

---

**From:** Lousen, Kendall P CIV USN NAVB VCTY PT MUGU CA (USA) [REDACTED]  
**Sent:** Monday, October 7, 2024 2:37 PM  
**To:** FCGMA <[PWA.FCGMA@ventura.org](mailto:PWA.FCGMA@ventura.org)>  
**Subject:** Naval Base Ventura County (NBVC) Comments on FCGMA's Oxnard Subbasin GSP Public Draft 5-Year Periodic Evaluation Review  
**Importance:** High

Greetings FCGMA Chair West, Board of Directors and FCGMA Staff;

Attached, please find Naval Base Ventura County's transmittal letter and enclosed comments to the FCGMA for Oxnard Subbasin GSP Draft Five-Year Periodic Evaluation Review.

V/r,

Kendall P. Lousen (*He / Him*)  
*Installation Community Planning Liaison Officer*  
Naval Base Ventura County

[REDACTED]  
[REDACTED]  
[REDACTED]





DEPARTMENT OF THE NAVY  
NAVAL BASE VENTURA COUNTY  
311 MAIN ROAD, SUITE 1  
POINT MUGU, CA 93042-5033

IN REPLY REFER TO:  
11011  
Ser N0000CV/846  
October 7, 2024

Mr. Eugene West, P.E.  
Chair of Fox Canyon Groundwater Management Agency Board of Directors  
Fox Canyon Groundwater Management Agency  
800 S. Victoria Avenue  
Ventura, CA 93009

Dear Chair West:


SUBJECT: NAVY COMMENTS ON FOX CANYON GROUNDWATER MANAGEMENT  
AGENCY DRAFT FIVE YEAR PERIODIC EVALUATION REVIEW OF THE  
GROUNDWATER SUSTAINABILITY PLAN FOR THE OXNARD SUBBASIN

Thank you for the opportunity to review and provide comments to Fox Canyon Groundwater Management Agency (FCGMA), regarding the draft five-year periodic evaluation review of the Groundwater Sustainability Plan (GSP) for the Oxnard Subbasin. Additional comments on the Oxnard Subbasin GSP Draft 5-Year Periodic Evaluation Review are included as enclosure (1).

The Navy understands the importance of working together toward a unified goal to restore, manage, and sustain the groundwater resources available to all the residents and communities in Ventura County. We remain committed to exploring collaborative approaches with FCGMA to address important groundwater sustainability issues.

For additional coordination, please contact Mr. Kendall Lousen, Naval Base Ventura County Community Planning Liaison Officer, who can be reached at COMM: (805) 989-0333 or via email: [kendall.p.lousen.civ@us.navy.mil](mailto:kendall.p.lousen.civ@us.navy.mil).

Sincerely,



D. W. BROWN  
Captain, U.S. Navy  
Commanding Officer

## ENCLOSURE 1

### Navy Review Comments on

#### FCGMA Preliminary Draft 5-Year Periodic Evaluation Groundwater Sustainability Plan (GSP) for the Oxnard Subbasin

Comment #	Section #(s)	PDF Page #(s)	GSP Page #(s)	Navy Review Comments
1	5.1; 5.3			FCGMA should clarify the data sources used for recalibration and how new monitoring data were integrated. Recommend conducting sensitivity analyses to address uncertainties in seawater intrusion and sustainable yield projections for the Oxnard Subbasin GSP.
2	5.2; 2.2.3			<p>In discussing future baseline conditions and water budgets in Section 5, there is acknowledgement of uncertainties in the projected seawater flux and sustainable yield estimates. SGMA regulations emphasize the need for transparency around modeling uncertainties and how they are mitigated.</p> <p>A detailed discussion should be included of those uncertainties and how future scenarios are being adjusted in the groundwater model to account for them. This could involve running additional sensitivity analyses to test groundwater model robustness under various climate conditions and different project scenarios.</p> <p>Recommend FCGMA develop contingency plans for potential scenarios where recharge projects and seawater intrusion barriers might not perform as expected or satisfy thresholds of the GSP under SGMA for the Oxnard Subbasin by 2040.</p>
3	5.2.1			FCGMA should expand climate modeling to account for natural disasters and extreme weather events (e.g., droughts, earthquakes, floods, land subsidence, debris flow, wildfires, coastal storms) to detail how varying climate extremes and natural disasters will affect groundwater resources, availability, and management actions.

## ENCLOSURE 1

Navy Review Comments  
on  
FCGMA Preliminary Draft 5-Year Periodic Evaluation Groundwater Sustainability Plan (GSP) for the Oxnard Subbasin

Comment #	Section #(s)	PDF Page #(s)	GSP Page #(s)	Navy Review Comments
4	2.2.4; 5.2			<p>Section 2.2.4 (Degraded Water Quality) and Section 5.2 (Future Scenario Water Budgets and Sustainable Yield): The draft 5-year periodic GSP evaluation report needs to ensure the groundwater model accounts for water quality improvements as well as deterioration in water quality due to factors like seawater intrusion.</p> <p>Section 5.2 of the Draft Evaluation Report needs to clarify how future projects will achieve measurable thresholds of the GSP by 2040; recommend FCGMA develop a contingency plan for future projects with mitigation measures and implementation strategies.</p>
5	6.0			<p>Section 6 (Sustainable Management Criteria "SMC"): The Draft report discusses revisions to SMCs for water quality and seawater intrusion but needs additional clarification explaining the revisions to the SMCs for this section of the GSP.</p> <p>It's important the GSP evaluation report clarifies how the groundwater model reflects the movement of seawater intrusion in response to extraction, recharge projects, and a changing climate; including simulation scenarios and showing the different rates of seawater intrusion under future management actions would strengthen compliance with the GSP and SGMA requirements.</p>
6	7.0; 7.2.3			<p>Recommend providing clearer response framework for when/if land subsidence monitoring shows undesirable results; and describe those immediate and long-term management actions (e.g., changes in groundwater extraction policies) will consist of, and especially if prevailing qualitative factors and metrics trigger or exceed land subsidence thresholds.</p>

**ENCLOSURE 1**

Navy Review Comments  
on

FCGMA Preliminary Draft 5-Year Periodic Evaluation Groundwater Sustainability Plan (GSP) for the Oxnard Subbasin

Comment #	Section #(s)	PDF Page #(s)	GSP Page #(s)	Navy Review Comments
				<p>Recommend more monitoring in Oxnard Subbasin using InSAR (Interferometric Synthetic Aperture Radar) technology and how use of this data will be integrated into real-time decision-making for management actions.</p> <p>Incorporating these recommendations would enhance transparency, financial feasibility, and long-term adaptability of the GSP while ensuring its stakeholders and regulatory requirements under SGMA are addressed. This would also contribute to the GSP's robustness, especially for climate resiliency, groundwater quality, and foster inclusion for environmental justice and social equity of its disadvantaged communities in the Oxnard Subbasin.</p>
7	7.4			<p>SMGA emphasizes monitoring for GDEs which is touched upon in Section 7.4, FCGMA should consider adding more detailed explanation of how groundwater modeling includes GDE interactions between surface water and groundwater; particularly where these interactions may impact interconnected surface waters.</p> <p>Recommend FCGMA provide additional data gaps near surface water bodies and potential GDEs identified during the 5-Year GSP Evaluation period would improve reader context for this section of the report.</p> <p>Recommend the GSP evaluation report include specific actions to address these data gaps within the monitoring network, along with any projected implications and improvements to GDEs for the Oxnard Subbasin.</p>

## ENCLOSURE 1

### Navy Review Comments on

#### FCGMA Preliminary Draft 5-Year Periodic Evaluation Groundwater Sustainability Plan (GSP) for the Oxnard Subbasin

Comment #	Section #(s)	PDF Page #(s)	GSP Page #(s)	Navy Review Comments
8	8.0; 8.3			<p>Section 8.3 (Plan Amendments): FCGMA should have a detailed project scope, implementation timeline, transparent fee schedule/funding, and risk impacts/cost analysis for each Project.</p> <p>FCGMA should consider adding potential financial risks and if any associated legal challenges of Projects and show how those factors cumulatively impact the GSP's implementation to achieve sustainability.</p> <p>FCGMA should consider adding an outlined process for committed-full funded, deferred-partial funded, and committed-pending grant/unfunded projects with potential finance mechanisms, mitigation strategies, and pathways to dissolve risks-impacts-challenges through collaboration in unison with all parties/users.</p>
9	9.1			<p>Section 9.1 (Outreach and Engagement): Recommend FCGMA Staff expand the focus on stakeholder feedback in disadvantaged communities by forming a Stakeholder Advisory Group and use multilingual materials for educational outreach and engagement, and to ensure that stakeholder feedback collected in the field is actively integrated into groundwater management decisions.</p>