

**From:** [Anselm, Arne](#)  
**To:** [FCGMA](#)  
**Subject:** FW: Comments for GSP Periodic Evaluation  
**Date:** Monday, October 7, 2024 4:48:06 PM  
**Attachments:** [FCGMA GSP Periodic Evaluation Response Oxnard.pdf](#)

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**From:** Wolfe, Michael [REDACTED]  
**Sent:** Monday, October 7, 2024 4:36 PM  
**To:** Anselm, Arne [REDACTED]  
**Cc:** Timothy Beaman [REDACTED]  
**Subject:** Comments for GSP Periodic Evaluation

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Hello Arne,

Please see the attached letter from the City of Oxnard.

Michael

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**Michael L. Wolfe, P.E. - Director of Public Works**  
**Public Works Department**  
305 West Third Street, East Wing, Third Floor  
Oxnard, California 93030  
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## Public Works Department

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October 7, 2024

Arne Anselm, Interim Executive Officer  
Fox Canyon Groundwater Management Agency  
800 S. Victoria Ave. / #1610  
Ventura, CA 93009

Subject: Fox Canyon Groundwater Management Agency (FCGMA) First Periodic Evaluation Groundwater Sustainability Plans (GSP) for the Oxnard Subbasin and Pleasant Valley Basin

Dear Mr. Anselm,

The City of Oxnard appreciates the opportunity to submit comments on the first periodic evaluation of the groundwater sustainability plans for the Oxnard subbasin and Pleasant Valley basin. Based upon information gathered from some of the outreach meetings attended by Oxnard staff, and after reviewing the available documents, the City has the following comments for your consideration.

**1. It is not clear if the Periodic Evaluation of Groundwater Sustainability Plan (Periodic Evaluation) for the Oxnard Subbasin (Basin) complies with the California Department of Water Resources (DWR) *A Guide to Annual Reports, Periodic Evaluations, and Plan Amendments (Guidance)* with respect to the description of the progress on the Projects and Management Actions (PMAs) within the Basin:**

· *Per the Guidance: "The discussion of the projects should include evaluations and reporting on the quantified benefits of each project and anticipated benefits of the projects that broke ground or were completed during the evaluation cycle."*

· *Per the Groundwater Sustainability Plan (GSP) Regulations § 356.4 (b): "A description of the implementation of any projects or management actions, and the effect on groundwater conditions resulting from those projects or management actions."*

- We could not find specific information in the Periodic Evaluation that consistently discusses and reports the quantified benefits of each project and management actions (PMAs). Table 3-1 and Table 3-2 of the Periodic Evaluation include the "benefits observed to date", but many projects only have qualitative descriptions. For example, Section 3.1.1 discusses the new extraction allocation system that supports the implementation of the two management actions (Reduction in Groundwater Production and Water Market Pilot Program) identified in the Oxnard Plain Groundwater Sustainability Plan (GSP). However, the quantified benefits of

these PMAs are not discussed in the relevant section or Table 3-1. Please confirm the Periodic Evaluation meets the guidance provided by the DWR.

· *Per the Guidance: “A GSA should assess the projects and management actions outlined in the original GSP and explain whether those are still relevant and feasible, including estimates of cost and potential funding sources and whether permitting and CEQA requirements need to be met.”*

- We could not find specific information that the Periodic Evaluation discusses the cost and potential funding sources and whether permitting and CEQA requirements need to be met for the PMAs. Please confirm the Periodic Evaluation meets the guidance provided by the DWR.

· *Per the Guidance: “Additionally, for the various projects and management actions outlined in the GSP, the GSA should describe the process for public notice and engagement of interested parties.”*

- We could not find specific information that the Periodic Evaluation discusses the process for public notice and engagement of interested parties for each PMA. Please confirm the Periodic Evaluation meets the guidance provided by the DWR.

· *Per the Guidance: “For projects and management actions that are currently ongoing or have already been completed, the Periodic Evaluation should provide an evaluation and status update including realized benefits, expected benefits, and benefits and impacts to beneficial uses and users. The description should include how these projects and management actions are helping the basin achieve sustainability through the assessment of the groundwater conditions in relation to the measurable objectives for the relevant sustainability indicators. A description of the monitoring network and data related to projects and management actions that are showing progress toward sustainability, and documentation that the project is not impacting nearby beneficial users, should be included.”*

- Project 1 and Project 9 are ongoing. However, we could not find specific information in the Periodic Evaluation that discusses how these projects are helping the Basin achieve sustainability through the assessment of the groundwater conditions in relation to the measurable objectives for the relevant sustainability indicators. Additionally, we could not find specific information in the Periodic Evaluation that discusses the monitoring network and data related to these projects. Please confirm the Periodic Evaluation meets the guidance provided by the DWR.

· *Per the Guidance: “Significant new information should be discussed. Such as whether a GSP project was considered no longer necessary and was dropped, ....” And “The GSA should describe the challenges or setbacks that have prevented or delayed implementation of projects and management actions”*

- Project 3 Riverpark-Saticoy GRRP is inactive but the Periodic Evaluation did not discuss the reasons, challenges, or setbacks that have prevented or delayed

implementation. Please confirm the Periodic Evaluation meets the guidance provided by the DWR.

- Project 5 Voluntary Temporary Fallowing is not implemented but the Periodic Evaluation did not discuss the reasons, challenges, or setbacks that have prevented or delayed implementation. Please confirm the Periodic Evaluation meets the guidance provided by the DWR.
- In Table 3-1, one of the top management actions is reduction in groundwater extraction, which has not been implemented. The Periodic Evaluation did not discuss the reasons, challenges, or setbacks that have prevented or delayed implementation. We request that the Periodic Evaluation include more details about FCGMA's desire to pursue ramp down and the potential timeline.

· *Per the Guidance: "For projects and management actions that have yet to begin or are still conceptual, assess the need for those based on the current conditions and expected outcomes of the existing projects and management actions. Describe the potential timeline to get those projects and management actions implemented or what may be needed to take them from the conceptual or as-needed phase to the "shovel ready" phase."*

- The Periodic Evaluation lists some PMAs that are in the preliminary design phase, such as Projects 2, 11, 12, 17, and 18, but the potential timeline for these PMAs could not be specifically found. Please confirm the Periodic Evaluation meets the guidance provided by the DWR.

## **2. It is not clear if the Periodic Evaluation fully complies with the Guidance or the GSP Regulations with respect to the description of GSP effectiveness.**

· *Per the Guidance: "The GSA should evaluate current groundwater conditions for each applicable sustainability indicator relative to sustainable management criteria established in the GSP (i.e., measurable objectives, interim milestones, minimum thresholds, and undesirable results) and describe, with supporting data, whether implementation of the GSP is effective."*

· *Per the GSP Regulations § 356.4 (b): "A description of the implementation of any projects or management actions, and the effect on groundwater conditions resulting from those projects or management actions."*

- The Periodic Evaluation notes that Minimum Threshold (MT) exceedances and Undesirable Results (URs) occurred during the evaluation period. However, groundwater elevations in all key wells rebounded to be above the 2025 Interim Milestones (IMs) by spring 2024. We could not find specific information that the Periodic Evaluation clearly assesses whether the progress is due to GSP implementation or simply due to the favorable climatic conditions in 2023 and 2024. For example, a more thorough assessment of the long-term trends in Basin performance (normalized for climatic variability) would provide a clearer picture of GSP implementation effectiveness so that Basin management can be proactive to

avoid URs. Please confirm the Periodic Evaluation meets the guidance provided by the DWR.

· *Per the Guidance, for each applicable sustainability indicator, consider: “Evaluate progress made (including challenges encountered, if applicable), describe any adaptive management approaches employed to address minimum threshold exceedances, whether GSP implementation is effective thus far, and any other pertinent information related to progress towards achieving sustainability.” And “Have basin conditions and GSP implementation affected beneficial uses and users? For example, were there any reported dry wells during the evaluation cycle?”*

- URs occurred in spring 2015 and fall 2022 (Section 2.2.1.4), but the Periodic Evaluation only describes the adaptive management approaches in general terms, and the potential impact on beneficial uses and users due to MT exceedances or URs, such as any reported dry wells, is not discussed. Please confirm the Periodic Evaluation meets the guidance provided by the DWR.

· *Per the Guidance, for each applicable sustainability indicator, consider: “are other sustainability indicators being impacted”*

- We could not find specific information that the impact of each sustainability indicator on other sustainability indicators was discussed in the Periodic Evaluation. Please confirm the Periodic Evaluation meets the guidance provided by the DWR.

· *Per the Guidance on basin setting section, GSAs shall “describe whether changes to surface water supply reliability will affect water budget assumptions.”*

- Section 4.2.2 discussed water supplies during the evaluation period and compared them to historical and projected supplies in the GSP. However, we could not find specific information that the changes to surface water supply reliability and their effect on water budget assumptions were discussed. Please confirm the Periodic Evaluation meets the guidance provided by the DWR.

### **3. It is not clear if the Periodic Evaluation fully addresses all of the DWR Corrective Actions.**

· *DWR Recommended Corrective Action 4: Elaborate how the Agency is planning to verify that the groundwater level thresholds are adequate to assess the groundwater quality conditions in the Subbasin. Discuss how the groundwater quality data from the existing monitoring network will be used for sustainable management of the Subbasin. Coordinate with the appropriate groundwater users, as identified in the GSP, and the appropriate water quality agencies in the Subbasin to evaluate how the Agency’s current groundwater management strategy is affecting the groundwater quality in the Subbasin.*

- Section 2.2.4.1 of the Periodic Evaluation discusses how the GSAs verified that the groundwater levels are adequate to assess the groundwater quality conditions.

However, we could not find specific information that the Periodic Evaluation discusses “how the groundwater quality data from the existing monitoring network will be used for sustainable management of the [B]asin” and coordination with appropriate water quality agencies in the Basin. Please confirm the Periodic Evaluation meets the guidance provided by the DWR.

- The GSP stated that there are several sources of salinity in the basin, and the GMA could not determine which is actually causing any given detrimental chloride/salinity water quality impacts. The evaluation does not indicate whether the GMA has a better understanding of this key conceptual model issue. However, all of the PMAs, including EBB, seem to be based on the assumption that salinity impacts are primarily caused by modern-day seawater intrusion. We recommend that the evaluation should assess how sustainability indicators will be affected if this assumption on the source of salinity impacts is incorrect, even partially. Also, there should be an evaluation of the effect of PMAs like EBB on the other two sources of salinity. Further, the validity of the GMA's apparent assumption that modern-day seawater intrusion is the primary source of salinity in the basin may also affect the ongoing validity of the GSP's assumption that groundwater elevation is a good proxy for all other sustainability indicators.

*Per the DWR GSP Assessment Staff Report: “The GSP also states that the City of Oxnard’s General Plan does not contain water supply assumptions, which would conflict with the sustainable management criteria or the projects and management actions proposed in Oxnard GSP. However, the City of Oxnard submitted a comment to the Department claiming that the GSP’s statement is inaccurate because there are fundamental inconsistencies between the City’s 2030 General Plan and the GSP. The City further states that water demand in the City could increase by 50 percent due to population growth, so the GSP’s management action to reduce groundwater pumping by 40 percent is inconsistent with the City’s growth assumptions, long-term strategy for groundwater management, water supply assumption, and the land use plan. Department staff encourage FCGMA to work with the City of Oxnard to rectify the difference in policies that could potentially impact SGMA implementation in the Subbasin.”*

- We could not find specific information that the Periodic Evaluation addresses DWR’s comment regarding reconciling the inconsistency between the City of Oxnard’s 2030 General Plan and the GSP. If it is not included already, the City requests that as part of a GSP update (see also Comment #4), the City’s growth and water supply assumptions be accurately reflected.

#### **4. The Basin would benefit from a GSP Update.**

*Per the GSP Regulations § 354.44 (a): “Each Plan shall include a description of the projects and management actions the Agency has determined will achieve the sustainability goal for the basin, including projects and management actions to respond to changing conditions in the basin.”*

- As FCGMA is aware, the City of Oxnard is completing the construction of a pilot Aquifer Storage and Recovery (ASR) Indirect Potable Reuse (IPR) project that is

anticipated to yield as much as 2,800 acre-feet per year (AFY). Additionally, in the City's approved 5-year capital improvement program, there are several more ASR projects planned with funding identified, each with a theoretical yield of 2,800 AFY per well, for a total of 14,000 AFY. Despite prior requests, it is not clear that the IPR project has been explicitly incorporated into the GSP and the Basin groundwater flow model (Model). The City requests that as part of a future GSP update, the list of PMAs for the Basin be fully updated and reflected in both the GSP and the Model.

- For the Oxnard subbasin, Table ES-3 (page ES-4) includes a reference to significant progress on projects and programs to mitigate overdraft and seawater intrusion to include the expansion of recycled water. However, we could not find specific information to verify that the groundwater model scenarios include additional new water supply generated by implementation of both Phase I and Phase II of the City of Oxnard GREAT Program, which are expected to generate up to 14,000 AFY as noted above. Please clarify which recycled water projects are being referenced for progress towards mitigation of overdraft and seawater intrusion.
- A seawater intrusion barrier project is referenced on Table 1-1 Page 4. There is also a reference to a Seawater Injection Barrier Feasibility Study (Project 11) on Page 49. Please provide clarification on who is the lead agency for this project and please provide copies of study and the, "Preliminary groundwater modeling" referenced that "suggests that ... installation of 5 to 10 injection wells landward of the eastern edge of the existing seawater intrusion front, injecting a total of 2,400 AFY, has the potential to eliminate any further inland migration of seawater in the FCA". Please provide the model input used to generate the preliminary results.
- In order to encourage the development of PMAs in the Basin, a storage accounting framework or other mechanisms should be established to protect the investments that entities make in terms of creating new water supplies that improve Basin sustainability (e.g., developing IPR and other recharge and conjunctive use projects).
- Taken together, the extreme and unique recent climatic conditions resulting in substantially larger diversions from the Santa Clara River and significant likely reliance on EBB for seawater intrusion mitigation are complex enough to warrant a GSP update. The evaluation is reliant on the 2021 technical memoranda (United Water Conservation District 2021a). The City is aware United has been working very hard to develop more current and robust analysis, which may affect the assessment of PMAs and other critical aspects of the evaluation.

· *Per the GSP Regulations § 354.8 (f): "A plain language description of the land use elements or topic categories of applicable general plans that includes the following:*

*(2) A general description of how implementation of existing land use plans may change water demands within the basin or affect the ability of the Agency to achieve sustainable groundwater management over the planning and implementation horizon, and how the Plan addresses those potential effects.*

*(3) A general description of how implementation of the Plan may affect the water supply assumptions of relevant land use plans over the planning and implementation horizon.”*

- *Per the GSP Regulations § 354.18 (3)(B): “Projected water demand shall utilize the most recent land use, evapotranspiration, and crop coefficient information as the baseline condition for estimating future water demand. The projected water demand information shall also be applied as the baseline condition used to evaluate future scenarios of water demand uncertainty associated with projected changes in local land use planning, population growth, and climate.”*
  - Per Comment #3, above, the City requests that the City’s growth and water supply assumptions be accurately reflected in a GSP update, if not already accounted for in the Periodic Evaluation.

**5. The assessment of boundary flows and the impacts to Basin sustainability need to be further assessed.**

- *Per the Guidance: “A list of potential additional information is provided below:*
  - *Describe relevant interbasin coordination efforts.”*
  - *Discuss how the proposed management of the Basin (including minimum thresholds and measurable objectives) aligns with the management of adjacent basins.*
  - *Describe potential impacts from adjacent basins and/or to adjacent basins due to Plan implementation*
  - *Assess whether Plan implementation is affecting the ability of an adjacent basin to achieve its sustainability goal.”*
- *Per the GSP Regulations § 355.4 (b)(7): “Whether the Plan will adversely affect the ability of an adjacent basin to implement its Plan or impede achievement of its sustainability goal.”*
  - Inflows to the Basin from the adjacent Pleasant Valley Basin and the Los Posas Basin are an important component of the Basin water budget. Updated boundary flow values are included in Table 5-2 and Section 5.2.2 of the Periodic Evaluation. However, the City is concerned about how those flows may be impacted in the future and desires that a future GSP update include a discussion and additional certainty as to how these flows will be maintained in the future, as well as an assessment as to whether Sustainable Groundwater Management Act (SGMA) implementation or the adjudication in the Pleasant Valley Basin will impact the Basin’s ability to achieve sustainability.

Thank you for the opportunity to provide comments on the Periodic Evaluations. The City recommends that FCGMA conduct a GSP update for the Oxnard Subbasin and Please Valley



Basin in the near future. For specific questions regarding our comments, please contact Timothy Beaman (timothy.beaman@oxnard.org or 805.760.1837).

Sincerely,

A handwritten signature in blue ink that reads "Michael Wolfe". The signature is written in a cursive, slightly slanted style.

Michael Wolfe, PE  
Director of Public Works