

From: [Jared Bouchard](#)
To: [FCGMA](#)
Subject: Pleasant Valley County Water District comments on Draft First Periodic Evaluations of the GSP for Oxnard Subbasin and Pleasant Valley Basin
Date: Monday, October 7, 2024 1:20:13 PM
Attachments: [PVCWD Comments on Draft First Periodic Evaluations of the Groundwater Sustainability Plans for the Oxnard Subbasin and Pleasant Valley Basin.pdf](#)

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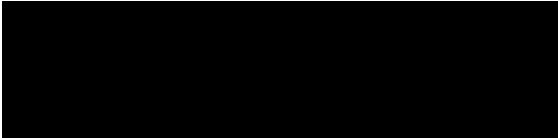
Good afternoon,

Please see attached written comments submission.

Thank you,
Jared

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October 7, 2024

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Via E-mail to FCGMA@ventura.org.

Re: Pleasant Valley County Water District Comments on Draft First Periodic Evaluations of the Groundwater Sustainability Plans for the Oxnard Subbasin and Pleasant Valley Basin, dated August 2024

Dear Mr. Anselm,

Pleasant Valley County Water District (PVCWD) thanks you for the opportunity to provide comments on the above-reference documents (evaluation reports). The first periodic evaluations of the Groundwater Sustainability Plans (GSPs) for the Oxnard Subbasin and Pleasant Valley Basin are important milestones on the path to sustainability for the Basin. We offer the following comments from the perspective of the agricultural water system that serves as the primary “hub” of agricultural water routing in both the Oxnard Subbasin and Pleasant Valley Basin and in the spirit of fostering increased coordination and collaboration to facilitate the planning necessary to achieving the goals of the Sustainable Groundwater Management Act (SGMA).

Comments

1. Water Demand/Supply Assumptions:

Table 1 summarizes PVCWD’s understanding of the future baseline water supplies assumed for PVCWD that were used at the starting point for the modeling performed in support of the evaluation reports. As can be seen in Column No. 3, there is incomplete and conflicting information in the evaluation reports concerning the various water supplies that are assumed will be available to PVCWD under future baseline conditions. Also, the evaluation reports provide no information about the assumed year-to-year or month-to-month timing of deliveries for review from an operational standpoint. For these reasons, PVCWD undertook a significant effort develop a better understanding of the future baseline water supply assumptions for PVCWD. This effort took several weeks and involved numerous model input data requests and questions

to Dudek and UWCD. The results of this effort are presented in Column No. 4. Additionally, Column No. 5 shows the difference between the baseline water supplies calculated from the model inputs (Column No, 4) and the actual current average supplies (Column No. 2).

**Table 1
Summary of Historical and Assumed Future Baseline PVCWD Water Supplies**

1	2	3	4	5
Water Source	Current Average Supplies (2016-2022)¹ (AFY)	Future Baseline Average Supplies per GSP Evaluation Text (AFY)	Future Baseline Average Supplies per Model Input Data² (AFY)	Difference Model minus 2016-2022 (Col. 4 minus Col. 2) (AFY)
UWCD PVP ³	739	5,100	6,254	5,515
Camrosa:				
CCD	3,721	4,000 (per Dudek, this will increased to 4,383 in final evaluation reports)	? (breakout not provided)	?
CWRF	419	"a portion" of 2,600 per PV GSP Eval. and "a portion" of 2,300 per Oxnard GSP Eval.	? (breakout not provided)	?
CAMSAN	1,029	1,500 per PV GSP Eval. and 1,400 per Oxnard GSP Eval.	? (breakout not provided)	?
Subtotal Camrosa:	5,169	See above	6,864⁴	1,696⁴
AWPF	779	500 to PV Basin per PV GSP Eval.; Oxnard GSP Eval. does not say	851	72
PVCWD Wells	7,883	"Average annual extractions from the Subbasin equal to the 2016 to 2022 average, adjusted by surface and recycled water availability."	2,652	(5,231)
Total:	14,570	?	16,622	2,052

Notes:

AWPF = Advanced Water Purification Facility

CAMSAN = Camarillo Sanitation District

CCD = Conejo Creek Diversion

CWRF = Camrosa Water Reclamation Facility

PVP = Pleasant Valley Pipeline

1) Evaluation reports use the 2016-2022 period to calculate the "current average."

2) Double-count of CAMSAN is accounted for in numbers below.

3) Includes Saticoy Wells & State Project Water

4) Per Dudek, the modeling is being updated and this will be increased by 383 AFY.

- UWCD PV Pipeline: The assumed average supply seems reasonable. The large difference with 2016-2022 period is due to drought and operational issues.
- Camrosa Supplies: The assumed supplies are 1,700 acre-feet per year (AFY) higher than the 2016-2022 average. This difference will increase to 2,100 in the final modeling and final evaluation report¹. While it would be fantastic if the assumed water deliveries indeed happen during over GSP implementation and sustaining periods, there are numerous reasons why the deliveries could fall short of the assumptions, e.g., contractual considerations, economics, regulatory changes, operational constraints, water quality, etc.
- Oxnard AWPf: The assumed supply is 72 AFY higher than the 2016-2022 average. As with the Camrosa supplies, it would be fantastic if the long-term availability of AWPf water turns out to be 851 AFY, but there are numerous reasons why it may not, e.g., contractual considerations, economics, competition with other potential uses, operational constraints, etc.
- PVCWD Wells: The assumed supply is 2,652 AFY, which is 5,231 AFY lower than the 2016-2022 average. This represents a significant reduction in assumed pumping. As discussed in Comment No. 2 later in this letter, the significantly lower assumed PVCWD groundwater pumping is driving the proposed the MT/MO changes for the pumping depression management areas as the assumed low pumping is a chief reason the model is predicting higher groundwater levels in the pumping depression management areas compared to the GSP modeling.

PVCWD also evaluated the annual variability in the assumed future PVCWD baseline water supplies. Figure 1 shows stacked bars showing the annual variability in the assumed baseline PVCWD water supplies by source and the total assumed PVCWD baseline water supply. The range of total assumed PVCWD baseline water supply seems reasonable when compared with the current average; however, it is noted that PVCWD has delivered significantly more water in the past, as shown in Figure 2. Additionally, supplies are larger in wet periods and vice versa, which is contrary to the historical pattern, as shown in Figure 2.

¹ Per Dudek, updated modeling is being performed with increased Conejo Creek Diversion supplies assumed (4,383 AFY vs 4,000 AFY).

Figure 1
PVCWD Future Baseline Water Supplies Used in Draft GSP Period Evaluation Reports

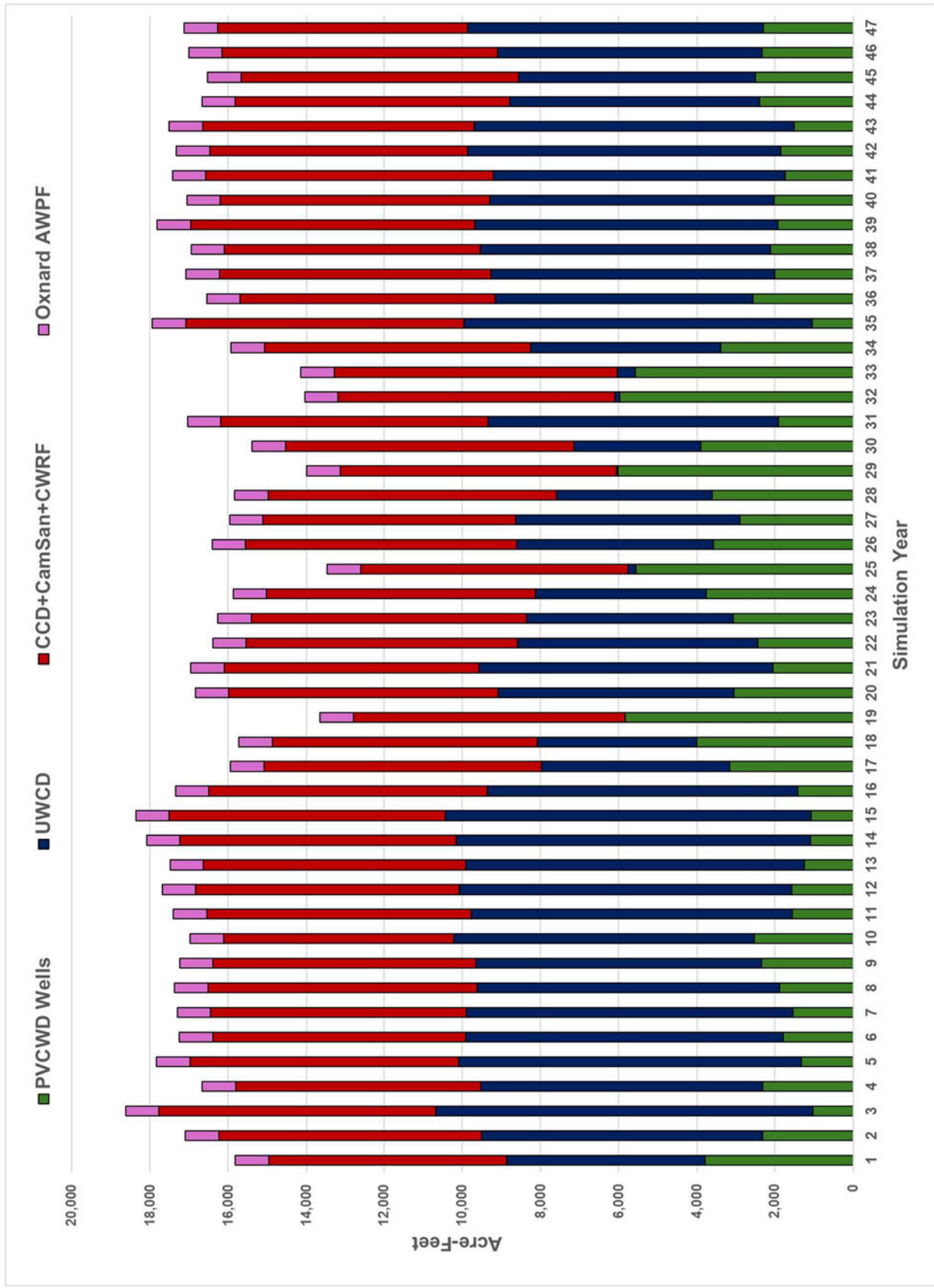
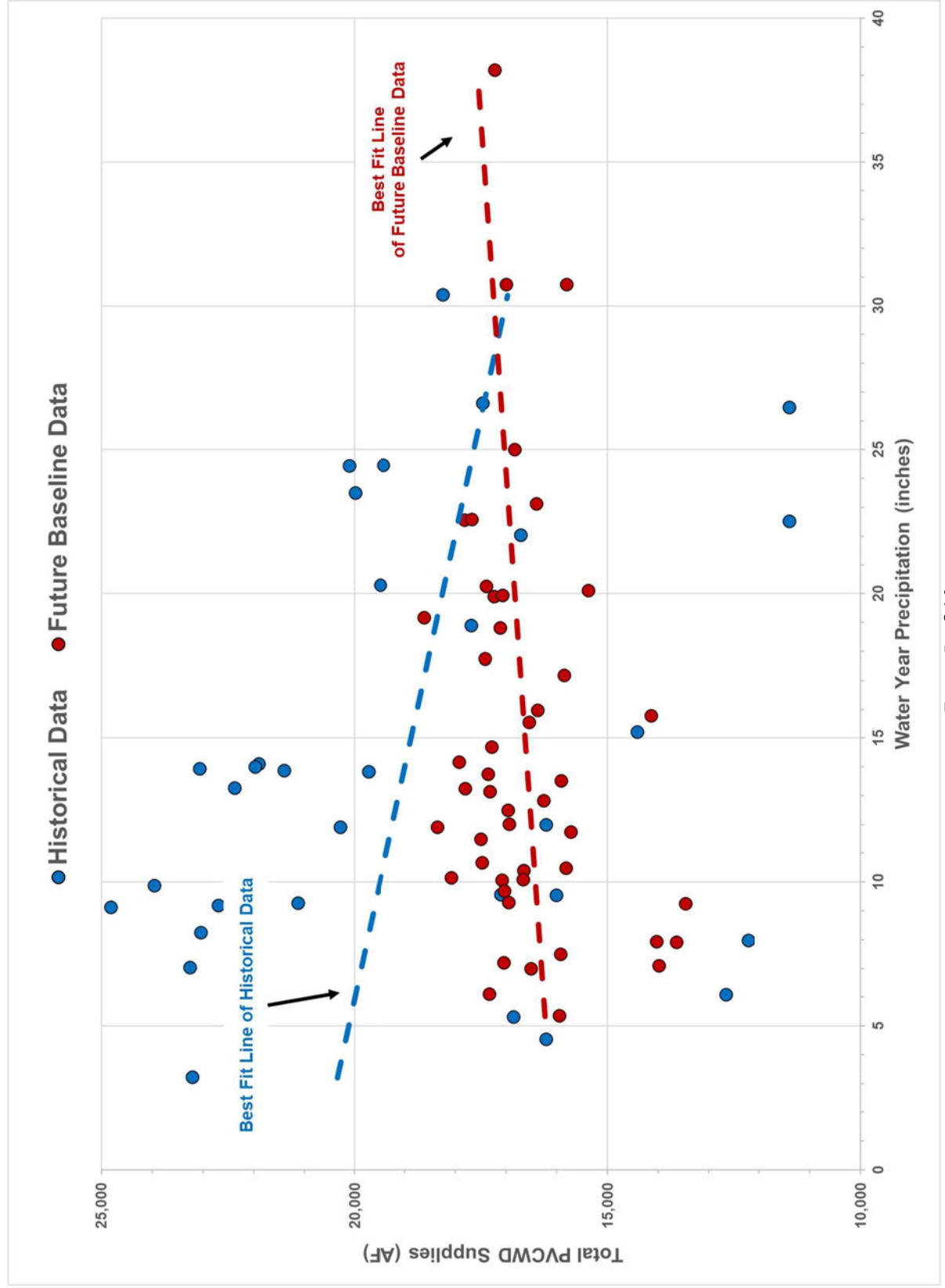


Figure 2
PVCWD Water Supplies Versus Precipitation
Historical and Future Baseline



The evaluation reports do not explain how PVCWD demands are estimated. However, it was inferred from conversations with Dudek that the UWCD Oxnard Plain Surface Water Distribution Model developed in 2021 was used to estimate PVCWD demands. The Oxnard Plain Surface Water Distribution Model report (UWCD OFR 2021-03) states that PVCWD area demands assumed to be equal to 2015-2017 average pumping plus 1,300 AFY of Conejo Creek diversions. These assumptions are not consistent with actual water supplies (demand) during the 2015-2017 period. Table 2 below shows the assumed versus actual demands during the 2015-2017 period. As shown in Table 2, the assumed demands are approximately 2,400 AFY lower than the actual demands, which is significant.

**Table 2
Assumed Versus Actual 2015-2017 PVCWD Water Demand**

Supply Source	UWCD Surface Water Distribution Model Assumptions (AFY)	Actual 2015-2017 Demands (AFY)	Difference (AFY)
UWCD PVP ¹	-	-	-
CCD	1,300	2,503	1,203
CWRF	-	-	-
CamSan	-	-	-
AWPF	-	1,169	1,169
PVCWD Wells	12,054	12,054	-
Total	13,354	15,726	2,372

Notes:

AWPF = Advanced Water Purification Facility

CAMSAN = Camarillo Sanitation District

CCD = Conejo Creek Diversion

CWRF = Camrosa Water Reclamation Facility

PVP = Pleasant Valley Pipeline

1) Includes Saticoy Wells & State Project Water

In summary, despite significant efforts by PVCWD to develop an understanding of water supply assumptions for the modeling and evaluation reports, many questions remain. Additionally, the numbers are still changing as modeling is ongoing during the comment period and the actual results that will be used in an updated version of the evaluation document are pending or are at least not publicly available as of the comment deadline. Based on what information we have been able to gather and analyze, we conclude that the assumptions for PVCWD demands and water supplies are questionable and need further explanation, evaluation, and discussion with PVCWD and others prior to finalizing the evaluation reports. Specific comments are as follow:

- Overall, the assumptions for PVCWD demands and water supplies are

questionable and unverifiable and need further explanation and discussion with PVCWD and others prior to finalizing the evaluation reports.

- The assumed PVCWD water demands are too low. Per the UWCD methodology the demands may be as much as approximately 2,400 AFY low (Table 2).
- The variability of supplies/demands does not follow expected pattern of decreasing in wet year and increasing in dry years (Figure 2).
- Camrosa and Oxnard AWPf supplies are approximately 2,200 AFY higher than the 2016-2022 average. While it would be fantastic if the assumed water deliveries indeed happen during over GSP implementation and sustaining periods, there are numerous reasons why the deliveries could fall short of the assumptions, e.g., contractual considerations, economics, regulatory changes, operational constraints, water quality, etc. Consideration should be given to including scenarios that assume lower supply volumes so that the resulting effect on seawater intrusion and MT/MOs can be understood.
- The plan review/update process needs to include more focused outreach and collaboration when developing model scenario assumptions. As the primary “hub” of water routing to agricultural in both the Oxnard Subbasin and Pleasant Valley Basin one would expect that PVCWD would have been consulted while the water demand/supply assumptions were developed for the evaluation reports, but there was no outreach to us at all to discuss whether the water supply assumptions for the scenarios are realistic, operationally feasible, and consistent with current understanding of contracts, etc. This is disappointing and inconsistent with the stakeholder outreach mandate in SGMA. The easy fix for this would be to start the process sooner and perform targeted outreach and collaboration to water systems in planning areas. In addition, future Dudek and UWCD contracts should include scope and budget for focused meetings with water system operators to review water demand/supply and operational assumptions.
- Too much effort was required to develop an (incomplete) understanding of the water demand/supply assumptions for the PVWCD water system. More documentation and outreach are needed. More access to data and UWCD staff are needed to provide clarifications. The process to obtain data and clarifications was cumbersome and incomplete because Dudek did not have much of the data and knowledge about the assumptions and UWCD staff were reluctant to help because their contract with FCGMA does not include scope and budget for them to respond to data requests and questions. The easy fix is to include scope and budget in future Dudek and UWCD contracts that addresses data requests and clarifications.
- As explained in the next comment, PCVWD is concerned because the questionable water supply assumptions are baked into the modeling that is

being used to propose minimum threshold and measurable objective changes. The MTs and MOs should not be based the results of model scenarios that have unverifiable and questionable assumptions. Rather, consistent with our comments on the draft GSP, the MTs and MOs would ideally be on empirical data that demonstrate what conditions must be met to avoid undesirable results in the basins. At a minimum, more simulations should be performed so the impact of various water supply assumptions on seawater intrusion and MT/MOs can be understood.

2. Minimum Threshold and Measurable Objective Changes:

Consistent with PVCWD's comments on the draft GSP, we continue to assert that MT/MO should be based on empirical data where possible, not results from a very limited number of model scenarios. Using empirical data would ensure that the MT/MO reflect groundwater levels that are actually necessary to achieve the sustainability goal, as opposed to levels that come out of a singular model scenario that is based on questionable and unverifiable future water supply assumptions. Nothing in the model results definitively determine or demonstrate whether the simulated groundwater levels in the pumping depression areas must be as high as proposed to achieve the sustainability goal. For example, consider a model scenario with no pumping at all. While such a scenario would undoubtedly be sustainable, the groundwater levels produced by that model scenario would be higher than the actual groundwater levels necessary to meet the sustainability goal. The same concept applies to any other model scenario that achieves the sustainability goal – *just because a model scenario achieves the sustainability goal does not necessarily mean the predicted groundwater levels are the lowest levels that must be avoided to achieve the sustainability goal.*

The proposed MT/MO changes for the pumping depression management areas are clearly driven by the PVCWD water demand and supply assumptions discussed at length in Comment No. 1. It appears the primary reason the model is predicting higher groundwater levels in the pumping depression management areas compared to the GSP modeling is because the model is being asked to simulate significantly less PVCWD pumping (because of the assumed increase in non-groundwater water supplies to PVCWD). It is unknown whether all the non-groundwater supplies assumed will be available and deliverable to PVCWD in the quantities assumed. Another factor contributing to artificially high model groundwater levels is the fact that private wells is modeled using an *average* rate during dry periods. Certainly, private wells will pump more than the average rate during dry periods. In addition to these factors, the scenario used to prepare recommended MT/MO arbitrarily reduces the already low PCVWD pumping (and other pumping) by another 15% to 65%. All of these factors contribute to a very optimistic simulation of future groundwater levels in the pumping depression management areas upon which the proposed MT/MO changes are based. Consistent with our comments on the draft GSP, it has not been demonstrated whether the reductions to inland pumping (in this case 15 to 65%) are necessary to achieve the sustainability goal.

The proposed MT/MO changes, especially in the pumping depression management areas, should be tabled pending vetting and further analysis the approach of using model results from a limited set of scenarios to set MT/MO, the future water demand/supply assumptions for the PVCWD system, and the assumption of average pumping rates for private wells. There is no compelling reason to modify the MT/MO at this time. It is not an absolute requirement under SGMA².

3. Impacts of Inland Pumping on Seawater Intrusion Are Not Understood:

The impact of inland pumping on seawater intrusion has not been quantified for technical evaluation and consideration in policy making. Rather, the modeling has included various combinations of pumping rates in different areas which does not allow for isolation of the effects of pumping from one area versus another. The GSP and evaluation reports simply assume that inland pumping has an impact on saline intrusion. In reality, it is unclear rate of groundwater pumping in the inland areas that is necessary to address seawater intrusion. The resulting MT/MO and sustainable yield are flawed for these reasons. More modeling analysis is needed to isolate the impact of inland pumping on seawater intrusion for technical evaluation and consideration in policy making. The proposed MT/MO changes should not be approved pending this analysis and the sustainable yield values presented in the evaluation reports should be caveated accordingly.

4. Project Implementation:

PVCWD applauds the efforts of the FCGMA Board, FCGMA staff, FCGMA Operations Committee, and stakeholders that has led to a significantly expanded suite of potential projects in the evaluation reports compared to the GSP. We are particularly encouraged by the potential benefits of the Seawater Intrusion Extraction Barrier and Brackish Water Treatment Project (EBB) and progress made thus far on that project.

It is noted that a significant portion of the 15 years remaining to meet the sustainability goal will pass before EBB has become fully operational and there is confirmation that the anticipated benefits are being realized over a range of pumping and climate conditions. For this reason, PVCWD believes that project planning should proceed on a parallel path with EBB implementation to provide a contingency plan should EBB not proceed to full scale for whatever reason or if EBB at full scale does not provide the full anticipated benefits.

² GSP Emergency Regulations § 356.4. (c): "...the setting of minimum thresholds and measurable objectives, shall be reconsidered and revisions proposed, *if necessary*." (emphasis added).

PVCWD proposes a Project Implementation Task Force to assist the FCGMA Board, staff, and Operations Committee with developing an Infrastructure Master Plan (IMP). The IMP would be a strategic document that provides a framework to guide the timing and coordinated implementation of projects. We see a need for the Project Implementation Task Force and IMP because time is short and there is a large amount of work and coordination needed to move projects from a list on paper to implementation in a coordinated manner. This is particularly true because project planning and implementation is currently decentralized amongst numerous project sponsors. We also believe the Project Implementation Task Force and IMP development process would help address the need for more outreach and engagement with water system operators such as PVCWD, as was discussed in Comment No. 1.

The proposed Projects Implementation Task Force would be composed of representatives from entities that recharge, move, exchange, or store water in the basins and a FCGMA representative. The Projects Implementation Task Force would report to the FCGMA Operations Committee and would be tasked with:

- 1) Facilitating coordinated planning of projects;
- 2) Identifying project synergies;
- 3) Identifying new project alternatives or concepts not previously considered;
- 4) Identifying and developing solutions for any project conflicts;
- 5) Identifying management actions to optimize project operations (for example, a program for inter-service area transfers is needed within the PVCWD service area to optimize the use of non-groundwater supplies);
- 6) Validating water demand and supply assumptions for modeling and GSP periodic evaluations; and
- 7) Addressing any other matters assigned by the FCGMA Operations Committee or FCGMA Board.

Closing

Thank you for considering our comments. Please feel to contact me for further information or if you have questions about our comments.

Sincerely,


Jared Bouchard, General Manager