

**From:** [REDACTED]  
**To:** [FCGMA](#)  
**Subject:** Zone Mutual Comments on Draft First Periodic Evaluation of Las Posas Valley Basin Groundwater Sustainability Plan  
**Date:** Sunday, October 6, 2024 3:57:12 PM  
**Attachments:** [Final LPVB 5-yr evaluation letter 10-7-24.pdf](#)

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Mr. Anselm,

Attached is Zone Mutual Water Company's comments to the above referenced document. Please let me know if you have any questions. Thank you for your consideration of Zone Mutual's feedback to the draft GSP.

John D Menne  
President  
Zone Mutual Water Company



October 7, 2024

Arne Anselm, Interim Executive Officer  
Fox Canyon Groundwater Management Agency  
800 South Victoria Avenue  
Ventura, CA 93009

Via E-mail to [FCGMA@ventura.org](mailto:FCGMA@ventura.org).

Re: Zone Mutual Water Company Comments on Draft First Periodic Evaluation,  
Groundwater Sustainability Plan for the Las Posas Valley Basin, dated August 2024

Dear Mr. Anselm,

Zone Mutual Water Company (Zone) thanks you for the opportunity to provide comments on the above-reference document. The first periodic evaluation of the Las Posas Valley Basin (LPVB) Groundwater Sustainability Plan (GSP) is an important milestone on the path to sustainability for the Basin. We offer the following big picture comments from the perspective of a large agricultural water system that straddles western and eastern management areas and in the spirit of fostering increased coordination and collaboration in the planning necessary to achieving the shared goals of the Sustainable Groundwater Management Act and the Judgment in Las Posas Valley Water Rights Coalition, et al., v. Fox Canyon Groundwater Management Agency groundwater rights adjudication case.

### **Comments**

1. **Zone Mutual Water Company Infrastructure Improvement Project:**
  - a. While Zone is moving forward with the infrastructure improvements described in the evaluation report, there are potential legal issues that may prohibit or limit Zone's ability to wheel in-lieu water to non-shareholders. These issues need to be studied along with other opportunities to deliver in-lieu water and move water between West Las Posas Management Areas (WLPMA) and East Las Posas Management Area (ELPMA). The most cost-effective and beneficial method(s) should be identified through this process. We encourage coordination and collaboration on this topic.
  - b. Regarding the 500 AFY of water savings associated with this project, this benefit should not be included in the future water supplies for the Projects Scenario at this time. The water savings would be retained as carryover or leased to other water right holders for the benefit of Zone shareholders unless the Watermaster creates a financial mechanism to make Zone whole. We encourage coordination and collaboration on this topic.
2. **Nexus Between Sustainable Management of the WLPMA and Oxnard Subbasin:** While assessment of impacts on adjacent basins is clearly required under SGMA, the framing and analysis of WLPMA pumping impacts on the Oxnard Basin and the WLPMA sustainable yield estimation approach seem problematic for multiple reasons. First the



analysis has not isolated the impact of WLPMA pumping on seawater intrusion for technical evaluation and consideration in policy making. How can policymakers make sound policy, if the relationship between WLPMA pumping and its incremental effect on seawater intrusion under various management scenarios has not been quantified and vetted? Second, the analysis of the interaction between WLPMA and the Oxnard Subbasin appears to ignore the fact that numerous WLPMA groundwater pumpers pay pump fees to UWCD.

3. Modeling:
  - a. Review of the modeling for the WLPMA cannot be completed at this time because documentation of the Coastal Plan model is not yet available. Technical Advisory Committee (TAC) review should be completed before adopting the periodic evaluation report.
  - b. Zone is concerned that the two models for the Basin no longer agree on the nature of the WLPMA/ELPMA boundary. We support the recommendation for further review of this issue in consultation with the TAC.
4. Missing Monitoring Data: There are a notable number of unavailable groundwater level and quality measurements during period since GSP adoption. It is critical that data be collected to evaluate status relative to the sustainable management criteria and more generally understand groundwater conditions. It is noted that FCGMA does not collect data itself and, instead, relies on other entities monitoring programs for data. It is recommended that FCGMA coordinate with the monitoring entities to find the most cost-effective solution to ensure that data is collected for future GSP annual reports and periodic evaluations.
5. Groundwater Dependent Ecosystems (GDEs): The vegetation found along Arroyo Simi/Las Posas was recruited and is sustained by discharges from two wastewater plants and City of Simi Valley dewatering wells. Zone is concerned that the framing of GDE issue appears to leave the door open making groundwater users responsible for sustaining the vegetation along Arroyo Simi/Las Posas. The framing of this issue needs to be reworked to emphasize that effects on vegetation attributable to reductions in discharges shall not be considered an SGMA undesirable result in the GSP. Similarly, we are concerned about paying to study vegetation that was recruited and is sustained by wastewater and dewatering well discharges.

### Closing

Please feel to contact me for further information our comments.

Sincerely,

John Menne, President, Zone Board of Directors