

October 8, 2021

Fillmore and Piru Basins Groundwater Sustainability Agency
c/o United Water Conservation District
Attn: Ms. Eva Ibarra
1701 N. Lombard St., Suite 200
Oxnard, CA 93030

Subject: Fillmore Basin Groundwater Sustainability Plan Public Review Draft

Dear Ms. Ibarra:

Ventura County Public Works Agency, Watershed Protection (VCPWA-WP) appreciates the opportunity to review the Fillmore and Piru Basins Groundwater Sustainability Agency (FPBGSA) *Fillmore Basin Groundwater Sustainability Plan Public Review Draft* (Draft) dated August 6, 2021. Following are our comments.

On page ES-1, it is recommended that the sustainability criteria be renamed to match the terminology used in the regulations:

1. Chronic Lowering of Groundwater Levels
2. Reduction of Groundwater Storage
3. Seawater Intrusion
4. Degraded Water Quality
5. Land Subsidence
6. Depletions of Interconnected Surface Water.

On page ES-1, the rationale for exclusion of the sustainable management criteria (SMC) for Interconnected Surface Water because it is “not applicable due to significant effect of droughts that deplete rising groundwater areas” should be explained in more detail. There is interconnected surface water as well as groundwater dependent ecosystems (GDEs) supported by rising groundwater, all of which are influenced by the hydrology, including groundwater pumping. This comment applies to all portions of the Draft where interconnected surface water and GDEs are discussed and the SMC is excluded, particularly in Section 3 (SMC).



There are references to the groundwater model in Appendix E throughout the text body. It would be helpful to include a summary discussion on the model in the GSP text rather than requiring the reader to review the detailed modeling appendix.

On page 2-8, section 2.1.3, lines 11-16, there should be a description of the assumptions/estimate of demand changes or reasons for why demand changes that are not going to occur.

Section 2.2.1.4 lists the two principal aquifers in the Subbasin (unconfined Main Aquifer and the semi-confined Deep Aquifer). There are subsequent references to Aquifer Zones A, B and C per United (2021a). Discussion of the relationship between the principal aquifers and the Aquifer Zones is not introduced until Section 3.5.4.2. It would be helpful to the reader to introduce this relationship in Section 2.2.1.4 and when discussing Aquifer Zones in other parts of the text. Further, it would be helpful to include the relative depths (and thickness) of these aquifers and the aquitard separating them found in Section 2.2.1.4.2 to better support Section 2.2.1.3.

Section 2.2.2.5.2 reports that elevated nitrate concentrations in the Fillmore area may be related to agricultural practices. Septic and wastewater treatment systems may also contribute to the higher concentrations of nitrates.

On pages 2-46 and 2-56, a summary table of constituents of concern (COCs) would be helpful by showing the maximum and minimum regulatory COC thresholds.

A legend should be provided on Figure 2.2–19 clarifying what the different color dots represent.

The water budget graphic is incorrectly identified as Figure 2.2-30 in the text. It should be identified as Figure 2.2-33.

It would be informative to list surface water diversions for the tributaries of the Santa Clara River within the Subbasin and estimated annual quantity of diverted water for each (Section 2.2.2.7). Is this represented as the “Unaccounted Flows” value in Table 2.2-11?

On page 2-72, lines 3-6, the apparent reduction in average pumping demand during the current drought is inferred, as metered pumping data are not available. The lower recent pumping could be an artifact of the water budget calculations and not supported by evidence (pumping data and/or groundwater levels).

On page 3-1, lines 22–25, were disadvantaged communities (DACs) and private well owners actively involved in the stakeholder process? It would be beneficial to add this information to the text.

On page 3-6, lines 22 – 24, it is unclear if the representative monitoring sites are included in the network at this time. Summary tables in the text would be helpful.



On page 3-11, section 3.3.5, the text should provide the rationale for establishment of the subsidence MT by the FPBGSA Board of Directors.

It could be beneficial to include a project in Section 4 to survey existing wells within the Subbasin for well status and annual extractions.

On page 4-3, the narrative should be revised to indicate the difference between Projects 2 and 3 for shallow monitoring wells. Where are the wells in Project 3 likely to be needed?

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
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Water Resources Division

C: Jeff Pratt, Director, Ventura County Public Works
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