



202 W. El Roblar Dr.  
Ojai, CA 93023  
(805) 640-1247  
<https://uvrgroundwater.org/>

March 25, 2021

Ed Pert, Regional Manager  
California Department of Fish and Wildlife  
South Coast Region  
3883 Ruffin Road  
San Diego, CA 92123

Via E-mail to [InstreamFlow@wildlife.ca.gov](mailto:InstreamFlow@wildlife.ca.gov)

RE: Comments on Draft Instream Flow Regime Recommendations for the Lower Ventura River,  
Ventura County

Dear Mr. Pert,

Thank you for the opportunity to submit comments on the above referenced document (Draft Flow Recommendations). The five public agencies that comprise the UVRGA (Casitas Municipal Water District, City of San Buenaventura, County of Ventura, Meiners Oaks Water District, and Ventura River Water District) reserve the right to submit separate, standalone comments.

UVRGA's mission is to address the requirements of the Sustainable Groundwater Management Act (SGMA), which is a three-bill legislative package signed into law in late 2014, composed of AB 1739 (Dickinson), SB 1168 (Pavley), and SB 1319 (Pavley). SGMA established a statewide framework for groundwater management at the local level. SGMA requires the formation of Groundwater Sustainability Agencies (GSAs) to manage groundwater basins sustainably by developing and implementing groundwater sustainability plans (GSPs). UVRGA is the GSA for the Upper Ventura River Basin (UVRB), which covers the Ventura River and its floodplain from just downstream of Matilija Dam to Foster Park, encompassing the northern 2/3 of Reach No. 3 and the entirety of Reach 4 designated in the Draft Flow Recommendations.

SGMA requires that UVRGA manage the groundwater resources of the UVRB in a manner that avoids undesirable results<sup>1</sup> by 2042 for six sustainability indicators, including significant and unreasonable depletion of interconnected surface water caused by groundwater pumping. UVRGA's management of this sustainability indicator will play a key role in addressing environmental beneficial uses of surface water in Reach Nos. 3 and 4, particularly during dry periods when streamflow is highly dependent on groundwater discharge to the Ventura River.

---

<sup>1</sup> Undesirable results occur when significant and unreasonable effects for any of the sustainability indicators are caused by groundwater conditions occurring throughout the basin. (GSP Emergency Regulations §354.26)

## Comments:

### 1. Habitat Considerations:

As discussed on page nos. 1-2 of the Draft Flow Recommendations, flow is not the only factor affecting steelhead in the Ventura River watershed. The document sites multiple factors and emphasizes habitat degradation. The loss of high-quality freshwater habitat is cited as “one of the leading causes of salmonid decline in California (CDFG 2004).” The Flow Recommendations notes that access to over half of the historically available spawning and rearing habitat in the Ventura River watershed is blocked by the Matilija Dam and Casitas Dam and the remaining spawning and rearing habitat below these dams has been degraded. The document goes on to say that “maintaining suitable instream flows that protect basic ecosystem functions can help maintain freshwater habitat for migration, spawning, incubation, and juvenile rearing of salmonids” (emphasis added), again recognizing that flow is not the only factor impacting steelhead populations.

UVRGA agrees that habitat is a critically important factor for addressing the long-term protection, maintenance, and continued viability of stream-related fish and wildlife resources. However, UVRGA is concerned that the Draft Flow Recommendations focus exclusively on streamflow and do not consider habitat improvement opportunities and how habitat improvement could affect the flow regime necessary to protect steelhead. As you may know, an extensive suite of habitat improvement projects is proposed for the watershed, including ongoing efforts to remove Matilija Dam. Habitat improvement should be considered in the analysis and a holistic approach to the flow recommendations should be developed that incorporates and emphasizes habitat considerations.

### 2. Streamflow Interannual Variability Considerations:

The Ventura River exhibits a wide range of interannual variability in streamflow, as demonstrated in Figure 4 of the Flow Recommendations. However, the Draft Flow Recommendations ignore interannual variability by recommending a single set of flow recommendations to be applied to “all water year types.” Comparison of the Flow Recommendations with Appendix A of CDFW’s *Instream Flow Regime Criteria on a Watershed Scale, Ventura River* (dated March 2020) reveals that the proposed flow recommendations for Reach 3 will only be met during “wet” conditions. Certainly, steelhead are adapted to the interannual variability in streamflow, otherwise the species probably would not have existed in this watershed to begin with. Interannual streamflow variability should be considered and addressed in the Draft Flow Recommendations.

3. Uncertainty Analysis:

The Draft Flow Recommendations are based on limited data from the Ventura River, appear to rely heavily on models developed in other regions, and appear to rely on certain inputs and/or assumptions derived from other rivers. It seems likely that these factors contribute to a significant uncertainty in the actual flows necessary to sustain steelhead. The Draft Flow Recommendations should discuss these uncertainties, both qualitatively and quantitatively. The document should include a discussion of the applicability of the methods developed elsewhere to the Ventura River and a discussion of how various assumptions or model inputs could affect the recommended flows and to what magnitude.

4. Monitoring and Adaptive Management:

The Draft Flow Recommendations should include recommendations for monitoring to address uncertainty in the flow regime recommendations, to understand the impact of habitat improvement projects, and to develop data to understand steelhead responses to interannual streamflow variability. The Draft Flow Recommendations should include a proposed adaptive management framework that would be used to revisit flow objectives over time based on the monitoring results, perhaps at five-year intervals in parallel with UVRGA's required GSP updates.

Thank you again for the opportunity to submit comments on the Draft Flow Recommendations. As a public agency in the watershed, we look forward to working toward a sustainable future that balances the needs of all water users. Please contact me if you have any questions concerning UVRGA's comments. I can be reached via phone at 805-212-0484 or via e-mail at [bbondy@uvrgroundwater.org](mailto:bbondy@uvrgroundwater.org).

Sincerely,



Bryan Bondy, PG, CHG  
Executive Director