



Anthony Emmert - Executive Director
Fillmore and Piru Groundwater Basins
Groundwater Sustainability Agency
P.O. Box 110
Fillmore, CA 93106

Re: California Trout Inc. Comments on DRAFT - Fillmore Basin Groundwater Sustainable Management Plan

Within the Fillmore-Piru Groundwater Sustainable Management Agency's (FPGSA) jurisdictional area, there is federally designated critical habitat for the endangered Southern California Steelhead (Southern steelhead) in the mainstem Santa Clara River (SCR), Sespe Creek, and other smaller tributaries. Southern steelhead serve as an indicator of total watershed health and integrity. To maintain the landscape level ecosystem function and service on which we all depend, is imperative that we conserve and restore these habitats and the processes that are needed to maintain them. Sustainable groundwater use is directly related and inseparable from the status of Southern steelhead.

The Santa Clara River, while maintaining more natural character in comparison to other river systems in Southern California, has seen significant loss of habitat for Southern steelhead and other native species. This has been through extensive modification, simplification and degradation of aquatic habitats including groundwater dependent ecosystems (GDEs) and depletion of instreams flows due to over utilization through groundwater extractions and surface diversions. Depletion of groundwater has been shown to shrink or degrade available habitat for all development stages of southern steelhead by reducing baseflows, increasing surface water types, reducing habitat complexity, and impacting native riparian vegetation and wetland habitats (Barlow and Leake 2012, Glasser et al. 2007, Hayes et al. 2008).

The value of habitat remaining in this basin was central to National Marine Fisheries Service's (NMFS) Southern Steelhead Recovery Plan (NMFS 2012) assessment that the SCR should be prioritized for recovery actions. FPGSA's management area contains multiple listed riparian and aquatic species, and is central to the long-term success of Ventura and Oxnard communities. The Sustainable Groundwater Management Act (SGMA) clearly specifies the requirement to identify and consider significant and unreasonable adverse impacts to GDEs and for all recognized beneficial uses and users of groundwater including aquatic ecosystems and species dependent on interconnected waters.

Unfortunately, this plan does not accomplish that task. It is California Trout Inc.'s (CalTrout) judgement that this plan does not sufficiently characterize the relationship between groundwater and GDEs or interconnected surface waters within their jurisdictional area. It has been repeatedly shown that groundwater management decisions in the SCR basin within the FPGSA management area have impacts on surface flow conditions and GDEs (Stillwater Sciences 2007a, 2007b).

The draft GSP's shows near complete disregard for core SGMA requirements to ensure no adverse impacts to beneficial uses or users of groundwater in the GSA when they determined that the SCR Riparian Shrubland GDE has "*low vulnerability to groundwater reduction*" and simply serves as an upstream migration corridor during high flows. This assessment takes the narrowest vantage point possible in determining how Southern steelhead utilize different habitat types to make long-term groundwater management decisions. It also appears to be justified by incomplete or little to no data at all, a fact acknowledged by the GSP. Without robust data to support this decision, the FPGSP cannot ensure that there are not adverse impacts as a result of their future pumping allocations to this GDE.



California Trout Inc.
360 Pine St.
San Francisco CA 94014

The plan is particularly deficient when it comes to the relationship between groundwater quantity and the seasonality of instream flow conditions and interconnected surface waters. These habitats and biotic conditions play a critical role in southern steelhead migration to and from major tributaries that have confluences within the GSA. Sespe Creek is vital to the long-term survival of several listed species. This plan, while acknowledging that immediately upstream is perennial, then decides that connection to groundwater in the GDE is “*unknown but unlikely*.” The plan offers not data to support this decision or any monitoring plans to determine if it is an accurate assumption.

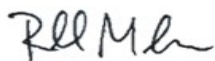
On page 2-15, the GSP identifies Environmental Stakeholder Director for this GSA as representing the interests of the Santa Clara River Environmental Groundwater Committee. It further elaborates that this committee is under the direction of CalTrout and is comprised of the Santa Clara River Steelhead Coalition (SCRSC). This is a mischaracterization of CalTrout’s role in the on-going SMGA process for this basin and of the intended purpose of the SCRSC.

The SCRSC is a California Department of Fish and Wildlife (CDFW) grant funded program to advance watershed restoration project in that Santa Clara Basin that conserve and protect southern steelhead and their required habitat. There is no named or established Santa Clara River Environmental Groundwater Committee within the SCRSC. We have discussed as a group the importance of groundwater and the relationship it has on mediating fluvial ecosystem processes, but this is not our singular focus. The SCRSC supports processed-based watershed restoration that represent community developed resource management solutions. The appointed Environmental Director of this GSA does not serve at the direction of CalTrout or the SCRSC. Edit this and any other section that implies this to better reflect the representation of environmental interests in this SGMA process.

Ultimately this plan does very little to address the adverse impact groundwater pumping has on the depletion of interconnected surface waters and GDEs. This is evident in how the plan repeatedly dismisses any relationship between groundwater pumping and GDEs or interconnected surfaces waters but routinely acknowledges that limited data was used to draw these conclusions. For the SGMA requirements of sustainability to be met, the GSA must provide sufficient data describing the relationship between interconnected surface waters and GDEs to current and future groundwater pumping levels. This data should specifically address shallow aquifer conditions for the entire GSA planning area in the same manner and intensity that the principal aquifer is analyzed. It is only with this data collected and analyzed can we determine what sustainability indicators describe these relationships and how anticipated undesirable results will be mitigated or managed to meet the sustainability criteria set out by SGMA.

CalTrout looks forward to reviewing the revised draft GSP that addresses these significant issues presently identified.

For the record,



Russell Marlow
CalTrout - Senior Project Manager
21 S. California St Ste. 305
Ventura CA 93001

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