

## Bryan Bondy

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**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

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**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?

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

Cc: Susan Rungren <[srungren@cityofventura.ca.gov](mailto: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 Protocols<sup>9</sup>. ~~Simulated City of Ventura depletions would have likely been larger if historical Foster Park extraction patterns had been used in the simulation.~~

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