


**COUNTY OF VENTURA
PUBLIC WORKS AGENCY
MEMORANDUM**

DATE: April 2, 2021

TO: Glenn Shephard, Director, Watershed Protection 

FROM: Pam Lindsey, Watershed Ecologist

VIA: Sergio Vargas, Deputy Director

SUBJECT: Review of *Assessment of Groundwater Dependent Ecosystems for the Fillmore and Piru Basins Groundwater Sustainability Plan*, Draft Technical Memorandum dated February 2021

The Ventura County Public Works Agency Watershed Planning and Permits Division reviewed the above document prepared by Stillwater Sciences. The following comments are provided.

CEQA:

- 1) No actions considered to be a project under CEQA are proposed at this time, therefore no comments are provided pursuant to Ventura County Initial Study Guidelines 31a or 17b.

Flow and Gage Information:

- 1) Page 2 states flows on Piru Creek have been regulated except for the 1969 flood. In 2005 the dam also spilled (12,000 cfs?) and so there may be other instances of this. UWCD staff should check the records to verify this statement.
- 2) Page 4, reference to USGS gauge 11114000 seems to indicate it is still active. The USGS has not maintained or published the data for this gauge for some time. Currently this is done by Watershed Protection for their gauge 723 and we have operated the gauges at locations 720 and 724 as well.

Vegetation Descriptions:

- 1) The inconsistent use of plant community nomenclature throughout the document, as well as the lack of clear community descriptions, invalidates the conclusions regarding ecological value and dependence on groundwater.
- 2) Incorrect usage/spelling of common and scientific names occurs throughout the text.
- 3) For special-status species, we suggest emphasizing that SWFL and WYBC require more extensive and contiguous riparian woodlands, compared to LBVI which can make use of smaller scrub patches.

Analyses and Conclusions:

- 1) We agree that more shallow wells are needed to discern the true level and extent of groundwater in the GDEs. Incomplete data sets lead to many assumptions in the analyses.
- 2) We agree with the conclusion that the Del Valle, Cienega, and East Grove Riparian Complexes are the most important GDE units to consider in the GSP analyses. We recommend more study and data collection to determine how the Santa Clara River Riparian Shrubland GDE units are affected by groundwater and if its management would affect them. The Shrublands form substantial cover within the river and provide habitat connectivity among the Riparian Complexes.

Projects and Management Actions:

- 1) In this section, please clarify why the FPBGSA has not determined projects and/or management actions are needed. Do the conclusions in this and other reports indicate the GDEs are adequately sustained and current groundwater extractions are not affecting them? Or has the FPBGSA not yet developed management actions due to a need for more information or time?

References:

- 1) The Stillwater Sciences 2013 reference page 11 is not included in the list of literature cited.

END OF TEXT