



May 2, 2017

Ventura County Planning Division
800 South Victoria Ave
Ventura, CA 93009

Re: Comments on Chapter 10 - General Plan Background Report: Water Resources

In general, the draft Water Resources Chapter does not properly represent Ventura County's determination to excel in water supply, treatment and environmental solutions. The background sections are supposed to be based on facts not ideology as these facts will guide the ultimate vision.

The Water Resources Chapter needs to be more balanced in its characterization of water resources and its reflection of the positive collaborative efforts by water producers and users to manage the resource in the future.

The chapter particularly expresses a consistent bias against development and agriculture even while admitting in the Natural Resources Chapter that nearly half of the County land is in National Forest and only 9 percent is classified as developed. Particularly, Section 10.1 - Major Findings needs to be more positive, appreciating the County's land conservation and stewardship of the past, considering all of the present beneficial uses of water including agriculture as important and expanding the list of potential solutions to provide water in the future.

SECTION 10.1 MAJOR FINDINGS

Recommendations:

- 1) Bullet 3 – Recommend that land area be expressed in acres rather than square miles. Throughout the various sections it switches back and forth between square miles and acres which is confusing. Most readers know what an acre of land is and water quantities are generally expressed in acre feet.
- 2) Bullet 4 – The ability to meet future demands will require more storage facilities and interconnections between pipelines to move water to areas of need as conditions change. In addition, significant water conservation efforts have been made by agricultural producers including high-efficiency drip systems that should be recognized along with municipal and industrial users.
- 3) Bullet 5 - Some groundwater basins in the County are experiencing overdraft conditions. There are only 2 basins in Ventura County that are in overdraft per DWR. The overdraft issues in Cuyama Basin are not caused in Ventura County.
- 4) Bullet 6 - Groundwater information is limited in some basins. Ventura County is far ahead of most counties in California from the perspective of metering, data collection and groundwater modeling. While there are data gaps, the FCGMA is first in a pilot project to implement automatic metering systems, supported by agricultural producers. The State DWR is looking at Ventura County to be the model for other CA Counties in the SGMA process. This should be recognized in Major Findings!
- 5) Bullet 7 - Environmental demands on water supplies will certainly change and the finding should state that more strict requirements will threaten the economic viability of agriculture and the manufacturing industry as well as add pressure to increase imported water supply.

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- 6) Bullet 9 – This bullet’s characterization of Urban land development is prejudicial and reflects past developments not necessarily future ones. Report needs to add that the impacts to water quality are required to be mitigated by the myriad of local, state and federal regulations. On new projects, alteration of stormwater runoff and discharges from sewage treatment plants, septic tanks and industrial facilities are regulated.
- 7) Bullet 10 - Agricultural land development can impact water quality – Agricultural development does not necessarily negatively impact water quality. Infiltration may improve with tillage and recharge to groundwater may be increased. The average reader would consider an “impact” as a negative, which is not necessarily the case.
- 8) Bullet 11: There are 24 beneficial uses of water in the Federal Clean Water Act. Poor water quality can be created by one beneficial use at the expense of another. People fishing and recreating may have an adverse impact on water quality that could affect municipal water supplies. The water quality major finding needs to be a balanced discussion supportive of all beneficial uses of water.
- 9) Bullet 12 - Development does not always alter land topography. Again, this is a prejudicial statement against development of manmade structures, many of which will be necessary to increase infiltration, storage, and transportation and to build new facilities to improve the supply and quality of water to our County.

SECTION 10.2 LEGAL AND REGULATORY FRAMEWORK FOR WATER MANAGEMENT

Subsection: Sustainable Groundwater Management Act (State)

Recommendation: The summary needs to include the SGMA General Provisions Section 10720.5 (b) *Nothing in this part, or in any groundwater management plan adopted pursuant to this part, determines or alters surface water rights or groundwater rights under common law or any provision of law that determines or grants surface water rights.*

SECTION 10.3 INTEGRATED REGIONAL WATER MANAGEMENT

Recommendation: The WCVL IRWM Plan includes a goal to “Reduce dependence on imported water”. Is this realistic going forward, considering the 5-year drought and the potential for excess water from the State in flood years?

SECTION 10-4 EXISTING CONDITIONS

Subsection: Ventura River Watershed / Groundwater

Recommendations:

- 1) Need to add that the OBGMA has submitted an Alternative Groundwater Sustainability Plan to DWR for consideration.
- 2) Need to add that the Upper Ventura River Groundwater Sustainability Agency was formed and a Joint Powers Agreement was signed as the first step to a Groundwater Sustainability Plan.

Subsection: Ventura River Watershed / Other Water Supplies

Recommendation: Need to add the current consideration of a connection to the State Water Project through Metropolitan MWD and Calleguas MWD to be able to take delivery of this entitlement.

Subsection: Ventura River Watershed / Water Related Challenges

Recommendations:

- 1) Need to add a paragraph on water for agriculture in the Drought Supply and Variability section.
- 2) Need to add a Water for Agricultural Purposes section as agriculture is important in this watershed and was threatened by the drought. Supply variability caused the County to pass a well moratorium urgency ordinance prohibiting new groundwater wells until Groundwater Sustainability Plans are filed in Medium or High priority basins.

Subsection: Santa Clara River Watershed / Imported Supplies

Recommendation: Need to add that there are opportunities to purchase imported water from the State Water Project in high rain / flood years as was done by United Water Conservation District in 2017.

Subsection: Santa Clara River Watershed / Available Supplies / Groundwater

Recommendation: The Fox Canyon GMA groundwater basins are mostly in the Calleguas Creek Watershed, not the Santa Clara River watershed. Table 10-10 Oxnard Subbasin groundwater budget should be moved to Calleguas Creek.

Subsection: Santa Clara River Watershed / Available Supplies / Recycled Water

Recommendation: Need to update the status of the City of Oxnard AWPf

Subsection: Santa Clara River Watershed / Water Related Challenges / Declining Groundwater Levels

Recommendation: Need to remove the statement that groundwater levels in the Santa Paula Basin have shown a long-term decline or add a reference. Levels have declined in the drought but we have seen no evidence of long term decline.

Subsection: Santa Clara River Watershed / Water Related Challenges / Coastal GW Overdraft and Seawater intrusion

Recommendation: Need to move these sections to the Calleguas Creek Watershed section

Subsection: Calleguas Creek Watershed / Groundwater

Recommendations:

- 1) Need to add the Oxnard Plain Basins to this watershed
- 2) Need to add a discussion of the Freeman Diversion and settling ponds to the recharge area of the Oxnard Plain and Pleasant Valley basins.

SECTION 10-5 TRENDS AND FUTURE CONDITIONS

Recommendations:

- 1) Need to add a summary of the Los Posas Replacement Water Study for supplemental water projects being coordinated by Calleguas MWD
- 2) Bullet Point 4 - Include information on the Calleguas countywide desalination study.
- 3) Bullet Point 6 – Add that many agricultural users have installed high-tech drip systems that monitor climate and humidity, particularly for the berry crops.

Thank you for the opportunity to submit comments and engage in the General Plan process.

Sincerely,



Lynn Gray Jensen
Executive Director