

**From:** [Mary Jane Reed](#)  
**To:** [FCGMA](#)  
**Cc:** [John Orr](#); [John Orr](#); [David Vanoni](#) [REDACTED] [Virginia Rodriguez](#); [Barbara Brenner](#)  
**Subject:** Del Norte Water Co - Comment on LPV 5-Year GSP Evaluation Draft  
**Date:** Monday, October 7, 2024 3:52:16 PM  
**Attachments:** [image001.png](#)  
[10-7-2024 DNWC FINAL Memo to FCGMA re DUDEK Report.doc](#)  
**Importance:** High

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Please see attached document from Del Norte Water Company.



**Mary Jane Reed**  
Paralegal and Legal Assistant to John C. Orr  
| Ferguson Case Orr Paterson LLP



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# Del Norte Water Company

Post Office Box 4065  
Ventura, California 93007  
Phone (805) 647-1092 Fax (805) 647-2805

October 7, 2024

TO: Fox Canyon Groundwater Management Agency – [fcgma@ventura.org](mailto:fcgma@ventura.org)  
RE: Comment on the First Periodic GSP Evaluation for the LPVB By DUDEK  
FROM: John C. Orr, President

I am John C. Orr, a farmer in the West Las Posas Management Area and President of Del Norte Mutual Water Company. I have reviewed the draft First Periodic GSP Evaluation for the Las Posas Valley Basin (“Draft Report”) by DUDEK released August 22, 2024 and I attended the September 9, 2024 Public Workshop presented by DUDEK.

If the purpose of DUDEK’s work is to review current groundwater conditions, assess GSP implementation and evaluate sustainable yield for an audience of hydrologically trained persons, perhaps it has accomplished what it has set out to do.

If, however, as I believe, its role is to marry the technical components it outlines with the Policy and engagement of the GMA in a report that clarifies what is going on in the Las Posas Basin and inform the landowners of current conditions of the Basin, it falls short for the following reasons:

- (1) The Report does not address the continued serious lack of information and data for the period evaluated.
- (2) Data from key wells was not accessible and suitable replacements were not found in the five year period update. There are not data gaps – there are data chasms.
- (3) There is no explanation as to why private well data was not obtained that could have been used to help fill the significant gaps in the well data.
- (4) The Draft Report does not explain why DUDEK’s (the GMA’s) safe yield for the Basin is 27,600 – 34,000 acre feet, which is not consistent with the GMA and other parties to the Adjudication stipulated safe yield of 36,000 acre feet nor consistent with the Court judgment allocated operational safe yield of 42,851 acre feet.

(5) The Draft Report's states that the Las Posas Valley Basis is not currently experiencing undesirable results however the next sentence states that: "the West Las Posas Management Area experienced undesirable results . . . ."

(6) Most importantly, for any nonscientific reader, it puts the five-year period being evaluated in no historical context. All farmers know intuitively, and because they produced records for, and have reviewed the Master Disclosure Record, that during the period from roughly 2010 to 2022, the area was in drought. Moreover, there was little recharge during that period by the United Water Conservation District ("UWCD") in its spreading grounds that replenish, at least, the shallow wells in the West Las Posas Valley.

(7) Conversely, the winters of 2022 and 2023 were wet – extremely wet – and the recharge by UWCD was extraordinary (reportedly 270,000 acre feet). This recharge impacted the Western end of the Las Posas Basin, significantly. Whether all the data is available for the winter of 2022 or only a portion of the data is available, the Draft Report must review what data is available to date to provide a realistic assessment of the basin. To ignore data that does exist and to fail to mention these significant, if not historic events, leaves a reader to challenge the efficacy of any conclusions the Draft Report may contain.

JCO/mjr