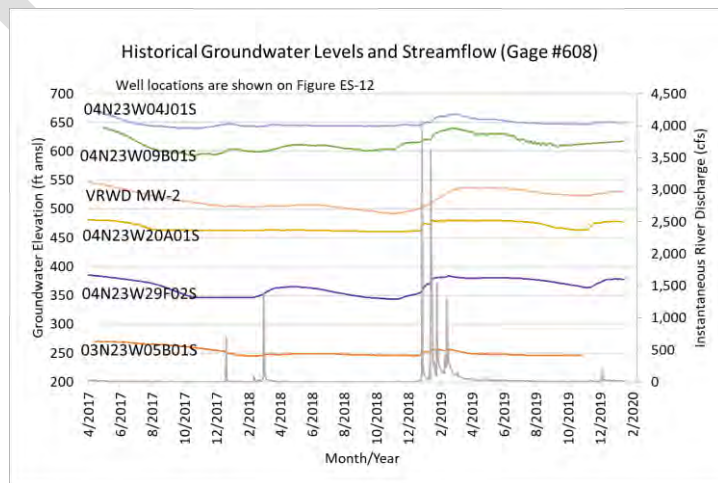


Figure ES-09: Groundwater Level Seasonal Fluctuations



SCM for ISW depletions were developed for the Foster Park Aquatic Habitat Area based on a 2012 field study that is considered to be the best available science for the Foster Park Aquatic Habitat Area (Hopkins 2013). This study established the potential for significant and unreasonable effects on steelhead when surface water flows decline below 2 cubic feet per second, as measured at Casitas Vistas Road Bridge (i.e., the southern basin boundary and location of USGS Stream Site 11118500). The minimum threshold is designed to prevent depletions of ISW that cause a degradation in habitat conditions that may be reasonably expected to lead to substantially stress steelhead and/or potential steelhead mortality (i.e., significant and unreasonable effects). The minimum threshold is ISW depletion that causes stream flow to decline to 2 or less cfs at Casitas Vistas Road bridge (USGS Stream Site 11118500, as shown in Table ES-04 below). The measurable objective is the same as the minimum threshold to minimize impacts on water supply for other beneficial users in the Basin.

Table ES-04: Minimum Thresholds and Measurable Objectives for ISW Depletion, Foster Park Habitat Area

Undepleted Flow (without groundwater pumping – derived from groundwater model)	Depletion Minimum Threshold and Measurable Objective	Goal
> 2 cfs	Undepleted flow minus 2 cfs	The minimum threshold and measurable objective seek to prevent depletions of surface water flow caused by groundwater pumping that would cause surface water flow to be less than 2 cfs when surface water flow would not be less than 2 cfs without pumping
< = 2 cfs	0 cfs	The minimum threshold and measurable objective seek to prevent depletions of surface water flow caused by groundwater pumping when surface water would already be 2 cfs or less without groundwater pumping

Significant and unreasonable effects on recreational beneficial uses are considered to be prevented if significant and unreasonable effects on GDEs are prevented because the presence of GDEs is a major reason for the recreational use of trails, preserves, etc. in the Basin.

ES-7 Monitoring Networks

The GSP Emergency Regulations require monitoring networks be developed to collect data of sufficient quality, frequency, and spatial distribution to characterize groundwater and related surface water conditions in the Basin, evaluate changing conditions that occur during implementation of the GSP, and for implementation of the SMC for the Basin. Monitoring networks should accomplish the following (§354.34(b)):

- **Demonstrate progress toward achieving measurable objectives described in the GSP**
- **Monitor impacts to the beneficial uses and users of groundwater**
- **Monitor changes in groundwater conditions relative to measurable objectives and minimum thresholds**
- **Quantify annual changes in water budget components**



Biological monitoring in the Foster Park Aquatic Habitat Area will be performed to assess performance of the ISW depletions sustainable management criteria. A work plan will be developed during fiscal year 2022 to layout the proposed monitoring activities. It is anticipated that the work plan will include a greater degree of monitoring activities leading up to the first five-year GSP evaluation to establish baseline information, followed by a more limited and streamlined monitoring program for the remainder of the GSP implementation period. The initial four-year “baseline” program may include field monitoring activities (e.g., field observations of instream habitat and aquatic species) and continuous in-situ water quality monitoring. It is anticipated that collected data will be correlated with flow measurements made by USGS and the City of Ventura. The study plan will detail a specific schedule, monitoring parameters, field methods, and data interpretation/evaluation methodology. UVRGA will develop the monitoring plan in coordination with the Ventura Watershed Adjudication parties to seek consistent potential monitoring activities that may be envisioned post-judgment. This monitoring may eventually be performed by others as part of implementation of a judgment to the adjudication. A report will be prepared at the conclusion of the baseline monitoring phase to inform the first five-year GSP evaluation.

Pursuant to section §352.6, monitoring data will be stored in UVRGA’s Data Management System (DMS). Data will be transmitted to DWR with the GSP, annual reports, and GSP updates electronically on the forms provided by DWR.

ES-8 Projects and Management Actions

Seawater intrusion and land subsidence are not applicable sustainability indicators for the Basin. Therefore, projects or management actions are not needed to address these sustainability indicators.

Historical data and the modeling projections indicate that the measurable objectives for the chronic lowering of groundwater levels, reduction of groundwater storage, and degraded water quality sustainability indicators will be met without the need for projects or management actions. However, there is uncertainty concerning effects on domestic wells in the Basin. Therefore, a management action is included to collect more information about domestic wells. UVRGA will perform additional outreach to and survey domestic well owners in the Basin. The survey will be designed to collect information from the well owners about well status (active, backup, abandoned, destroyed), water uses (drinking water, fire protection, landscape, agricultural, etc.), historical well performance, groundwater levels, groundwater quality, well maintenance issues, and whether alternative sources of water are available. This information will be used to further evaluate potential effects on domestic wells relative to the groundwater level minimum thresholds. The first 5-year GSP evaluation will consider this information and the groundwater level minimum thresholds will be updated, if appropriate.

Projects and/or management actions are needed to meet the measurable objective for depletions of interconnected surface water. Two separate actions are needed to address direct and indirect depletions that could potentially cause undesirable results.

Direct ISW depletion by City of Ventura water extraction facilities in the Foster Park Aquatic Habitat Area will be addressed via the “Foster Park Protocols.” The Foster Park Protocols consist of operational protocols for the City of Ventura extraction facilities in the Foster Park Aquatic Habitat Area that will address direct depletion of ISW. The Foster Park Protocols involve monitoring river gages and shutting down the City’s extraction facilities when certain surface water flow thresholds are reached. The Foster Park Protocols are implemented pursuant to a settlement agreement between the City of Ventura and Santa Barbara Channelkeeper regarding the action titled Santa Barbara Channelkeeper v. State Water



Definitions of Key SGMA Terms

California Water Code

Sec. 10721

Unless the context otherwise requires, the following definitions govern the construction of this part:

- " BLD OR UNDERLINE ALL WORDS "*
- (a) Adjudication action means an action filed in the superior or federal district court to determine the rights to extract groundwater from a basin or store water within a basin, including, but not limited to, actions to quiet title respecting rights to extract or store groundwater or an action brought to impose a physical solution on a basin.
- (b) Basin means a groundwater basin or subbasin identified and defined in Bulletin 118 or as modified pursuant to Chapter 3 (commencing with Section 10722).
- (c) Bulletin 118 means the department's report entitled California's Groundwater: Bulletin 118 updated in 2003, as it may be subsequently updated or revised in accordance with Section 12924.
- (d) Coordination agreement means a legal agreement adopted between two or more groundwater sustainability agencies that provides the basis for coordinating multiple agencies or groundwater sustainability plans within a basin pursuant to this part.
- (e) De minimis extractor means a person who extracts, for domestic purposes, two acrefeet or less per year.
- (f) Governing body means the legislative body of a groundwater sustainability agency.
- (g) Groundwater means water beneath the surface of the earth within the zone below the water table in which the soil is completely saturated with water, but does not include water that flows in known and definite channels.
- (h) Groundwater extraction facility means a device or method for extracting groundwater from within a basin.
- (i) Groundwater recharge or recharge means the augmentation of groundwater, by natural or artificial means.
- (j) Groundwater sustainability agency means one or more local agencies that implement the provisions of this part. For purposes of imposing fees pursuant to Chapter 8 (commencing with Section 10730) or taking action to enforce a groundwater sustainability plan, groundwater sustainability agency also means each local agency comprising the groundwater sustainability agency if the plan authorizes separate agency action.
- (k) Groundwater sustainability plan or plan means a plan of a groundwater sustainability agency proposed or adopted pursuant to this part.
- (l) Groundwater sustainability program means a coordinated and ongoing activity undertaken to benefit a basin, pursuant to a groundwater sustainability plan.
- (m) In-lieu use means the use of surface water by persons that could otherwise extract groundwater in order to leave groundwater in the basin.
- (n) Local agency means a local public agency that has water supply, water management, or land use responsibilities within a groundwater basin.



5,700

~~7,150~~

Ventura River Water District (VRWD)

VRWD is a small water district that supplies water to the area stretching from the southwestern edge of the City of Ojai down to the northern half of Oak View, and in the eastern half of Casitas Springs. VRWD serves a population of approximately 6,000 via approximately 2,150 service connections. Groundwater is VRWD's primary water supply source. VRWD also purchases surface water from CMWD, both as a backup source and as a regular source for customers in certain portions of the VRWD service area. VRWD was established in 1957 as a special district under State law, which gives authorization to exercise water supply and water management authority within its jurisdiction.

2.2 Description of Plan Area [§354.8]

This section provides a description of the plan area, including a summary of jurisdictional areas and existing water-resources monitoring and management programs in the Basin.

2.2.1 Summary of Jurisdictional Areas and Other Features [§354.8(a)(1),(a)(2),(a)(3),(a)(4),(a)(5), and (b)]

§354.8 Description of Plan Area. Each Plan shall include a description of the geographic areas covered, including the following information:

- (a) One or more maps of the basin that depict the following, as applicable:
 - (1) The area covered by the Plan, delineating areas managed by the Agency as an exclusive Agency and any areas for which the Agency is not an exclusive Agency, and the name and location of any adjacent basins.
 - (2) Adjudicated areas, other Agencies within the basin, and areas covered by an Alternative.
 - (3) Jurisdictional boundaries of federal or state land (including the identity of the agency with jurisdiction over that land), tribal land, cities, counties, agencies with water management responsibilities, and areas covered by relevant general plans.
 - (4) Existing land use designations and the identification of water use sector and water source type.
 - (5) The density of wells per square mile, by dasymetric or similar mapping techniques, showing the general distribution of agricultural, industrial, and domestic water supply wells in the basin, including minimis extractors, and the location and extent of communities dependent upon groundwater, utilizing data provided by the Department, as specified in Section 353.2, or the best available information.
- (b) A written description of the Plan area, including a summary of the jurisdictional areas and other features depicted on the map.

The geographic area covered by this GSP and managed by UVRGA includes the entire UVRGB (Department of Water Resources Basin 4-3.01) as defined by DWR Bulletin No. 118, "California's Groundwater," Update 2020 (DWR, 2020). The extent of UVRGB is shown on Figure 2.1-01. The Basin is located in the central portion of the Ventura River Watershed along the Ventura River near the communities of Casitas Springs, Mira Monte, and Meiners Oaks. The UVRGB is bordered by the Ojai and Lower Ventura River Groundwater Basins to the east and south, respectively (DWR Basin Nos. 4-002 and 4-003.02). No groundwater basins exist immediately west and north of UVRGB. The Ojai Basin is managed by the Ojai Basin Groundwater Management Agency (OBGMA). OBGMA is developing a GSP for the Ojai Basin. The Lower Ventura River Basin is a very low priority basin and is therefore not subject SGMA requirements.

Jurisdictional boundaries of various agencies located within UVRGA are depicted on Figure 2.1-02 and include:



Ventura River Watershed Adjudication (titled Santa Barbara Channelkeeper v. State Water Resources Control Board and the City of San Buenaventura (Los Angeles County Superior Court, Case No. 19STCP01176))

In 2014, Santa Barbara Channelkeeper filed a lawsuit against the City of Ventura and the State of California related to the balance between human and non-human use of the Watershed (Appendix D). Specifically, Channelkeeper asserted that the City's use of water from the Foster Park area (located within the UVRGB) violated the Reasonable Use Doctrine because the City's municipal use was harming the Southern California Steelhead. Ultimately, the Court of Appeal held that the reasonableness of the City's use had to be measured against all other users of the Watershed, and therefore allowed the City to bring into the lawsuit everyone currently extracting or who could extract water from the system in the future (cross-complaint).

In 2019, the City of Ventura entered into a settlement agreement with Santa Barbara Channelkeeper that includes certain flow and non-flow measures. The settlement agreement was executed in September 2019 and amended in August 2020. The flow measures are known as the "Foster Park Protocols" and involve monitoring river gages and shutting down the City's extraction facilities when certain surface water flow thresholds are reached. The Foster Park Protocols are relevant to this GSP because they contribute to addressing one of the six SGMA sustainability indicators: depletions of interconnected surface water. The Foster Park Protocols address direct depletion of the Ventura River by the City of Ventura's Foster Park water extraction facilities.

In 2020, certain adjudication parties developed a proposed physical solution to settle the cross-complaint. The proposed physical solution seeks to address the habitat conditions for the Steelhead population in order to return the habitat to good condition, and then maintain it. The Foster Park Protocols are a component of the proposed physical solution. The proposed physical solution has not yet been considered by the Court.

A future judgment will likely include aspects relevant to implementation of the GSP. There is no definitive timeline for a judgment. UVRGA will monitor, and to the extent possible, coordinate with the adjudication process during GSP implementation. Note that UVRGA is not a party to the lawsuit.

2.2.2.3 Conjunctive Use Programs [§354.8(e)]

§354.8 Description of Plan Area. *Each Plan shall include a description of the geographic areas covered, including the following information:*

(e) A description of conjunctive use programs in the basin.

Conjunctive use is a term used to describe the coordinated use of both surface water and groundwater resources. There are no formal conjunctive use programs in the Basin, although it is noted that MOWD and VRWD ~~and~~ operate their wells conjunctively with Lake Casitas surface water supplies. MOWD and VRWD rely principally on groundwater from UVRGB and increasingly utilize surface water from CMWD during dry periods when well yields decline. Variable groundwater pumping rates for MOWD and VRWD were incorporated into the water budgets for this GSP.



Groundwater is MOWD's primary water supply source. Water from CMWD is used as backup, such as during extended drought periods. MOWD was formed in 1948 as a special district under State law, which authorizes it to exercise water supply and water management authority within its jurisdiction. MOWD is a signatory member to the JPA Agreement forming the Agency and is represented on the Agency's Board of Directors.

- Ventura River Water District (VRWD) is a small water district that supplies water to the area stretching from the southwestern edge of the City of Ojai down to the northern half of Oak View, and in the eastern half of Casitas Springs. VRWD serves a population of approximately 6,000 via approximately 2,150 service connections. Groundwater is VRWD's primary water supply source. CMWD water is also used, both as a backup source and as a regular source for customers in some locations. VRWD is a signatory member to the JPA Agreement forming the Agency and is represented on the Agency's Board of Directors.

7,500 →



- Ventura Water (City of San Buenaventura) does not operate a public water system within the Basin boundary but operates wells in the southern portion of the Basin that supply its public water system in the City, which is located approximately 4 miles south of the Basin. The City of San Buenaventura is a signatory member to the JPA Agreement forming the Agency and is represented on the Agency's Board of Directors.

WHAT
POPULATION
SERVED

- **Local Land Use Planning Agencies:**

- The County of Ventura has land use planning authority on unincorporated land overlying the Basin (Figure 2.2-01). The County is a signatory member to the UVRGA JPA Agreement and is represented on the Agency's Board of Directors.
- The City of Ojai has land use planning authority over a small area (0.75 square miles) in the eastern corner the Basin (Figure 2.2-01). Implementation of the City of Ojai General Plan is expected to have a negligible effect on GSP implementation in the UVRGB because of the limited area within the Basin and because the overlap area and is not considered a primary groundwater recharge area due to the presence of shallow bedrock of the Sespe Formation or Ojai Conglomerate (Figure 3.1-25).
- The City of San Buenaventura has land use planning authority in a small area (0.13 square miles) of land owned by the City in the southern part of the Basin (Figure 2.2-01). The City is a signatory member to the UVRGA JPA Agreement and is represented on the Agency's Board of Directors.

- **Environmental Users of Groundwater:** Riparian and aquatic habitats in the Basin also rely on groundwater and are referred to as groundwater dependent ecosystems (GDEs) in SGMA.

Two riparian GDE units were identified in the Basin: (1) South Santa Ana GDE Unit and (2) Foster Park GDE Unit. The riparian GDE units consist primarily of mixed hardwood and wetland habitats that are federally designated critical habitat for multiple species and support a number of other special status species.

Five Aquatic GDE areas were identified in areas of the Basin, although only two were determined to be susceptible to potential significant and unreasonable effect related to depletion of interconnected surface water by groundwater extractions. These two areas are the (1) Confluence Aquatic Habitat Area and (2) Foster Park Aquatic Habitat Area. The Confluence Habitat Area occurs in the southern portion of the Basin near the confluence of the Ventura River with San Antonio Creek. This habitat area is characterized by upwelling groundwater and



surface water are intimately interconnected in the Basin. The groundwater budget and flow conditions in the alluvial aquifer are dominated by interaction with the Ventura River, which provides most of the recharge (inflows) to the Basin as stream flow percolation in the northern portion of the Basin and receives most of the discharge (outflows) from the Basin as down valley groundwater flow that feeds springs (i.e., groundwater discharge) in the Ventura River in the southern portion of the Basin (hence, the name of the community of Casitas Springs). Groundwater extractions are secondary to groundwater discharge to the Ventura River except during dry periods when the spring flows decrease substantially due to low Ventura River stream flow entering the northern end of the Basin.

The thinness of the aquifer, high permeability, large north-south topographic gradient, and intimate interconnection between groundwater and surface water causes UVRGB to behave materially different than most groundwater basins in the State. The Basin groundwater levels and storage trends closely mimic surface water flows, with groundwater levels and storage exhibiting large and rapid fluctuations relative to the total saturated thickness and total groundwater storage, more so than perhaps any other groundwater basin in the State. During non-drought periods, the Basin fills up on the order of two out of every three years and significant surface water base flow is sustained by rising groundwater in the southern part of the Basin. During droughts, much of the Basin groundwater storage drains out naturally to the Ventura River within the first few years causing a significant decrease in Ventura River base flow in the lower part of the Basin.

To facilitate discussion within the GSP, the Basin has been subdivided into six hydrogeologic areas based on the hydrogeology, stratigraphy, and primary recharge and discharge processes (Figure 3.1-01 and discussed in detail in Sections 3.1.1 and 3.1.3). For ease of discussion, the text will refer to these areas in the following sections. Four of the hydrogeologic areas— the Kennedy, Robles, Santa Ana and Casitas Springs Areas – run north to south along the Ventura River corridor and were delineated primarily based on groundwater-surface water interaction characteristics. The Mira Monte/Meiners Oaks Area located east of the Ventura River underlain by older alluvium that generally above the water table; many wells in this area are believed to extract groundwater from bedrock formations such as the Ojai Conglomerate that do not have significant hydraulic connectivity with the Ventura River. The groundwater-bearing formations in the Mira Monte/Meiners Oaks Area have much lower permeability compared to the younger deposits along the Ventura River. The Terraces Area west of the Ventura River consists of alluvial deposits that are elevated above and separated from the Ventura River floodplain by bedrock; therefore, groundwater in the Terraces Area has very limited hydraulic connection with the rest of the Basin.

3.1.1 Regional Hydrology

3.1.1.1 Precipitation, Topography and Watershed Boundary [§354.14(d)(1)]

§354.14 Hydrogeological Conceptual Model.

- (d) Physical characteristics of the basin shall be represented on one or more maps that depict the following:*
- (1) Topographic information derived from the U.S. Geological Survey or another reliable source.*

The UVRGB is located within the Ventura River Watershed and lies under and adjacent to the northern part of the Ventura River. The Ventura River Watershed encompasses about 227 miles in northwest Ventura County with a small portion of the watershed in the southeastern edge of Santa Barbara County (Figure 3.1-02). The Ventura River runs through the center of the watershed, draining numerous



water storage capacity to less than 500 AF (USBR, 2000; Entrix, 2001). The removal of the dam was authorized in 1998, but removal is still pending.

Casitas Reservoir is the largest reservoir within the watershed. The Casitas Dam was constructed in 1959 by the United States Bureau of Reclamation (USBR), providing a maximum storage capacity of ~~254,000~~ AF (Entrix, 2001) with a long-term average demand of 17,500 AF (VRWC, 2015). Water is diverted from the Ventura River via the Robles Diversion and delivered to the reservoir through the Robles Diversion Canal, a concrete-lined 5.4-mile canal (EDAW, 1978). The diversion works consist of a cutoff wall, forebay basin, spillway, fish passage structures, and diversion canal to Casitas Reservoir (CMWD, 2005). Typically, a little less than half of the reservoir supply comes from the Ventura River. Runoff from Coyote and Santa Ana sub-watersheds provides the remainder of its supply (Entrix, 2001). Diversions from Ventura River to Casitas Reservoir are typically from January to March when the river flows are sufficient to meet certain operational regulatory requirements designed to address upstream steelhead migration impediments between the diversion works and just north of the Santa Ana Boulevard bridge. The diversion system has a nominal capacity of 500 cfs (CMWD, 2021). Environmental considerations and physical operating conditions govern operation of the diversion structure under different hydrologic situations. The Biological Opinion (BO) from the National Marine Fisheries Service (adopted in 2004) modified previous requirements for passage of flows for fish habitat. This was further modified during the recent drought to allow increased diversions to the Lake when storage levels in the Lake are low (CMWD, 2021). Within the Migration Period (Jan. 1st to June 30th) outlined in the BO, available flows above 30 cfs up to 500 cfs can be diverted down the Robles Canal, with flows at or below 30 cfs, bypassing the diversion structure and flowing downstream. Additional diversion rules are applied to maintain flows during and after stormflow events within the fish migration season. Outside of the migration period (July 1 to December 31), available flows over 20 cfs up to 500 cfs can be diverted down the Robles Canal.

In addition to the Robles Diversion, there is a privately owned surface water diversion located north of the Robles Diversion (Figure 3.1-08) used for agricultural purposes.

Water from the Lake Casitas Reservoir is the primary water supply for many users in the Basin. Lake Casitas' water is also blended with poorer quality groundwater to improve water quality and extend supplies (VRWC, 2015). The reservoir is carefully managed to maintain supplies during a dry period equivalent to the historical 21-year dry period from 1945 to 1965, the longest dry period on record. While the lake has not yet been put to a "21-year dry period test," it has been a reliable source of water in many multi-year dry periods when numerous wells were dry and there was little flow in the Ventura River (VRWC, 2015).

The Foster Park Subsurface Dam, completed in 1908 by the Ventura County Light and Power Company, is a partial dam extending 973 ft across the Ventura River at a depth ranging between 5 ft to 65 ft with a 300-ft gap on the east side (URS, 2003; USACE, 2004). This partial dam is located just upstream of the boundary between the Upper and Lower Ventura River Groundwater basins. The City of Ventura formerly captured surface flows via a surface diversion. However, this facility has been closed since 2000, due to natural channeling of the Ventura River that has bypassed the structure (Entrix, 2001; VRWC, 2015). The City of Ventura currently extracts water via a subsurface collector consisting of two perforated pipes installed in the subsurface on the upstream side of the dam and several nearby wells (i.e., the "Nye Wells").

3.1.1.3 Imported Water [§354.14(d)(6)]



of the basin (e.g., published geologic maps such as Dibblee, 1987, 1988; and the USGS Earthquake Hazards Program (USGS, 2020). Faulting can offset bedrock and older (deeper) alluvium deposits, potentially form subsurface barriers to water flow, and force groundwater to daylight to ground surface and discharge into surface water channels.

Within this regional setting, the UVRGB extends from just downstream of the confluence of the Matilija Creek and the North Fork Matilija Creek (Ventura River Mile 16.2) to Foster Park (Ventura River Mile 5.9). In the north and west, the UVRGB is bounded by tertiary bedrock outcrops (Figure 3.1-10a). The boundary between the UVRGB and adjacent Ojai Basin is approximately situated between Camp Comfort to the south and Arbolada to the north. South of the Ojai Basin boundary, the UVRGB is bounded by the Arroyo Parida-Santa Ana Fault and bedrock outcrops. The UVRGB is bounded by the Lower Ventura River Groundwater Basin to the south.

Figures 3.1-10a and 3.1-10b show the surface geology and major fault systems within and surrounding the UVRGB (USGS, 2006, 2015). The UVRGB is filled with Quaternary-aged alluvium of largely fluvial origin, with sediment derived from the weathering and erosion of the surrounding mountains. These deposits consist of older late Pleistocene-aged, dissected sediments and younger Holocene-aged sediments. Active sedimentation occurs as stream-channel deposits of sand and gravel, such as along Ventura River and its tributary creeks; alluvial fan deposits of gravel; and floodplain alluvium of clay, silt, sand, and gravel (e.g., Dibblee, 1987, 1988).

The UVRGB extends as a north-south trending narrow and shallow erosional trough, filled with young alluvium deposited by the Ventura River between Camino Cielo Road in the north and the United States Geological Survey (USGS) gauging station at Casitas Vista Bridge in the south. The young alluvial deposits are highly permeable (hydraulic conductivity as high as approximately 3,500 feet per day) and have relatively high storage coefficients (specific yield as high as approximately 14%). North of approximately Highway 150, the young alluvial deposits are typically underlain by older alluvium that has significantly lower permeability and water storage capabilities. South of approximately Highway 150 the Ventura River ~~may~~ has eroded completely through the older alluvium deposits and the young alluvial deposits are in direct contact with the bedrock (as evidenced from the bedrock outcrops along the edges of the river floodplain).

The eastern portion of the UVRGB extends east from the Ventura River encompassing the communities of Meiners Oaks and Mira Monte and is underlain by older alluvium deposits that are generally above the water table and various bedrock formations which have limited hydraulic connectivity with the Ventura River. Many wells in the Mira Monte – Meiners Oaks Area may be screened in the Ojai Conglomerate, a bedrock formation that has low permeability and water storage capability (for example, the hydraulic conductivity at the new VRWD Well No. 6 was estimated to be ~3 ft/day compared to hydraulic conductivity along the Ventura River of >1,000 ft/day). The “Terrace” areas west of the Ventura River is also underlain by older alluvium that is uplifted above the regional water table and, hence, is largely hydraulically disconnected from the principal aquifer of the Basin. Wells in the Terrace Area appear to generally draw water from the underlying Sespe Formation.

The relatively young (Holocene- to late Pleistocene-aged) surficial sediments unconformably overlie older Pleistocene- and Tertiary-aged consolidated sedimentary rocks (discussed in more detail in Section 3.1.3.1 and shown on cross-sections in Figures 3.1-16 through 3.1-18). The older bedrock units consist of sedimentary rocks of dominantly marine deposition, which are exposed to ground surface in the mountainous regions that surround the basins (e.g., Dibblee, 1987; USGS, 2006, 2015).