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March 31, 2024  
Project No: 20-10008

Attn: Bryan Bondy, Executive Director and GSP Manager  
Upper Ventura River Groundwater Agency  
202 West El Roblar Drive  
Ojai, California 93023  
Via Email: [bbondy@uvrgroundwater.org](mailto:bbondy@uvrgroundwater.org)

**Subject: Proposed Amendments to the Confluence Aquatic Habitat Area Aquatic Groundwater Dependent Ecosystem Monitoring Workplan**

Dear Mr. Bondy:

Per our discussion, this letter documents proposed amendments to the Confluence Aquatic Habitat Area Aquatic Groundwater Dependent Ecosystem Monitoring Workplan (Workplan). Following guidance provided in Sections 4.9.1 and 5.8 of the Groundwater Sustainability Plan (GSP), Upper Ventura River Groundwater Agency (UVRGA) adopted the Workplan on August 11, 2022 to determine if interconnected surface water (ISW) depletion is causing significant and unreasonable effects on the Confluence Aquatic Habitat Area Groundwater Dependent Ecosystem (GDE). The monitoring program was designed to provide data that can inform whether sustainable management criteria (SMC) for the *Depletion of Interconnected Surface Water* sustainability indicator are warranted for the Confluence Aquatic Habitat Area. The Workplan's monitoring elements were specifically crafted to assess conditions during periods of low surface water flow during which significant and unreasonable effects to the Aquatic GDE could potentially occur.

As a result of two wet rainy seasons through Water Year 2024 and 2025, elevated flows exist in the Confluence Aquatic Habitat Area, and throughout the Ventura River. The Workplan established anticipated schedules for snorkel and habitat surveys and continuous water quality and flow data collection. While the purpose of the Workplan was to assess habitat suitability conditions at lower flows, it did not specify flow ranges or targets to trigger monitoring activities. In light of the elevated flow conditions and the need for more specificity, this amendment clarifies the monitoring schedule and establishes flow- and condition-based triggers for monitoring components. The proposed modifications are as follows:

- Continue to conduct one snorkel and habitat survey in the winter, timing dependent upon safe flow conditions for river access.
- Continue to conduct at least one snorkel and habitat survey in the summer/fall.
- Do not conduct additional summer/fall snorkel and habitat surveys if flows do not recede below 12.7 cubic feet per second (cfs) at Casitas Vista Road Bridge (location of the USGS Stream Site 11118500) unless visual inspection of the Confluence Aquatic Habitat Area suggest monitoring is warranted.<sup>1</sup>

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<sup>1</sup> This flow threshold is based on the current measurable objective included in the GSP for the Foster Park Aquatic Habitat Area GDE



Upper Ventura River Groundwater Agency  
**Request for Amendment to Confluence Aquatic Habitat Area Aquatic  
Groundwater Dependent Ecosystem Monitoring Workplan**

- Deploy continuous data loggers and conduct stream gaging activities once receding baseflow conditions allow for safe access to the river, flow is confined to a primary/main channel, and instantaneous discharge measurements can be safely collected.
  - This will require discretion based on professional judgement, and appropriate conditions are anticipated to occur around 40 - 50 cfs, measured at Casitas Vista Road Bridge.

We appreciate our continued working relationship with UVRGA and look forward to continuing work on this important program. Please do not hesitate to contact us if you have questions about this request.

Sincerely,

**Rincon Consultants, Inc.**

A handwritten signature in black ink, appearing to read "K. Brtalik", written in a cursive style.

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Director, Watershed Sciences

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