

October 2, 2021

Comments on the Draft Groundwater Sustainability Plan (GSP) for the Fillmore Basin submitted to Eva Ibarra at evai@unitedwater.org:

My husband and I farm a 20-acre parcel located in the Fillmore Basin. As a landowner and member of the Fillmore-Piru Basin Pumpers Association, I have been closely following the development of the GSP and participating in stakeholder meetings. The Draft GSP is an impressive document which will form the basis for managing the Basin sustainably going forward, a goal I support and endorse. Given that the Draft GSP is open for public comment until October 9, I am writing today to convey my concerns and suggest changes to improve the Draft GSP for the Fillmore Basin.

My concerns can be categorized as follows:

1. General comment: the GSP seems too succinct in describing the process the GSA and stakeholders went through to develop the Plan. Because the Plan doesn't adequately reflect the great effort behind the Plan, it may result in an avoidable DWR review. DWR should be informed of how much we struggled with key issues for countless hours and how much the GSA engaged with stakeholders to resolve those issues. Otherwise they may conclude that the Plan is simply a "box-checking" exercise and initiate an unnecessary review.
2. Technical accuracy with regard to Sustainable Yield. The approach that the consultants took significantly underestimates the true resiliency and potential of the Fillmore Basin. As indicated by early model runs, this basin can refill with more pumping. I would therefore encourage the consultants to use those model runs where there was a lot more pumping and the Basin still recovered as the basis for our Sustainable Yield. The point should be clearly articulated that our Sustainable Yield is actually much higher than the one the consultants used, which is based on historical water budget.
3. Aquifer designations: It seems unnecessary to break out the deep aquifer C from the other combined category of Aquifers A & B. We are not using the deep aquifer C significantly (only between 1% and 4% of our supply) but breaking it out as a separate principal aquifer will add costs and monitoring effort for an insignificant source. I would suggest combining it with the A & B aquifer category.
4. Use of the term "Data Gap": As I understand it the regulatory definition of "data gap" is a lack of data that significantly impairs our ability to manage the aquifer sustainably. It appears that the consultants in a number of places in the GSP used the term data gap inappropriately when they lacked information or had limited data about something that does not impact our ability to sustainably manage the basin. For example in Section 2-41 lines 2-6, the text reads:

“Data gaps exist for the hydraulic gradients between the Main and Deep principal aquifers throughout the Basin that would help refine the HCM; however, these data gaps are not considered significant enough to prevent this Plan from demonstrating that the Basin can be managed sustainably, especially because relatively little groundwater is used from the Deep Aquifer.”

If the lack of information on the hydraulic gradients is not considered significant enough to prevent the Basin from being managed sustainably, then that lack of information is not, by definition, a “data gap” and therefore, should not be referred as such.

It seems to me other instances of the improper use of “data gap” occurred as follows: Section 2-59 starting at Line 20, Section 2-38 starting at Line 3, Section 3-16 starting at Line 7, Section 2-37 starting at Line 24, Section 3-15 starting at Line 9, Section 2-56 starting at Line 16, Section 3-29 starting at Line 17. I would ask the consultants to carefully review their use of “data gap” at these places in the GSP to be sure they are referring to true “data gaps” and not simply to areas where they lack information that is not critical to sustainable management (i.e. “nice to know” but not essential to sustainability).

I submit these comments in the spirit of improving an already extensively researched and well written report. I hope they may prove helpful to the consultants as they prepare the final GSP for submission to DWR.

Sincerely,

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