

From: [Maureen McGuire](#)
To: [FCGMA](#)
Cc: [Jodi Switzer](#)
Subject: GSP Evaluation Draft Comment
Date: Monday, October 7, 2024 4:14:16 PM
Attachments: [GSA 5 Year Comment letter Final 10_7_24.pdf](#)

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Good afternoon,

Please see the attached letter outlining the Farm Bureau of Ventura County's comments on the 5-Year GSP Evaluation Draft Documents. We appreciate the opportunity to provide feedback and we look forward to working with you.

All the best,

Maureen McGuire
CEO
Farm Bureau of Ventura County

October 8th, 2024

Electronically submitted to fcgma@ventura.org

Subject: Comments on Fox Canyon Groundwater Management Agency's 5-Year GSP Evaluation Draft Documents

Dear Fox Canyon Groundwater Management Agency,

On behalf of the Farm Bureau of Ventura County, we appreciate the opportunity to provide comments on the 5-Year Groundwater Sustainability Plan (GSP) Evaluation Draft Documents for the Oxnard, Pleasant Valley, and Las Posas Valley subbasins. We commend the Agency's efforts to manage groundwater sustainably, and we would like to emphasize key areas of concern and offer suggestions to help support Ventura County's agricultural community, which is the backbone of our local economy.

1. Long-Term Hydrologic Trends and Agricultural Resilience

The evaluation notes that much of the implementation period was marked by below-average rainfall, compounding issues like saltwater intrusion. While the wetter years of 2023 and 2024 brought temporary relief, we cannot rely on sporadic wet periods to offset prolonged droughts. Agriculture in Ventura County is especially vulnerable to groundwater shortages, as it relies heavily on stable water supplies to maintain productivity. We recommend that the Agency adopt a forward-thinking approach by investing in infrastructure that improves water storage and capture during wet years. For example, expanding recharge basins and stormwater capture systems would help retain water locally, benefiting both agriculture and the broader community during future dry cycles.

2. Infrastructure Investment as a Collaborative Solution

While we understand the Agency's focus on demand management, infrastructure projects such as water recycling, desalination, and expanded recharge facilities must be prioritized to ensure a sustainable water future. Delays in these projects put undue pressure on agricultural operations, which could face disproportionate impacts from reduced groundwater availability. Instead of focusing solely on restrictions, a balanced approach that encourages infrastructure investment will help maintain agricultural productivity while advancing groundwater sustainability goals.

Collaboration between the Agency, local governments, and the agricultural community is crucial to move these projects forward. For example, streamlined permitting processes and the development of public-private partnerships can accelerate the construction of water infrastructure, ensuring that vital projects are completed in a timely manner. This type of collaboration also helps avoid the need for more stringent groundwater extraction limits, which would have severe economic consequences for farmers.

3. Avoiding Unintended Financial Burdens on Farmers

As we look toward future management actions, it is essential to minimize the financial burden placed on farmers. Agriculture already operates on narrow margins, and the cost of implementing water conservation measures, purchasing water, or paying for infrastructure upgrades could be prohibitive for many growers. We strongly encourage the Agency to consider funding models that do not pass excessive costs onto farmers. Options such as state or federal grants, low-interest financing, and cost-sharing agreements should be explored to fund water infrastructure projects. This approach will help ensure that farmers are not forced to bear the full financial responsibility for groundwater sustainability, which could otherwise lead to reduced agricultural output, job losses, and pose nation-side food security risks.

4. Addressing Saltwater Intrusion Proactively

The issue of saltwater intrusion, particularly in the lower aquifers, is critical. We support the Agency's long-term projects, such as the Extraction Barrier and Brackish Water Treatment initiative.

5. Economic Impact on Agriculture

Groundwater management decisions must consider the broader economic impacts on agriculture, which is essential to nationwide food security. Farmers face increasing costs for logistics, labor, and inputs, and additional costs associated with groundwater management could push many operations into financial distress. We encourage the Agency to conduct a more detailed analysis of the economic implications of proposed projects and management actions. For instance, measures that raise water costs or limit water availability need to be carefully balanced to avoid unintended consequences such as decreased crop yields or the loss of farmland.

6. Pilot Development of Thoughtful Demand Management for Farmers

Over the next five years, it is critical to explore demand management options that allow farmers to stay in business while balancing water availability as a compliment to large scale infrastructure projects. Recognizing the long timelines and potential challenges of implementing large infrastructure projects, we encourage the Agency to consider temporary, flexible solutions to help farmers adapt to water variability. One such option is an incentive-based program for the temporary fallowing of land, where farmers can voluntarily reduce water use during critical shortages and resume operations when water is more abundant.

A program like this would allow farmers to hedge against the uncertainties of project implementation. If major projects face delays—whether due to permitting challenges, economic viability issues, or legal hurdles—farmers need alternatives to aggressive water-use restrictions. Financially incentivizing the temporary fallowing of land provides a safety net, allowing them to make strategic decisions about water usage without being forced to abandon farming altogether.

Additionally, farmers could be encouraged to transition to less water-intensive crops during periods of drought. By providing financial support and technical assistance for these transitions, the Agency can help farmers mitigate the risks associated with water shortages while continuing to contribute to the region's agricultural economy.

This type of demand management moves away from a "zero-sum" approach that pits different water users against each other in a closed basin. Instead, it offers a flexible, win-win solution that allows farmers to respond to changing conditions without jeopardizing their livelihoods. While implementation of these ideas is not feasible in the next five-years, planning and development could be undertaken including grant-funding cycles such as the Sustainable Agricultural Land Conservation program funded by Department of Conservation. Planning and stakeholder engagement would be essential to ensure that a wide variety of views and edge cases are explored for the purposes of developing a thoughtful and equitable system.

7. The Need for Certainty and Predictability

Given the complexities surrounding water management and the ongoing litigation, it is essential that farmers have a degree of certainty and predictability as they plan for their operations over the coming years. Pending litigation has the potential to drag on for years, and any resulting decisions could reshape the regulatory landscape multiple times throughout that period. This introduces considerable uncertainty for farmers, who rely on stable water availability to sustain their businesses.

To manage this uncertainty, it is crucial that the Agency provides farmers with a framework for continuity in water management, regardless of the legal outcomes. Whether the basin continues to be governed by a Groundwater Sustainability Plan (GSP), whether proposed projects are completed on time, or whether the litigation results in significant changes, there must be a clear, rational path forward to avoid destabilizing agriculture in the region.

Moreover, this continuity is not just about the immediate future but about ensuring that farmers can continue planning long-term investments in their operations. Sudden, unpredictable changes could force them to make costly adjustments or even abandon farming altogether, which would have a lasting negative impact on the local economy and national food supply. Offering a more predictable environment will allow farmers to adapt in a way that maintains agricultural viability while addressing water management needs.

8. Agriculture's Voice

As the various plans outline proposed projects and emphasize stakeholder inclusion in the prioritization process, it is crucial that the agricultural community plays an active, consistent role. Agriculture is a key stakeholder with distinct economic challenges and operational limitations that differ significantly from those of urban areas like cities and municipalities. Without consistent representation and input from farmers, there's a risk that decisions may not fully reflect the needs and realities of the agricultural sector.

Inclusion must be more than a procedural step; it should be a genuine partnership where growers' perspectives are fully considered and integrated into decision-making. Farmers operate on thin margins, and decisions about water allocation, infrastructure improvements, and project prioritization will directly impact their ability to continue farming. Solutions should not disproportionately burden agriculture but instead support their ability to produce food while contributing to sustainable water management.

For instance, the agricultural sector's reliance on groundwater must be factored into discussions about addressing saline intrusion or allocating resources for improvements.

Unlike urban areas, where adjustments to water usage may be easier, farming operations are less flexible, making it essential that proposed projects accommodate these constraints.

The Farm Bureau of Ventura County is committed to working with the Agency to find solutions that ensure both groundwater sustainability and agricultural viability. The path forward requires a balanced approach, with a strong emphasis on investment in infrastructure, collaboration with all stakeholders, and minimizing the financial burden on farmers. We believe that, with the right investments and cooperative efforts, we can secure a sustainable water future that supports agriculture and the entire community.

Thank you for considering our comments. We look forward to continued collaboration and offer our assistance in developing solutions that protect both water resources and the agricultural industry that depends on them.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Maureen McGuire', with a large, stylized flourish at the end.

Maureen McGuire
Chief Executive Officer
Farm Bureau of Ventura County

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