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October 8, 2021

Upper Ventura River Groundwater Agency
Attn: Mr. Bryan Bondy
202 W. El Roblar Dr.
Ojai, CA 93023

Subject: Public Comment Draft Upper Ventura River Valley Basin Groundwater Sustainability Plan

Dear Mr. Bondy:

Ventura County Public Works Agency, Watershed Protection (VCPWA-WP), appreciates the opportunity to review the Upper Ventura River Basin Groundwater Agency (UVRBGA) *Public Comment Draft Upper Ventura River Valley Basin Groundwater Sustainability Plant* (Draft) dated August 2021. Following are our comments:

On 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.).

On 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).

On page ES-xiv, the well on which the groundwater levels in the hydrograph shown in Fig. ES-11 should be identified.

On 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.

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).

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.

In 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.

In 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.

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.

In 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.

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.

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.

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.

On 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.

On 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.

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.

On 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"?

On page 79, second paragraph, clarify if stream outflows from individual streams make up 83% of the total groundwater model domain inflows.

On 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.

On pages 87-88, per Table 3.3-03, are M&I demands appropriately estimated, given the likelihood of multiple-dry year conditions?

On 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?

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?

On 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.

On page 115, second Paragraph, "…and UVRGA determines that exceedances are caused by groundwater pumping." The criteria for making this determination should be identified.

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.

On page 132, top paragraph, consider using groundwater levels for measuring this SCM (in addition to flows). Measurement may be implied with the addition of new wells, but it is not sufficiently described in this section.

On 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 be needing to be identified in this area.

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.

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.

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.

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).

If you should have any questions, please contact James Maxwell at james.maxwell@ventura.org or (805) 654-5164, or me at kim.loeb@ventura.org or (805) 650-4083.

Sincerely,

Kimball R. Loeb, PG, CEG, CHG
Manager, Groundwater Resources Section
Water Resources Division

C: Jeff Pratt, Director, Ventura County Public Works
Glenn Shephard, Director, Ventura County Public Works, Watershed Protection
Arne Anselm, Deputy Director, Ventura County Public Works, Water Resources

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