

From: [Dave Klotzle](#)
To: [FCGMA](#); [Anselm, Arne](#)
Cc: [Greg Ramirez](#); [Carmen Nichols](#); [K Matsuoka](#); [Eric Maple](#); [Laura Womack](#); [Martinez M](#)
Subject: Camarillo Comments on Draft 5-Year GSP Evaluation
Date: Monday, October 7, 2024 4:52:59 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image008.png](#)
[Camarillo Comments on Draft 5-Year GSP Evaluation 10-07-2024.pdf](#)

WARNING: If you believe this message may be malicious use the Phish Alert Button to report it or forward the message to Email.Security@ventura.org.

To: Fox Canyon Groundwater Management Agency

The City of Camarillo appreciates the opportunity to review the Draft 5-Year GSP Evaluation and herewith submits the attached comments.

Please do not hesitate to contact us with any questions or requests for additional information.

Sincerely,

Dave Klotzle, Director of Public Works

[City of Camarillo](#) | 601 Carmen Drive, Camarillo, CA 93010



Please note email correspondence with the City of Camarillo (and attachments, if any) are subject to the California Public Records Act which authorizes public disclosure (unless otherwise exempted from disclosure under the Act). The information contained in this email is intended only for the use of the named addressee(s). If you received this message in error, please notify the sender of its receipt by calling (805) 388-5300, and subsequently delete and/or destroy this document along with any attachments.



City of Camarillo

601 Carmen Drive • Camarillo, CA 93010

Office of the City Manager
(805) 388-5307
FAX (805) 388-5318

October 7, 2024

Arne Anselm, Interim Executive Officer
Fox Canyon Groundwater Management Agency
800 South Victoria Ave., No. 1600
Ventura, CA 93009

Submitted via email to:
arne.anselm@ventura.org
FCGMA@ventura.org

RE: Comments on Draft 5-Year GSP Evaluation Draft Documents

Dear Mr. Anselm:

Thank you for your efforts in producing the draft 5-Year GSP Evaluation documents and circulating them for review. The City of Camarillo's specific comments are below.

In general, however, the City is concerned that the draft 5-Year GSP Evaluation does not adequately reflect the unique purpose of the City's North Pleasant Valley Groundwater Desalter facility (Desalter). Consistent with Regional Board directives and Fox Canyon Groundwater Management Agency (FCGMA) Resolution No. 2016-04, the Desalter is intended to improve water quality in the Pleasant Valley Basin by extracting, and treating for beneficial use, brackish groundwater in the northern Pleasant Valley Basin. The extraction and treatment of brackish water to groundwater levels prior to the brackish water entering the basin is consistent with FCGMA Resolution No. 2016-04, and is distinct from minimum thresholds used in the report to analyze pumping in Pleasant Valley Basin that causes seawater intrusion. The final 5-Year GSP Evaluation therefore should not treat the Desalter's operations as being essentially equivalent to other types of groundwater pumping by, among other things, suggesting that the Desalter's operations could cause undesirable results if project pumping exceeds minimum thresholds, as operation of the Desalter is governed by the Resolution to achieve basin water quality objectives (see draft 5-Year GSP Evaluation, page 39 of the PDF document.).

1. As noted in the Executive Summary, the purpose of Camarillo's Desalter facility is to extract brackish groundwater from the Northern Pleasant Valley Basin (NPVMA) to address the water quality issues identified by the Regional Board and included in the Basin Management Plan adopted by the FCGMA. Additionally, the Camarillo Sanitary District (CSD) was issued a Time Schedule Order by the Regional Board

requiring measures to achieve water quality objectives for salts which is being realized by Camarillo's substantial capital investment in the successful construction and continued operation of the Desalter.

The Desalter facility operates under a permit issued by the Division of Drinking Water but is also governed by the Mitigation and Contingency Plan (MCP) that was developed by the City of Camarillo as lead agency in the California Environmental Quality Act (CEQA) process for the Desalter project, in coordination with FCGMA. The MCP was adopted by the FCGMA as part of Resolution No. 2016-04 that includes technical parameters and reporting for the Desalter, and also reiterates the purpose of the project as: "the Desalter Project will have a 25-Year life expectancy, after which it is anticipated that groundwater levels in the Pleasant Valley groundwater basin will be at conditions prior to the brackish water entering the basin, and will be allowed to recover to sustainable conditions." Conditions prior to brackish water entering the basin may be lower than Minimum Thresholds being considered by the 5-Year GSP Evaluation, and minimum groundwater levels or triggers in the MCP should be based on the stated project purpose in the Resolution.

No changes to Minimum Thresholds should be presented in the 5-Year GSP Evaluation that would limit the purpose of the Desalter as noted in the Resolution, and text of the 5-Year GSP Evaluation should be updated to clarify this. Additionally, as noted in Section 2.2.1.4 of the 5-Year GSP Evaluation (page 28 of PDF document), "declines in groundwater elevation in the eastern part of the NPVMA are less likely to influence seawater intrusion in the Oxnard Subbasin", so distinction needs to be taken when comparing Minimum Thresholds designed to mitigate against seawater intrusion to Desalter project operation. See attached requested changes to the 5-Year GSP Evaluation document related to this comment item.

2. Regarding well 19M05 mentioned in Section 6.2.3.1 Minimum Thresholds, on page 112 of the PDF document, notes that "Groundwater elevations at this well are strongly influenced by groundwater production from the North Pleasant Valley Desalter Project." This well location may also be influenced by other nearby wells. Please update the document to include technical information to justify the strong link suggested or insert language that further studies/evaluations are needed.
3. During the 5-Year GSP Evaluation and presentation on September 10, 2024, it was noted that the quantity of recycled water produced by the Camarillo Sanitary District and provided to Camrosa Water District (Camrosa), ultimately Pleasant Valley County Water District (PVCWD), was double counted and the United Water Conservation District (UWCD) model would need to be re-run and the 5-Year GSP Evaluation be updated to reflect this. Please revise document to correct this.
4. The Executive Summary and various other locations in the document should be updated to better describe how pumping in the Pleasant Valley Basin (PVB) causes seawater intrusion into the Oxnard Subbasin given there is a net flow of groundwater from the PVB into the Oxnard Subbasin, and pumping from the

Oxnard Subbasin seems to contribute to a much larger impact to seawater intrusion than the PVB. More modeling analysis is needed to isolate the impact of inland pumping on seawater intrusion for technical evaluation and consideration to better understand how sustainable yield numbers are produced.

5. In Section 3.2.5.2 - Benefits and Impacts of Project No. 6 (UWCD Extraction Barrier and Brackish Water Treatment (EBB) Project) is described in a way that appears to equally benefit the sustainable yield of the Oxnard Subbasin and PVB and it notes “project impacts are intended to increase sustainable yield for all users”, but in the Executive Summary Table ES-3 it shows that there is no or marginal proportional benefit to the PVB sustainable yield (Lower Aquifer System yield actually goes down) by the EBB project. Please update the document to more clearly describe the benefits of EBB project on the PVB sustainable yield.
6. Related to new projects listed in the 5-Year GSP Evaluation in Section 3.2 – Newly Identified Projects and Management Actions on page 53 of the PDF document, it would be helpful to note that some projects listed received the DWR GMA Grant administered by FCGMA and are moving forward while others are waiting for funding to move forward. Please note that the following projects for feasibility studies were submitted as part of Camarillo’s application the SGM Grant, and did not receive funding so are not scheduled to move forward at this time: 13, 14, 15, and 16. Project No. 12: Camarillo Stormwater Diversion to WRP Feasibility Study, received the SGM Grant for the feasibility study and is currently underway. Please update the 5-Year GSP Evaluation to reflect these comments.
7. Related to the newly identified Project No.14: Camarillo Desalter Expansion Feasibility Study noted in Section 3.2.13.1 on page 63 of the PDF document, notes that “The groundwater elevation data collected after the NPV Desalter began operations and the actual volume of potable water produced by the NPV Desalter will be used to help assess whether there is the potential for additional groundwater production in this area and treatment by the NPV Desalter.” Please amend this statement to reflect that the NPV Desalter could also be expanded by bringing in outside water sources by other agencies for treatment for the benefit of the region (Calleguas Municipal Water District is currently evaluating this), so assessment of expansion isn’t only dependent on groundwater conditions.
8. It is unclear whether Desalter pumping during the first half or so of the sustaining period is included in the sustainable yield. Any Desalter pumping occurring in the sustaining period should be backed out of the sustainable yield estimate because the Desalter pumping is supplied from a temporary surplus in the Basin. Please update the document to clarify this.
9. It is not clear whether the pumping reduction schedules for the three “No New Projects” scenarios were applied to the Desalter project pumping. The Desalter project has a separate and fixed groundwater allocation to address environmental groundwater quality issues in the basin as noted in FCGMA Resolution 2016-04 and should not be reduced as part of the scenarios. Please update the document to clarify this.

The City is aware of the comments Camrosa has regarding the draft 5-Year GSP Evaluation. Given the importance of the 5-Year GSP Evaluation and the City and Camrosa's concerns, the City is requesting that it be permitted, with Camrosa, to present its comments to the full Board at an upcoming meeting.

Sincerely,



Greg Ramirez
City Manager

Enclosed: Requested Changes to Section 2.2.4.1 DWR Recommended Correction Actions

City of Camarillo - Draft First Periodic Evaluation – Groundwater Sustainability Plan for the Pleasant Valley Basin (5-Year GSP Evaluation) – August 2024

Requested changes on PDF page 39, in Section 2.2.4.1 DWR Recommended Correction Actions, in subsection titled Adequacy of Groundwater Level Thresholds as Proxies for Groundwater Quality – North Pleasant Valley Management Area:

Please add **text shown in red**, and remove words with ~~strike through~~ from the text taken from the report as shown below:

The primary mechanism in place to address degraded water quality in the NPVMA is the NPV Groundwater Desalter project. This project, which is led by the City of Camarillo, aims to pump brackish water from the PVB and serve the treated water in areas impacted by historical inflows of poor-quality water from the LPVB (City of Camarillo 2015). The NPV Groundwater Desalter project operates under a Monitoring and Contingency Plan (MCP) that was developed in coordination with FCGMA, **and approved as part of FGMA Resolution No. 2016-04**. The MCP defines groundwater elevation, quality, seawater intrusion, and land subsidence contingency thresholds that, in effect, ensure that the project operates as ~~designed~~ **described in Resolution No. 2016-04: “The Desalter Project will have a 25-year life expectancy, after which it is anticipated that groundwater levels in the Pleasant Valley groundwater basin will be at conditions prior to the brackish water entering the basin, and will be allowed to recover to sustainable conditions.”**

The groundwater elevation contingency threshold established in the NPV Groundwater Desalter project MCP requires project-related pumping to reduce once the groundwater elevation at well 02N20W19M06S or 02N20W19E01S drops below -126 ft. msl. The GSP established the minimum threshold groundwater elevation at the one existing key well in the NPVMA, 02N20W19M05S, at -135 ft. msl. This key well is located near the groundwater elevation contingency wells established in the NPV Groundwater Desalter MCP. **Temporary exceedances of the 02N20W19M05S minimum threshold may occur while the MCP contingency measures are progressively implemented.**

The City of Camarillo, in coordination with FCGMA, is in the process of developing a revised MCP **while ensuring it still meets the intent of the project as noted in the Resolution 2016-04**. The current minimum threshold groundwater elevation at well 02N20W19M05S does not interfere with operation of the NPV Groundwater Desalter Project, **and serves as indicator of groundwater conditions in the NPVMA due to the Desalter Project along with wells 02N20W19M06S and 02N20W19E01S.** ~~and, therefore, is appropriate to assess undesirable results associated with degraded water quality in this part of the PVB. The appropriateness of this minimum threshold will be re-evaluated when the MCP revisions are complete.~~ FCGMA, in coordination with the City of Camarillo, will continue to monitor groundwater level and quality conditions in the NPVMA through implementation of the NPV Groundwater Desalter project. As part of this, FCGMA will evaluate the appropriateness of each contingency threshold, their relation to the SMC established in the GSP, and undesirable results associated with degraded water quality in the PVB.