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October 22, 2021

Fillmore & Piru Basins Groundwater Sustainability Agency  
P O Box 1110  
Fillmore, CA 93016

**Subject: Comments on the draft Groundwater Sustainability Plan for Piru basin**

Dear Fillmore & Piru Basins Groundwater Sustainability Agency:

The following are comments prepared by United Water Conservation District's (United) technical staff regarding the August 2021 draft Groundwater Sustainability Plan (GSP) for Piru basin:

**Section 1.0: Introduction**

The Piru basin GSP is well organized and well written. The purpose and sustainability goals of the Piru basin GSP are clearly defined, and the background agency information presented is consistent with United's understanding.

**Section 2.0: Plan Area and Basin Setting**

United appreciated the opportunity to contribute to the Piru basin GSP through the development of the recent updates for the hydrogeologic conceptual model and the numerical surface water and groundwater flow modeling that were referenced and used throughout much of Section 2. The GSP hydrogeologic conceptual model identifies and describes aquifer zones A, B, and C within the basins that are based on varying aquifer properties and depths of occurrence following United's presentation of a similar convention within the referenced modeling reports. We believe that the GSP adequately describes the variability within the aquifer zones with the data currently available. For management purposes, we believe that identifying a single Principal Aquifer within both the Piru and Fillmore basins is appropriate given the limited number of wells screened only in zone C, as well as the number of wells that are screened across zones B and C in both basins. As new data become available in the future, we look forward to collaborating with the FPBGSA to continually improving our understanding of surface water and groundwater conditions, refine the hydrogeologic conceptual model for the basins if necessary, and periodically refine and update the numerical surface water and groundwater flow models, as needed.

**Section 3.0: Sustainable Management Criteria**

United believes the sustainable management criteria described in the GSP and supporting documents, including measurable objectives and minimum thresholds, are defined appropriately and are reasonable. However, we suggest that more content from Appendix J (Technical Memorandum relating to the



Sustainable Management Criteria) be included within the relevant portions of the GSP document and be referenced more clearly, especially in Section 3.4 where measurable objectives are addressed. United agrees that the current understanding of present-day and future groundwater uses in Piru basin does not suggest that significant and unreasonable impacts should be expected for the six SGMA sustainability indicators. United agrees that undesirable results related to seawater intrusion are not applicable sustainable management criteria in Piru basin as described in Section 2.2.2.4 of the draft GSP. Additionally, United agrees that the potential future depletion of interconnected surface water as presented in the Piru basin GSP in the context of temporary habitat loss is reasonable and should not be considered a significant and unreasonable effect, as supported by the explanations mentioned in Section 3.2.5 of the draft GSP.

Related to the monitoring network background, analysis, and proposed expansion, United agrees with the information provided in Section 3 of Piru basin's draft GSP and looks forward to supporting efforts to collect additional data related to the current and proposed expansion of the monitoring network for the sustainable management criteria for which sustainable management criteria have been developed.

#### **Section 4.0: Projects and Management Actions to Achieve Sustainability Goal**

United agrees with the proposed projects and management actions that support the five sustainable management criteria for which sustainable management criteria have been developed. We agree that these projects and management actions have the potential to enhance the water resources of the Piru basin and aid in keeping the basin closer to the desired future conditions. United looks forward to supporting efforts related to ongoing project planning and implementation in the near future.

#### **Section 5.0: Plan Implementation**

United is committed to supporting efforts related to ongoing project planning and implementation in the future.

If you have any questions or require additional information, please do not hesitate to contact me at 805-525-4431.

Sincerely,

Zachary Hanson, PhD  
Hydrogeologist