Fox Canyon Groundwater Management Agency

FULL REVISED AGENDA PACKAGE

Board Special Meeting
of
February 12, 2025

NOTICE OF MEETING

NOTICE IS HEREBY GIVEN that the Fox Canyon Groundwater Management Agency (FCGMA) Board of Directors will hold a **Board Hybrid Meeting** at **12:30 P.M.** on **Wednesday**, **February 12, 2025,** in the **Board of Supervisor's Hearing Room and via Zoom**, at the Ventura County Government Center, Hall of Administration, Main Plaza Level at **800 South Victoria Avenue**, **Ventura**, **California**.

REVISED FCGMA BOARD SPECIAL MEETING AGENDA

February 12, 2025
12:30 P.M.

Welcome to the meeting of the Fox Canyon Groundwater Management Agency Board of Directors, also sitting as watermaster for the Las Posas Valley Basin and the groundwater sustainability agency for the Las Posas Valley Basin, the Pleasant Valley Basin, and the Oxnard Subbasin. For more information, full agenda packets, or past meeting information, visit *www.fcgma.org*.

In compliance with the Americans with Disabilities Act, all possible accommodations will be made for individuals with disabilities so they may attend and participate in meetings. If special assistance is needed, please call Agency staff at (805) 654-2014 at least 24 hours prior to the meeting so proper arrangements may be assured. If requested, and as possible, agendas will be provided in alternative formats.

Agenda items are numbered for identification purposes only and may not necessarily be considered in this order. Agenda items are grouped under Las Posas Valley Watermaster (LPV Watermaster) or under Fox Canyon Groundwater Management Agency (FCGMA), if the item directly applies only to that entity. The Board reserves the right to limit each speaker to five (5) minutes per subject or topic if necessary. The public portion of every public meeting of the Board of Directors is recorded. Please see the "STANDING NOTICES" section at the end of this Agenda for more information, including options for hybrid attendance and public participation.

OPENING

1. **Call to Order** – The Board Chair will call the meeting to order.

2. **Pledge of Allegiance** – A Board member will lead the Pledge of Allegiance.

3. **Roll Call** – Attending Board members, alternates, and staff will be recorded by the Board Clerk.

4. **Agenda Review** – Consider and approve by majority vote, any minor revisions to Board Agenda items and/or attachments and any item(s) added or removed from this Agenda.

5. **Public Comments** – Audience members may speak about Agency-related matters not on today's Agenda. California State law does not allow any response or action from the Board concerning non-agenda topics at this time; however, topics can be placed on future agendas or referred to staff. Please come to the podium and state your name and affiliation for the record before commenting on any particular subject.

6. **Executive Officer's Comments** – Brief announcements and administrative report on Agency workforce activities.

7. **Board Member Comments** – An opportunity for Board Members to make comments or to communicate with other directors, staff, and/or the public regarding non-agenda topics.

CONSENT AGENDA

Routine items are placed under the Consent portion of this Agenda and need only be reviewed and approved by one single motion. Consent Agenda items are grouped under LPV Watermaster or under FCGMA, if the item directly applies only to that entity. Consent items generally require no discussion; however, they may be debated or voted on by moving them to the "Regular Agenda" portion at the Board's discretion.

CONSENT AGENDA – FCGMA Items

8. **Approval of Revised First Periodic Evaluation of the Groundwater Sustainability Plan for the Oxnard Subbasin** – *(New Item)* **RECOMMENDATIONS: (1)** Approve the revised First Periodic Evaluation of the Groundwater Sustainability Plan for the Oxnard Subbasin and **(2)** Direct Agency staff to submit it to the California Department of Water Resources.

9. **FCGMA Budget to Actual Report for January 2025** – *(New Item)* **RECOMMENDATION:** Receive and file the monthly financial report.

CONSENT AGENDA – LPV Watermaster Items

10. **LPV Watermaster Budget to Actual Report for January 2025** – *(New Item)* **RECOMMENDATION:** Receive and file the monthly financial report.

11. **Appointment of Ventura County Waterworks District Nos. 1 & 19 Representative to the Las Posas Valley Policy Advisory Committee** – *(New Item)* **RECOMMENDATION:** Appoint Mr. Jeff Palmer to serve as the replacement nominee for Ventura Waterworks Districts 1 &19 (WMIDs 2011, 2191 and 2192) on the Las Posas Valley Watermaster Policy Advisory Committee.

CONSENT AGENDA – Correspondence Items

Correspondence Agenda items are presented to the Board for information under the Consent Agenda. These items require no action or are not ready for Board consideration.

12. **Receive and file correspondence** from Ventura County Clerk of the Board of Supervisors regarding reappointment verification for the Board of Supervisors representative, dated January 17, 2025.

13. **Receive and file correspondence** from Rob Bonta, State of California Attorney General, regarding Opinion 24-101 concerning staffing the Agency, issued January 22, 2025.

14. **Receive and file correspondence** from Ian Prichard, Deputy General Manager of Calleguas Municipal Water District, regarding election results for the Small Water Districts representative, dated February 3, 2025.

15. **Receive and file correspondence** from Director Kelly Long via the California Department of Water Resources regarding Executive Order N-16-25, dated February 3, 2025.

REGULAR AGENDA

Regular Agenda items are heard at the Board's discretion and may be heard at any time during the meeting. Regular Agenda items are grouped under LPV Watermaster or under FCGMA, if the item directly applies only to that entity.

16. **Resolution of Appreciation for Agency Counsel Alberto Boada** – *(New Item)* **RECOMMENDATION:** Adopt Resolution 2025-01 honoring Agency Counsel Alberto Boada for 18 years of Agency service.

17. **County of Ventura Water Resource Mapping Presentation** – *(New Item)* **RECOMMENDATION:** Receive and file a presentation from the County of Ventura Public Works Agency regarding the development of a Countywide water mapping database.

18. **Calleguas Water Resources Implementation Strategy Presentation** – *(New Item)* **RECOMMENDATION:** Receive and file a presentation from Calleguas Municipal Water District on the Water Resources Implementation Strategy (WRIST).

19. **City of Oxnard Groundwater Recovery Enhancement and Treatment Program Presentation** – *(New Item)* **RECOMMENDATION:** Receive and file a presentation from the City of Oxnard regarding an update to the Groundwater Recovery Enhancement and Treatment (GREAT) Program.

20. **Agency Staffing Analysis Report Presentation** – *(New Item)* **RECOMMENDATION:** Receive and file a presentation by Hallmark Group on the Agency Staffing Needs Analysis. ***Agenda Item revised to add Exhibits.***

21. **Legislative Proposal to Amend Section 10726.6 of the Water Code** – *(New Item)* **RECOMMENDATION:** Approve Support of a Legislative Proposal to Amend the Sustainable Groundwater Management Act (SGMA) to provide that Section 10726.6, Action to Determine Validity of Plan, sets forth the sole process for challenging a groundwater sustainability plan and Authorize the Chair to Sign a Letter of Support. ***Agenda revised to add Item and Exhibits.***

REGULAR AGENDA – FCGMA Items

22. **Legal Services Agreement with Alana Rotter of Greines, Martin, Stein & Richland LLP to Represent the Agency in *City of Oxnard v. FCGMA* Appeals and Cross-Appeals** – *(New Item)* **RECOMMENDATION:** Approve, and ratify the Interim Executive Officer's execution of, a legal services agreement with Greines, Martin, Stein & Richland LLP (GMSR) for Ms. Alana Rotter's representation of the Agency in *City of Oxnard v. FCGMA* appeals and cross-appeals. ***Agenda Item revised to edit Item number.***

CLOSED SESSION AGENDA

Discussions of Closed Session Agenda items are closed to the public. The Chair will announce when the Board is going into closed session. Closed session items may be heard at any time during the meeting.

23. **CONFERENCE WITH LEGAL COUNSEL – EXISTING LITIGATION (Gov. Code, §54956.9) PURSUANT TO GOVERNMENT CODE SECTION 54956.9, SUBDIVISION (d), PARAGRAPH (1): NAME OF CASE**: City of Oxnard v. Fox Canyon Groundwater Management Agency, Los Angeles County Superior Court Case No. 20STCP00929

24. **CONFERENCE WITH LEGAL COUNSEL – EXISTING LITIGATION (Gov. Code, §54956.9) PURSUANT TO GOVERNMENT CODE SECTION 54956.9, SUBDIVISION (d), PARAGRAPH (1): NAME OF CASE:** Las Posas Valley Water Rights Coalition v. Fox Canyon Groundwater Management Agency, Santa Barbara County Superior Court Case No. VENCI0059700

25. **CONFERENCE WITH LEGAL COUNSEL – EXISTING LITIGATION (Gov. Code, §54956.9) PURSUANT TO GOVERNMENT CODE SECTION 54956.9, SUBDIVISION (d), PARAGRAPH (1): NAME OF CASE:** OPV Coalition et al v. Fox Canyon Groundwater Management Agency, Santa Barbara County Superior Court Case No. VENCI00555357

26. **Adjourn Board Meeting.**

STANDING NOTICES

The FCGMA Board strives to conduct accessible, orderly, and fair meetings where everyone can be heard on the issues. The Board Chair will conduct the meeting and establish appropriate rules and time limitations for each item. The Board can only act on items designated as Action Items. Action items on the agenda are staff proposals and may be modified by the Board as a result of public comment or Board member input.

Public Comment: Public comment is the opportunity for members of the public to participate in meetings by addressing the Fox Canyon Board of Directors in connection with one or more agenda or non-agenda items.

The following options allow for public participation:

1. Join the Zoom Meeting as an Attendee:
https://us02web.zoom.us/j/83866690007?pwd=gM91MwihxFa3LIpZuYB50dvADCnKzY.1
Webinar ID: 838 6669 0007
Passcode: 649514
With this option you will be able to raise your hand, and the Clerk of the Board will give you speaking abilities to make a public comment. If you experience technical difficulties during Zoom meeting attendance that impact your ability to hear or see meeting proceedings, please contact the host via chat, or raise your hand for Q&A inside the Zoom Client. If you are unable to contact the host via the Zoom Client's chat or Q&A features, please call (805) 654-2014 and report the issue, then consider submitting written comment according to option 4, below. Should the technical issue persist on Zoom, please consider option 2, below.
2. Observe the Board of Directors meeting streaming live by navigating to the "Current and Upcoming Meetings" section of our website and clicking on the video icon button next to the meeting listing at: https://fcgma.org/board-agendas-broadcasts-minutes/
3. Call in to listen to the meeting:
+1 669 444 9171 US
+1 669 900 6833 US (San Jose)
+1 408 638 0968 US (San Jose)
+1 253 215 8782 US (Tacoma)
+1 346 248 7799 US (Houston)
+1 719 359 4580 US
+1 253 205 0468 US
+1 689 278 1000 US
+1 301 715 8592 US (Washington DC)
Webinar ID: 838 6669 0007
Passcode: 649514

Options 2 and 3 will not allow you to make direct speaking comments. If you wish to make a written comment, please follow the steps below.

4. If you wish to make a written comment on a specific agenda item, please submit your comment via email by 5:00 p.m. on the Monday prior to the Board regular meeting. Please submit your comment to the Clerk of the Board at FCGMA@ventura.org. Please indicate in the subject line of your email the agenda item number (e.g., Item 9). Your comment will be read by the Board of Directors and placed into the record.
5. If you are watching the live stream of the Board meeting and would like to make either a general public comment (Item 5) for items not on the day's agenda or to comment on a specific agenda item as it is being heard, please submit your comment via email to the Clerk

of the Board at FCGMA@ventura.org. Please indicate in the email subject line, the agenda item number (e.g., Item No. 9). Every effort will be made to read your comment into the record, but some comments may not be read due to time limitations. Comments received after an agenda item will be made part of the record if received prior to the end of the meeting.

Administrative Record: Material presented as part of testimony will be made part of the Agency's record, and 10 copies should be left with the Board Clerk. This includes any memos, presentations, maps, etc. If possible, in advance of the meeting, email a PDF of your materials to FCGMA@ventura.org.

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ADA Accommodations: Persons who require accommodation for any audio, visual, or other disability in order to review an agenda or to participate in the Board of Directors meeting per the Americans with Disabilities Act (ADA), may request such accommodation in writing addressed to the Clerk of the FCGMA Board, 800 So. Victoria Avenue, Location #1610, Ventura, CA 93009-1610, via emailing FCGMA@ventura.org or via telephone by calling (805) 654-2014. Any such request should be made at least 48 hours prior to the meeting so staff can make the necessary arrangements.

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Availability of Complete Agenda Package: A copy of the complete agenda package is available for examination at the FCGMA office during regular working hours (8:00 a.m. to 5:00 p.m. Monday through Friday) beginning five days before the regular Board meeting. Agenda packet contents are also posted on the FCGMA website as soon as possible and left there for archival retrieval in case reference is needed on previously considered matters. Questions about specific items on the agenda should be directed to the Agency's Executive Officer.

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Continuance of Items: The Board will endeavor to consider all matters listed on this agenda. However, time may not allow the Board to hear all matters listed. Matters not heard at this meeting may be carried over to the next Board meeting or to a future Board meeting. Participating individuals or parties will be notified of the rescheduling of their item prior to the meeting. Please contact the Agency Clerk to find out about rescheduled items.

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The Ralph M. Brown Act: It is the intent of the law that the actions of this Board be taken openly and that their deliberations be conducted openly. Read about the Ralph M. Brown Act via this link: https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?chapter=9.&division=2.&lawCode=GOV&part=1.&title=5.

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Agency Information and Updates: Our website address is https://fcgma.org/. Information available online includes the Board's meeting schedule, a list of the Board members and staff, general information, and various Agency forms. If you would like to be added to our email notification list, or to speak to a staff member, please contact the FCGMA Clerk of the Board at (805) 654-2014 or via email at FCGMA@ventura.org.

FOX CANYON
GROUNDWATER MANAGEMENT AGENCY

A STATE OF CALIFORNIA WATER AGENCY

February 12, 2025

Board of Directors
Fox Canyon Groundwater Management Agency
800 South Victoria Avenue
Ventura, CA 93009-1600

SUBJECT: Executive Officer's Report – *(Returning Item)*

RECOMMENDATION: Receive and file this informational report.

AGENCY EXECUTIVE OFFICER RECRUITMENT:

When appointed Interim Executive Officer, I made it clear I do not intend to be your full-time Executive Officer, primarily because I knew I would not have the longevity in the position to best serve your Board and the Agency.

I will be retiring from the County and the Agency on April 25, 2025. This last year as your Interim Executive Officer has been unlike any other in my career. Not just in the work I've been doing but the good people I've been working with. I appreciate the support your Board has given and look forward to seeing the work everyone will be doing in the future. My last Fox Canyon Board meeting will be April 22nd. Until then, I will be working with your Board and our FCGMA team to assure as smooth a succession as possible.

CANDIDATE RECRUITMENT AND SELECTION

The request for qualifications presented to your Board on January 22, 2025, was solicited to professional recruitment firms on Monday, January 27 with responses due Monday, February 3, 2025. Three responses were received. Interviews are planned with each of the responsive recruitment firms; the top firm will be selected and contracted shortly thereafter.

Stakeholder engagement is encouraged to ensure collaboration in the candidate selection. Per the Executive Committee's recommendation, a selection panel will be formed consisting of representatives from the Las Posas, Oxnard, and Pleasant Valley Basins, and it will include a range of stakeholders including agriculture, municipal and local water agency representatives as well as FCGMA and County Executive Office (CEO) HR.

Stakeholders are invited to suggest names for the selection panel. Please email your nominations and their contact information to FCGMA@ventura.org with "EO Selection Panel Nominee" in the email subject line at your earliest convenience.

FORMAL POSITION CREATION

Position description of duties, qualifications and compensation for the Agency Executive Officer position[1] was approved by your Board January 22, 2025. The next step is for the County Board of Supervisors to approve the creation of the position within the County payroll system. This is expected to be discussed for approval on their March 18th Agenda.

MONTHLY BUDGET TO ACTUAL ACCOUNTING:

FCGMA

The FCGMA monthly budget report for January 2025 is listed in the Consent Agenda.

LPV WATERMASTER

The LPV Watermaster monthly budget to actual accounting report for January 2025 is listed in the Consent Agenda.

LPV WATERMASTER ASSESSMENTS:

2024-1 BASIN ASSESSMENT UPDATE

On September 25, 2024, the Watermaster Board adopted a Basin Assessment for Las Posas Valley Basin for Water Year (WY) 2024 of $64.58 to be invoiced quarterly at $16.145. The first quarterly Basin Assessment (BA) invoice payments were due November 1, 2024. Payments not received within a month of the due date are considered delinquent and shall bear interest at the current real property tax delinquency rate for Ventura County.

Two notices of delinquency were sent to delinquent Water Management Identifications (WMIDs) on December 11 and December 21, 2024. As of February 06, 2025, $28,027.83 is delinquent from 14 WMIDs, $24,943.76 in BA invoice payments and $3, 084.07 in interest charges. A list of delinquent 2024-1 BA WMIDs is available on the Watermaster website at: https://fcgma.org/annual-allocations-wy-2024/[2].

2023-1 DELINQUENT BASIN ASSESSMENTS

Staff have processed $1,287,217.90 from LPV Basin Assessments for WY 2023. Delinquent payments for WY2023 as of February 06, 2025, amount to $23,242.72 from 10 WMIDs. A list of delinquent 2023-1 BA WMIDs is available on the Watermaster website at: https://fcgma.org/annual-allocations-wy-2023/[3]. Staff are taking the next steps consistent with enforcement authorities granted under the Judgment to collect delinquent amounts.

MEETINGS:

FEBRUARY REGULAR BOARD MEETING

Due to availability in February, staff recommends cancelling the Board Regular meeting scheduled for February 26, 2025.

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[1] Link to Position Description: https://ventura.primegov.com/portal/viewer?id=371770&type=2

[2] Direct link to 24-1 BA Delinquency List: https://s42135.pcdn.co/wp-content/uploads/2025/02/LPV-Basin-Assess-Delinq-Report-2024-1_2025-02-06.pdf

[3] Direct link to 23-1 BA Delinquency List: https://s42135.pcdn.co/wp-content/uploads/2025/02/WY2023-1_LPV-Basin-Assessment_Delinquency-Invoice_Status_02-09-25.pdf

For more information about Board and Committee meetings, please see the list of Scheduled Meetings for Calendar Year 2025 (attached as Item 6A).

CONCLUSION:
This letter has been reviewed by Agency Counsel. If you have any questions, please call me at (805) 654-3942.

Sincerely,

Arne Anselm
Interim Executive Officer

Attachment:
Item 6A – Scheduled Meetings for Calendar Year 2025

Fox Canyon Groundwater Management Agency (FCGMA)
Scheduled Meetings for Calendar Year 2025

Board Regular Meetings
Fourth Wednesday, Monthly

Date	Start Time	Room
Wednesday, January 22	12:30 PM	BOS
Wednesday, February 26	12:30 PM	BOS
Wednesday, March 26	12:30 PM	BOS
Wednesday, April 23	12:30 PM	BOS
Wednesday, May 28	12:30 PM	BOS
Wednesday, June 25	12:30 PM	BOS
Wednesday, July 23	12:30 PM	BOS
Wednesday, August 27	12:30 PM	BOS
Wednesday, September 24	12:30 PM	BOS
Wednesday, October 22	12:30 PM	BOS
Wednesday, December 10	12:30 PM	BOS

Board Special Meetings
Typically, Second Friday, Monthly, As Needed

Wednesday, February 12	12:30 PM	BOS
Friday, April 11	12:30 PM	LPAR
Friday, May 9	12:30 PM	LPAR
Friday, June 13	12:30 PM	MPR
Friday, July 11	12:30 PM	LPAR
Friday, August 8	12:30 PM	LPAR
Friday, September 12	12:30 PM	MPR
Friday, October 10	12:30 PM	LPAR
Friday, November 14	12:30 PM	MPR

Executive Committee Meetings
As Needed

Thursday, January 9	1:30 PM	LPAR
Monday, March 17	10:00 AM	LPAR
Thursday, May 1	1:30 PM	LPAR
Thursday, July 10	1:30 PM	LPAR
Thursday, September 4	1:30 PM	MPR
Thursday, November 6	1:30 PM	MPR

Fiscal Committee Meetings
As Needed

Tuesday, February 18	10:00 AM	MPR
Tuesday, March 18	10:00 AM	LPAR
Tuesday, April 15	10:00 AM	MPR
Tuesday, May 6	10:00 AM	MPR
Tuesday, June 17	10:00 AM	MPR
Tuesday, July 15	10:00 AM	MPR
Tuesday, August 19	10:00 AM	MPR

Operations Committee Meetings
As Needed

~~Monday, February 3~~	~~1:30 PM~~	~~MPR~~
Monday, April 7	12:30 PM	MPR
Monday, June 2	1:30 PM	MPR
Monday, August 4	1:30 PM	MPR
Monday, October 6	1:30 PM	MPR

ABOUT SCHEDULED MEETINGS

- All meetings will be held at the Ventura County Government Center, Administration Building, at 800 South Victoria Avenue, Ventura, California, unless otherwise noted.
- **Special meetings and committee meetings are subject to necessity and may be rescheduled or may not be noticed to occur.**
- When a meeting is officially noticed per the Ralph M. Brown Act, it is confirmed to occur.
- To stay up to date, contact FCGMA@ventura.org to subscribe to our notification list.
- Alterations of the time or room are possible, so please check for facility or start time changes each month.
- Meeting schedules are online at https://fcgma.org/events/.

Key	
"As Needed"	Subject to Necessity
Row is Gray	Already Occurred
~~Strikethrough~~	Meeting Not Held
BOS	Board of Supervisors Hearing Room
LPAR	Lower Plaza Assembly Room
MPR	Multi-Purpose Room

February 12, 2025

Board of Directors
Fox Canyon Groundwater Management Agency
800 South Victoria Avenue
Ventura, CA 93009-1600

SUBJECT: Approval of Revised First Periodic Evaluation of the Groundwater Sustainability Plan for the Oxnard Subbasin – *(New Item)*

RECOMMENDATIONS: (1) Approve the revised First Periodic Evaluation of the Groundwater Sustainability Plan (GSP) for the Oxnard Subbasin and **(2)** direct Agency staff to submit it to the California Department of Water Resources (DWR).

DISCUSSION:
At the December 13, 2024, meeting, your Board considered for approval the 5-Year Periodic Evaluations of the Groundwater Sustainability Plans for the Las Posas Valley, Oxnard, and Pleasant Valley Basins. Your Board approved the evaluations for the Las Posas Valley Basin and the Oxnard Subbasin as prepared by Agency staff without amendment or change, and subsequently approved the evaluation for the Pleasant Valley Basin with changes approved by your Board. The specified changes are shown in Exhibit 8A, attached hereto.

After your Board adopted the evaluations, Agency staff learned that your Board intended its recommended changes to be made to the evaluations for the Pleasant Valley Basin and the Oxnard Subbasin. For reference, please see a redline copy of the December 13, 2024, FCGMA Board meeting minutes (attached as Exhibit 9B), which were approved as amended during your Board's January 22, 2025, meeting[1]. As such, the Periodic Evaluation of the Groundwater Sustainability Plan for the Oxnard Subbasin has been revised accordingly (attached as Exhibit 8C).

CONCLUSION:
It is recommended that your Board approve and include the Board's recommended

[1] Review the January 22, 2025, Board meeting recording at https://ventura.primegov.com/Portal/Meeting?meetingTemplateId=19853.

changes in the Revised First Periodic Evaluation of the Groundwater Sustainability Plan for the Oxnard Subbasin and to direct staff to submit the amended evaluation to DWR.

This letter has been reviewed by Agency Counsel. If you have any questions, please call me at (805) 654-3952

Sincerely,

Robert Hampson
Hydrologist

Attachments:

Exhibit 8A - Motion to Approve and Authorize Staff to Submit the Five-Year Periodic Evaluations of the Groundwater Sustainability Plans for the Pleasant Valley Basin and Oxnard Subbasin, as authored by Director Tony Trembley

Exhibit 8B - December 13, 2024, Board Meeting Minutes, approved as amended

Exhibit 8C - Revised First Periodic Evaluation of the Groundwater Sustainability Plan for the Oxnard Subbasin

Motion to Approve and Authorize Staff to Submit the Five-year Periodic Evaluations of the Groundwater Sustainability Plans for the Pleasant Valley Basin and Oxnard Subbasin as amended by the below changes:

Add the below paragraph in the first part of the Executive Summary for the Five-Year Periodic Evaluation for the Pleasant Valley Basin, as well as the Five-Year Periodic Evaluation for the Oxnard Subbasin:

This first Periodic Evaluation of the GSP also includes updated groundwater modeling and new additional preliminary groundwater modeling simulations of future groundwater usage scenarios and sustainable yields. This work is ongoing and subject to further stakeholder engagement, which may result in revisions to the information presented herein. Stakeholders have requested more comprehensive analysis of simulation results. Some stakeholders, while acknowledging the PVB and Oxnard Subbasins are interconnected, have questioned statements that pumping in the PVB impacts seawater intrusion in the Oxnard Subbasin, so this issue will be further evaluated as part of the ongoing GSP evaluations. Stakeholders are also interested in a more comprehensive analysis of the groundwater model simulations to assess potential unintended consequences. For example, some of the preliminary simulation results show that certain groundwater usage scenarios result in losses of recharge from precipitation and applied water, shifts in flows between groundwater basins (that negatively impacts PVB and Oxnard Subbasin water supplies), significant losses of stream recharge, and significant increases in evapotranspiration and drain flows, which results in a waste of water resources. The FCGMA Board is committed to further stakeholder engagement to address these concerns and continue a robust evaluation of the GSP in order to ultimately adopt amendments to the GSP that provide benefits to the community and environment at reasonable costs.

Delete the 3rd paragraph of the North Pleasant Valley Management Area section of Section 2.2.4.1 of the Five-Year Periodic Evaluation for the Pleasant Valley Basin, and replace it with the following:

The City of Camarillo, in coordination with FCGMA, is in the process of developing a revised Monitoring and Contingency Plan (MCP) to establish groundwater elevation of nearby project wells as the primary measure of assessing potential seawater intrusion impacts. Monitoring data indicate that groundwater elevation at well 02N20W19M05S has not dropped below -11.5 ft. msl. The current GSP minimum threshold groundwater elevation at well 02N20W19M05S of -135 ft msl is designed to accommodate the operation of the NPV Groundwater Desalter Project; however the FCGMA Resolution 2016-04 and accompanying MCP was established primarily to address water quality concerns in the NPVMA with thresholds established to reduce groundwater levels prior to when brackish water entered the basin, then allowing the basin to recover . The operation of the Desalter may bring groundwater levels in the project area below the GSP minimum threshold at well 02N20W19M05S temporarily while addressing groundwater quality concerns. FCGMA is committed to adaptive management and encouraging beneficial projects that address water quality degradation in the basin and enable beneficial uses of local water supplies. Groundwater level and quality conditions in the NPVMA will continue to be monitored in coordination with the City of Camarillo through implementation of the NPV Groundwater Desalter project.

FCGMA staff is directed to submit the City of Camarillo's and Camrosa Water District's comments on the draft Periodic Evaluation to the Department of Water Resources as attachments to the final Periodic Evaluation with the following explanation statement:

The eastern portion of the Pleasant Valley basin has a complex relationship with inflows from neighboring basins, both in terms of water quantity and water quality. For example, the City of Camarillo's desalter serves not only the City's water supply needs, but also addresses a water quality concern identified by the Los Angeles Regional Water Quality Control Board. FCGMA continues to work with the City and Camrosa Water District to incorporate these concerns into the groundwater sustainability plan (GSP) and this Periodic Evaluation should not be understood to prejudice further analysis of those issues in the eastern Pleasant Valley basin as the GSP is updated.

FOX CANYON GROUNDWATER MANAGEMENT AGENCY

A STATE OF CALIFORNIA WATER AGENCY

MINUTES

Minutes of the Fox Canyon Groundwater Management Agency's (FCGMA) Board of Directors hybrid special meeting held at 1:30 P.M. on Friday, December 13, 2024, via Zoom and in-person in the Lower Plaza Assembly Room at the Ventura County Government Center, Hall of Administration, Lower Plaza Level at 800 South Victoria Avenue, Ventura, California.

1. Call to Order — 1:32 P.M.

Chair Eugene F. West called the meeting to order.

2. Pledge of Allegiance

Chair West led the Pledge of Allegiance.

3. Directors Present

Chair Eugene F. West
Director Kelly Long
Director Tony Trembley
Director Michael Craviotto
Alternate Director Bert Perello
Alternate Director David Borchard

Director Lynn Maulhardt was absent with no Alternate Director present.

Agency Staff Present

Jason Canger, Assistant County Counsel
Arne Anselm, Interim Executive Officer
Farai Kaseke, Assistant Groundwater Manager
Elka Weber, Clerk of the Board
Robert Hampson, Groundwater Specialist
Briana Barajas, Water Resources Specialist

4. Agenda Review — 1:33 P.M.

Interim Executive Officer Arne Anselm proposed that the Board hear Item 18 as the first item of the regular agenda, after hearing consent. Mr. Anselm also suggested that the

Board hear Items 19 and 20 together but have comments and motions separately. The Board agreed with no objections.

5. Public Comments 1:33 P.M.

No public comment was given.

6. Executive Officer's Comments 1:34 P.M.

Interim Executive Officer Arne Anselm referred the Board to the administrative report attached to Item 6 as an exhibit. Mr. Anselm then introduced Water Resources Specialist Briana Barajas and welcomed her to the Agency as a new hire. Mr. Anselm noted that a Management Assistant will be onboarded in January 2025.

7. Board Member Comments 1:35 P.M.

Director Long thanked all water districts for working together and making sure we had the water needed to fight the Mountain Fire. Director Long then encouraged our stakeholders to advocate for more State water than the 5% that was announced recently.

CONSENT AGENDA 1:35 P.M.

8. Approval of Minutes of the October 23, 2024, Board Regular Meeting.

CONSENT AGENDA – FCGMA Items

9. FCGMA Budget to Actual Report for October 2024

10. Approve and Authorize a Purchase Order in the Amount of $33,551.88 with In-situ Inc. for Data Collection Equipment (Transducers) for the Agency's New Monitor Wells

CONSENT AGENDA – LPV Watermaster Items

11. LPV Watermaster Budget to Actual Report for October 2024

12. Appointment of Arturo Aseo, Replacement Commercial Constituency Group Representative to the Las Posas Valley Basin Policy Advisory Committee

CONSENT AGENDA – Correspondence Items

13. Receive and file Correspondence from Melissa A. Jones of Stoel Rives LLP, regarding the firm's increased rates, dated November 21, 2024.

14. Receive and file Correspondence from James Graham, President of the Pleasant Valley Mutual Water Company (PVMWC), regarding shareholder nominations for PVMWC Director elections, dated November 18, 2024.

Chair West asked for a motion to approve and adopt the Consent Agenda, Items 8 through 14, as presented. Director Long so moved. Director Trembley seconded the motion. The motion passed with all in favor at 1:35 P.M.

REGULAR AGENDA - FCGMA Items 1:35 P.M.

15. Agency Board Meeting, Special Meeting, and Committee Meeting Schedules for Calendar Year 2025 1:39 P.M.

Item 15 was heard at 1:39 P.M. after Item 18, per the Board's decision during Agenda Review.

Interim Executive Officer Arne Anselm presented the Item and noted the proposed schedules for calendar year 2025 for the Board of Directors and the Executive, Fiscal, and Operations Committees. Mr. Anselm noted that the schedule of special meetings, should they be needed, has shifted to the second Wednesday monthly, due to conference room availability.

Regarding Committee meetings, Mr. Anselm noted that their meeting schedules have been updated to include extra reservations for meetings as they are needed, due to difficulties in scheduling and logistics. Mr. Anselm stated that it is easier to cancel a reservation than it is to schedule an entirely new special meeting during the year. Special meetings and Committee meetings are held on an as needed basis and will be held if they are officially noticed per the Ralph m. Brown Act.

Mr. Anselm noted that, in calendar year 2025, Agency staff hopes the Executive Committee focus is on reviewing the Fiscal Year 2024-2025 Annual Work Plans for both the Agency and LPV Watermaster, then providing guidance on updating the plans for the coming fiscal year; the Executive Committee also hopes to focus on staffing, policy development, especially working on an initial outline of a policy manual for the LPV Watermaster, and developing a 5-Year Strategic Plan for the Agency. The Fiscal Committee aims its 2025 focus on fiscal policy, FY 24/25 Work Plan and resource assignment review, a review of Agency fees, and development of the FY 2025-2026 draft budgets, Work Plan and, Proposed Budget Report. He noted that the start time for Fiscal Committee meetings may shift to 10 AM for all meetings, and that the May meeting is likely to be rescheduled to May 6 due to availability. Mr. Anselm then noted that staff hopes the Operations Committee plans to focus on Fire Fighting Relief Planning related to the Mountain Fire, reviewing and discussing improvements and consolidations for the Meter Ordinance, and a series of project reviews and evaluations before identifying further project details, modeling information in future GSP amendment work, and developing annual project presentations to the Board at large. Mr. Anselm noted that these focus areas are recommended in order to hone and improve the Agency's basin management.

Director Trembley noted that he has shared feedback regarding his availability with the Chair and the Clerk, and the Clerk agreed that follow-up on this information is underway. Director Trembley noted that he will not be present for the February Board meeting, and has asked his Alternate, Bert Perello, to attend in his place. Director Long expressed preference for special meetings to be scheduled on Fridays, she noted that she will review the schedules as presented with her staff and the Clerk agreed to follow up with her office as needed.

Chair West asked for a motion to approve and adopt the meeting schedules as presented, with needed amendments that may arise during the calendar year. Director Craviotto so moved. Director Trembley seconded the motion. The motion passed with all in favor at 1:48 P.M.

16. Rescind Resolution 2005-08 and Adopt Resolution 2024-06 Defining the Function of the Position of Agency Executive Officer 1:48 P.M.

Interim Executive Officer Arne Anselm presented the Item and reminded the Board that the Item was deferred from a previous agenda. He provided a brief overview of the Executive Officer, noting that the position was first defined in Ordinance No. 8.1 on July 27, 2005, and that the position of Executive Officer was delegated the administrative authority required to implement Agency executive functions with the adoption of Resolution 2005-08 on September 28, 2005. He noted that Resolution 2005-08 also carries designates the Director of the Ventura County Watershed Protection District as the Agency's Executive Officer, a designation that the Executive Committee recommended eliminating during its October 14, 2024, meeting.

Mr. Anselm stated that Resolution 2024-06 retains the delegated administrative authority needed for the function of the position of the Agency Executive Officer, yet it rescinds Resolution 2005-08 and its designation that the Director of Ventura County Public Works Agency Watershed Protection also serve as Executive Officer to the FCGMA. In addition, Mr. Anselm noted that Resolution 2024-06 includes the assertion that the Executive Officer shall be subject to annual performance evaluations by the Board.

Public comment was given by Bert Perello, FCGMA Alternate Director and City of Oxnard Councilmember.

Mr. Anselm clarified that this motion is by the FCGMA Board and refers to our Board only.

Chair West asked for a motion to approve and adopt Resolution 2024-06. Director Long so moved. Director Craviotto seconded the motion. The motion passed with all in favor at 1:51 P.M.

17. Agency Executive Officer Position Duties and Qualifications 1:51 P.M.

Regarding the Item, Interim Executive Officer Arne Anselm reminded the Board that the FY 2024-25 budget includes funding for a full time Executive Officer, and that this Agency has never directly recruited or hired an Executive Officer. One of the first steps towards hiring an Executive Officer would be reaching an agreement on the position's qualifications as described in a job description.

To provide further context on the Item, Chair West reminded the Board that the draft job description, attached as an exhibit under Item 17, has been drafted by Sevet Johnson and the office of the Ventura County Chief Executive Officer (CEO). Chair West noted that he has met with the office of the Ventura County CEO multiple times over the past year to discuss the position and its qualifications.

Chair West stated that the intent of this Item is to discuss the draft job description and possible amendments or inclusions that the Board should consider before publishing to recruit candidates. He added that a salary range is currently missing from the draft job description, and if it is this Board's pleasure for the Executive Committee will need to discuss what salary range would be appropriate for the role to publish as part of that recruitment effort.

Director Long noted that an "established date" should also be added to the document to communicate the date of adoption, once the draft job description is adopted. She noted that this draft job description is an outline of minimum required qualifications and experience and does not define what the role falls within or under structurally. Chair West agreed and said that the job description, once adopted, will be used as a recruiting tool.

Director Craviotto asked after a timeline for recruitment and what the next steps may be. Chair West noted that the Executive Committee would like to discuss the Board's options for recruitment once the job description and salary range are established, whether they will use the County's HR department to recruit the role or go with an independent recruiting agency, or both. He noted that whichever entity oversees recruiting will inform the timeline of recruitment.

Chair West stated that his preference would be to use an independent agency that specializes in filling government positions of this type, and that the CEO's office has recommended several firms to consider. He added that a recommendation with respect to the salary range is not included today because that information is still pending from the County's HR department.

Mr. Anselm noted that an additional next step for the Board to consider is developing marketing materials that show why this position and Agency are so unique, which would provide more context for its challenges and opportunities.

Public comment was given by Dr. Sevet Johnson, CEO, County of Ventura. Dr. Johnson noted that the County is working behind the scenes with multiple departments to resolve some compaction regarding the potential salary range for this role and added that the County has to look at this issue equitably, because the Executive Officer position would be a County employee, falling under the classifications and structure of County employment. Chair West stated that it is his understanding that because this Agency will be paying the salary of the role, this Agency gets to set the payment schedule independent of the County's salary schedule. Dr. Johnson stated that she understands the Chair's assertion but maintains that the County is currently working through some nuances related to this issue.

Director Craviotto asked whether the Executive Officer position could be staffed on a contract basis. Chair West responded that the Board would have an opportunity to discuss that topic and its complications at a later date. He clarified that while the Agency's enabling legislation gives the Board authority to contract with entities of their choice, County employees currently staff the FCGMA and cannot be supervised or directed by someone who is not a County employee. Director Long added that the topic is part of a larger issue because it relates to how the Agency was created and can be staffed according to its legislative wording and counsel interpretations. She noted that this job description and salary range are a few pieces of a larger puzzle.

Director Craviotto responded that he appreciates the context and how this is part of a larger conversation, and he commented that staffing the Executive Officer role via contract would hypothetically enable the Board to offer a higher salary that is more competitive.

Director Trembley quoted the draft job description under the "Distinguishing Characteristics" section: "This single position classification is fully accountable to the Board of Directors for the management of the Fox Canyon Groundwater Management Agency. This position is exempt from the Civil Service System." Director Trembley noted that however the space that person occupies, he or she will be directly accountable to this Board.

Public comment was given by David Borchard, Farmer and FCGMA Alternate Director.

Chair West noted that the Fiscal Committee has been recommending midyear budget reports and monthly summaries so that midyear adjustments to the budget can be made as needed. Interim Executive Officer Arne Anselm noted that one such midyear adjustment the Board has made recently was to reduce the amount of the FY 2023-24 LPV Watermaster Basin Assessments.[1]

As this Item was presented for information and feedback only, no Board action was taken.

18. Resolution of Appreciation for David Borchard 1:35 P.M.

Item 18 was heard at the top of the Regular Agenda, at 1:35 P.M, per Board agreement.

Chair West presented the Item and introduced it as one he never hoped to have to present, as he anticipated he would be long gone before presenting such an item marking the exit of David Borchard as Director on our Board. Chair West thus honored David Borchard for his twenty years of service on the Board of Directors; he stated that there has been no one during his tenure that Chair West has enjoyed working with more. Chair West continued that, agree or disagree, David Borchard was always a calming voice during discussions, respectful of the process, and the public, and the other Board members; he'll be missed by this Board and our stakeholders.

Chair West then asked for Board comment. Director Long thanked Mr. Borchard and his family for his commitment to the Board and noted that Mr. Borchard's passion for water and dedication to raising awareness and having tough conversations about the Agency's work has been a true service to our community. Director Trembley agreed completely by offering the City of Camarillo City Council's trademark agreement phrase, "Ditto." He also extended his thanks to Mr. Borchard.

[1] See Resolution 2024-04 at https://s42135.pcdn.co/wp-content/uploads/2024/07/Resolution-2024-04.pdf

Director Craviotto noted that, when he was discussing joining the Board as farming representative with the Farm Bureau, the CEO Maureen Macguire of the Farm Bureau said that the best part of this job is hanging out with Dave Borchard. Director Craviotto noted that this is a testimony to the person Dave Borchard is in our community, that it shows what an approachable, knowledgeable figure of service he is and has been, and how deserving he is of our gratitude.

Chair West asked for a motion to adopt Resolution 2024-07, honoring David Borchard for his years of esteemed service to the Board. Director Trembley so moved. Director Craviotto seconded the motion. With all in favor, the motion passed at 1:39 P.M.

The Board then returned to the Agenda order as presented, and the Chair announced the Board's intention to hear Item 15.

19. Approve and Authorize Staff to Submit the Five-Year Periodic Evaluations of the Groundwater Sustainability Plans for the Pleasant Valley Basin and Oxnard Subbasin 2:07 P.M.

Item 19 was heard with Item 20; discussion on Item 19 began at 2:07 P.M. Redline versions showing revisions and final revised drafts of Periodic Evaluations for the Oxnard Subbasin, the Pleasant Valley Basin, and the Las Posas Valley Basin are available at https://fcgma.org/gsp-evals-draft-comments/.

Interim Executive Officer Arne Anselm introduced the Item to the Board, alongside Agency Hydrologist Robert Hampson and Dr. Trevor Jones of Dudek, the Agency's consultant engaged with the first periodic evaluation of the Agency's implementation of the Groundwater Sustainability Plans (GSPs) for the basins.

Mr. Anselm noted that the Periodic Evaluation is required by the California Department of Water Resources (DWR) to be conducted at a minimum of every five years, and that the project is an assessment of GSP implementation for that evaluation cycle, including analyses of the status of groundwater conditions, progress on meeting interim milestones and measurable objectives, progress GSP elements such as projects and management actions and their quantified cumulative benefits, including any unforeseen challenges encountered during the development or implementation of certain projects and management actions.

To remind the audience, Mr. Anselm noted that a GSP Amendment differs from a Periodic Evaluation, as it is at the discretion of the GSA, not the DWR, and is warranted when a significant or material change to GSP implementation occurs in either measurable objectives, minimum thresholds, or management actions. GSP Amendments are not needed for new representative monitoring sites or new sustainable management criteria for new monitoring sites that are utilizing a consistent approach. Mr. Hampson provided an overview of the development process for the Periodic Evaluations, including stakeholder engagement. He thanked the stakeholders for their detailed and involved feedback and noted that the stakeholders did not recommend amending thresholds for sustainable management criteria. He noted that the revised Periodic Evaluations do not recommend an amendment as a direct result of stakeholder feedback.

During his proposal, Dr. Jones agreed that the Periodic Evaluations do not warrant amending the GSPs as GSP implementation is on track to meet the sustainability goal set forth in the GSP for each basin. The revised draft Periodic Evaluations were improved by stakeholder feedback, and several primary revisions include correcting errors and typos, expanding discussion narratives for additional clarity, re-evaluating modeling to address double counting of recycled water, removing recommendations to revise the minimum threshold and measurable objective groundwater levels, and removing recommendations to amend the Oxnard, Pleasant Valley, and Las Posas Valley GSPs.

Dr. Jones added that while GSP Amendments are not recommended at this time; the need to amend the GSPs should be evaluated over the next five years as projects are implemented and additional data is collected. Improved coordination and installation of additional dedicated monitoring wells would benefit from the understanding of how GSP implementation impacts the basin over the upcoming five year period.

Dr. Jones noted that the development of the Periodic Evaluations has brought an improved understanding of GSP implementation in each basin; the process has expanded the suite of projects relative to the GSP, it has improved the understanding of project and management action impacts on the sustainable yield and simulated seawater intrusion, improvements to the estimates of sustainable yield, and revisions to the monitoring network. He noted that the GSPs and Periodic Evaluations both include simulations that minimize seawater intrusion, and that it is reasonable to recommend that minimum thresholds and measurable objects established in the GSPs are appropriate for the evaluation of progress towards sustainability over the next five years. As the Extraction Barrier and Brackish (EBB) Water Treatment Project progresses in its phased implementation over the next five years, minimum thresholds and measurable objectives will need to be evaluated and revised. Additional next steps recommended in GSP implementation include ongoing coordination with stakeholders and member Agencies, project implementation planning, collation of stakeholder recommendation into a longer-term planning document, continuing to prepare and submit annual report, and continuing to improve monitoring efforts.

At 2:33 P.M., Chair West asked for Board comments.

Director Long asked if we have received feedback from the stakeholders regarding the revised Periodic Evaluations, particularly with regards to removing the recommendation for an amendment. Dr. Jones responded that updated recommendations are consistent with stakeholder feedback but noted that no direct feedback regarding the final revised Periodic Evaluations has been received to date.

At 2:35 P.M., Chair West asked for public comment on the Periodic Evaluation for the Oxnard Subbasin.

Public Comment was given by:

Michael Wolfe, Director of Public Works for the City of Oxnard.

At 2:38 P.M., Chair West asked for a motion to approve and authorize staff to submit the 5-Year Periodic Evaluation of the Groundwater Sustainability Plan for the Oxnard Subbasin for submittal to the Department of Water Resources by January 13, 2025.

Director Trembley so moved. Director Long seconded the motion. Via roll call vote, the motion passed unanimously at 2:38 P.M.

At 2:38 P.M., Chair West asked for public comment on the Periodic Evaluation for the Pleasant Valley Basin.

Public Comment was given by:
Norman Huff, General Manager, Camrosa Water District
Terry Foreman, Director, Camrosa Water District
Dave Klotzle, Director of Public Works for the City of Camarillo.

On December 12, 2025, Camrosa Water District submitted comments on the final revised Periodic Evaluation for the Pleasant Valley Basin to be discussed during today's meeting. On December 13, 2025, the City of Camarillo submitted comments on the final revised Periodic Evaluation for the Pleasant Valley Basin to be discussed during today's meeting.

These comment letters have been distributed as handouts during the meeting and have been archived with Item 19 for the indexed December 13, 2024, Board Agenda, which was recirculated to the Board subsequent to adjournment. Review indexed materials at https://ventura.primegov.com/portal/item?id=273204.

Director Trembley stated that accuracy is of the upmost importance as the Periodic Evaluation ultimately reflects the Board's action. Director Trembley noted that the staff/consultant response to comments included in Appendix A of the updated draft Periodic Evaluation for Pleasant Valley Basin[2] inaccurately quote Resolution 2016-04, and he asked staff to follow up to confirm the validity of the response.[3]

The response was written with regards to Letter Number 6 from City of Camarillo. Excerpted from the final draft Periodic Evaluation for Pleasant Valley Basin:

> FCGMA recognizes the important role of the City of Camarillo's North Pleasant Valley Groundwater Desalter facility in removing and treating brackish groundwater that historically entered the basin from the adjacent Las Posas Valley Basin. However, Resolution 2016-04 recognized the potential that pumping from Desalter extraction wells could reduce groundwater levels such that seawater intrusion in the adjacent Oxnard Subbasin could be exacerbated, subsidence could

[2] See page 306 of the final draft at https://s42135.pcdn.co/wp-content/uploads/2024/11/PVB_Periodic_Evaluation_Updated-Draft_GSP_CLEAN.pdf
[3] Resolution 2016-04 and attached Monitoring and Contingency Plan: https://s42135.pcdn.co/wp-content/uploads/2024/12/Resolution-2016-04.pdf

be induced, or a significant and unreasonable loss of fresh groundwater in storage could occur. The Resolution included a Monitoring and Contingency Plan that included groundwater pumping reduction triggers based on measured static groundwater elevation in northern Pleasant Valley wells. The GSP evaluation is consistent with these findings. The GSP evaluation does not recommend changing the minimum threshold or measurable objective in the vicinity of the desalter facility.

Director Trembley circulated an amended motion he prepared for the Board to consider with regards to factoring in stakeholder feedback on the final draft Periodic Evaluation and to approve and authorize staff to submit the 5-Year Periodic Evaluation of the Groundwater Sustainability Plan for the Pleasant Valley Basin and Oxnard Subbasin for submittal to the Department of Water Resources by January 13, 2025.

Director Trembley's amended motion is reflected below in its entirety:

Motion to Approve and Authorize Staff to Submit the Five-year Periodic Evaluations of the Groundwater Sustainability Plans for the Pleasant Valley Basin and Oxnard Subbasin as amended by the below changes:

Add the below paragraph in the first part of the Executive Summary for the Five-Year Periodic Evaluation for the Pleasant Valley Basin, as well as the Five-Year Periodic Evaluation for the Oxnard Subbasin:

This first Periodic Evaluation of the GSP also includes updated groundwater modeling and new additional preliminary groundwater modeling simulations of future groundwater usage scenarios and sustainable yields. This work is ongoing and subject to further stakeholder engagement, which may result in revisions to the information presented herein. Stakeholders have requested more comprehensive analysis of simulation results. Some stakeholders, while acknowledging the PVB and Oxnard Subbasins are interconnected, have questioned statements that pumping in the PVB impacts seawater intrusion in the Oxnard Subbasin, so this issue will be further evaluated as part of the ongoing GSP evaluations. Stakeholders are also interested in a more comprehensive analysis of the groundwater model simulations to assess potential unintended consequences. For example, some of the preliminary simulation results show that certain groundwater usage scenarios result in losses of recharge from precipitation and applied water, shifts in flows between groundwater basins (that negatively impacts PVB and Oxnard Subbasin water supplies}, significant losses of stream recharge, and significant increases in evapotranspiration and drain flows, which results in a waste of water resources. The FCGMA Board is committed to further stakeholder engagement to address these concerns and continue a robust evaluation of the GSP in order to ultimately adopt amendments to the GSP that provide benefits to the community and environment at reasonable costs.

Delete the 3rd paragraph of the North Pleasant Valley Management Area section of Section 2.2.4.1 of the Five-Year Periodic Evaluation for the Pleasant Valley Basin, and replace it with the following:

The City of Camarillo, in coordination with FCGMA, is in the process of developing a revised Monitoring and Contingency Plan (MCP) to establish groundwater elevation of nearby project wells as the primary measure of assessing potential seawater intrusion impacts. Monitoring data indicate that groundwater elevation at well 02N20W19M05S has not dropped below -11.5 ft. msl. The current GSP minimum threshold groundwater elevation at well 02N20W19M05S of -135 ft msl is designed to accommodate the operation of the NPV Groundwater Desalter Project; however, the FCGMA Resolution 2016-04 and accompanying MCP was established primarily to address water quality concerns in the NPVMA with thresholds established to reduce groundwater levels prior to when brackish water entered the basin, then allowing the basin to recover. The operation of the Desalter may bring groundwater levels in the project area below the GSP minimum threshold at well 02N20W19M05S temporarily while addressing groundwater quality concerns. FCGMA is committed to adaptive management and encouraging beneficial projects that address water quality degradation in the basin and enable beneficial uses of local water supplies. Groundwater level and quality conditions in the NPVMA will continue to be monitored in coordination with the City of Camarillo through implementation of the NPV Groundwater Desalter project.

FCGMA staff is directed to submit the City of Camarillo's and Camrosa Water District's comments on the draft Periodic Evaluation to the Department of Water Resources as attachments to the final Periodic Evaluation with the following explanation statement:

The eastern portion of the Pleasant Valley basin has a complex relationship with inflows from neighboring basins, both in terms of water quantity and water quality. For example, the City of Camarillo's desalter serves not only the City's water supply needs, but also addresses a water quality concern identified by the Los Angeles Regional Water Quality Control Board. FCGMA continues to work with the City and Camrosa Water District to incorporate these concerns into the groundwater sustainability plan (GSP) and this Periodic Evaluation should not be understood to prejudice further analysis of those issues in the eastern Pleasant Valley basin as the GSP is updated.

~~As the Periodic Evaluation for the Oxnard Subbasin was approved and authorized by prior Board action at 2:38 P.M., Director Trembley's motion applies to the language of the Periodic Evaluation for the Pleasant Valley Basin.~~

At 3:06 P.M., Director Trembley moved to approve and authorize staff to submit the 5-Year Periodic Evaluations of the Groundwater Sustainability Plans for the Pleasant Valley Basin and for the Oxnard Subbasin, as amended, for submittal to the Department of Water Resources by January 13, 2025.

Director Long asked that Director Trembley's added correction regarding the Comment Response to Letter Number 6 from the City of Camarillo regarding a summary of Resolution 2016-04 (on page 15285-11 A-8) be included in his motion as amended, and Director Trembley agreed. At 3:13 P.M., Director Long seconded Director Trembley's motion as amended.

Director Craviotto stated that he preferred having more time to consider the amended motion. Director Trembley responded that the timeline has been compressed for all parties.

Additional public comment was given by Bert Perello, City of Oxnard Councilmember and FCGMA Alternate Director.

Chair West called for a roll call vote. At 3:16 P.M. the amended motion passed with three votes in favor. Director Craviotto voted against the motion.

REGULAR AGENDA – LPV Watermaster Items

20. Approve the Response Reports Prepared in Response to the Las Posas Valley Policy Advisory Committee and Technical Advisory Committee Recommendation Reports on the Final Draft Five-Year Evaluation of the Groundwater Sustainability Plan for the Las Posas Valley Basin; Approve and Authorize Staff to Submit to the Department of Water Resources the Final Draft Five-Year Periodic Evaluation of the Groundwater Sustainability Plan for the Las Posas Valley Basin 3:17 P.M.

Item 20 was heard with Item 19; discussion on Item 20 began at 3:17 P.M.

Chair West asked for Board comments. Director Craviotto emphasized the importance of a mechanism to collect lessons learned and to plan for future collaborations and suggested that such information be published, as it can be helpful with regard to planning for the next periodic evaluation. Director Craviotto noted that the PAC and TAC Recommendation Reports both address a main theme of data gaps and reporting that the Basin has, with regards to collecting data at a minimum number of sites. He asked for a plan to address and resolve these issues in the future.

After asking for public comment and hearing none, Chair West then asked for a motion to approve the Response Reports prepared by Agency staff and Dudek in response to the Las Posas Valley Policy Advisory Committee and Technical Advisory Committee Recommendation Reports on the draft 5-Year Periodic Evaluation of the LPV GSP, and to approve and authorize staff to submit the final draft 5-Year Periodic Evaluation of the Groundwater Sustainability Plans for the Las Posas Valley Basin to the Department of Water Resources by January 13, 2025.

At 3:21 P.M. Director Craviotto so moved. Director Trembley seconded the motion. Via roll call vote, the motion passed with all in favor.

Director Long asked if the Agency can begin planning the timeline for next steps regarding the issues surfaces today in future meetings in calendar year 2025. Interim Executive Officer Anselm agreed and noted that he intends to bring the topic to the Executive Committee to start planning the process.

CLOSED SESSION AGENDA 3:23 P.M.

Chair West asked for public comment regarding the two matters agendized in closed session. Hearing none, Chair West recessed into closed session at 3:23 P.M.

21. **CONFERENCE WITH LEGAL COUNSEL – EXISTING LITIGATION (Gov. Code, §54956.9) PURSUANT TO GOVERNMENT CODE SECTION 54956.9, SUBDIVISION (d), PARAGRAPH (1): NAME OF CASE:** Las Posas Valley Water Rights Coalition v. Fox Canyon Groundwater Management Agency, Santa Barbara County Superior Court Case No. VENCI0059700

22. **CONFERENCE WITH LEGAL COUNSEL – EXISTING LITIGATION (Gov. Code, §54956.9) PURSUANT TO GOVERNMENT CODE SECTION 54956.9, SUBDIVISION (d), PARAGRAPH (1): NAME OF CASE:** City of Oxnard v. Fox Canyon Groundwater Management Agency, Los Angeles County Superior Court Case No. 20STCP00929

Chair West reconvened the regular session at 4:35 P.M. and announced that there was reportable action taken in closed session regarding Item 22:

Agency Counsel Jason Canger stated that the Board has ratified the filing of a cross appeal in the appeal of City of Oxnard v. Fox Canyon Groundwater Management Agency, Los Angeles County Superior Court Case No. 20STCP00929.

23. **Adjournment** 4:35 P.M.

Chair West adjourned the meeting.

Submitted by:

Elka Weber
Clerk of the Board

Revised First Periodic Evaluation

Groundwater Sustainability Plan for the Oxnard Subbasin

JANUARY 2025

Prepared for:

FOX CANYON GROUNDWATER MANAGEMENT AGENCY
800 South Victoria Avenue
Ventura, California 93009-1610
Contact: Farai Kaseke, PhD, PH, PMP, CSM

Prepared by:

DUDEK
605 Third Street
Encinitas, California 92024

Signature Page

This First Periodic Evaluation of the Groundwater Sustainability Plan for the Oxnard Subbasin has been prepared under the direction of a professional geologist licensed in the State of California as required by the California Code of Regulations, Title 23 Section 354.12, consistent with professional standards of practice.

PROFESSIONAL GEOLOGIST
JILL L. WEINBERGER
No. 8940 Exp.
10/31/25
PG
STATE OF CALIFORNIA

Jill Weinberger
P.G. No. 8940

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TABLES

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APPENDIX

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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
AF	acre-feet
AFY	acre-feet per year
AMI	advanced metering infrastructure
ASR	Aquifer Storage and Recovery
AWPF	Advanced Water Purification Facility
bgs	below ground surface
CMWD	Calleguas Municipal Water District
CWD	Camrosa Water District
CWRF	Camrosa Water District Water Reclamation Facility
DWR	California Department of Water Resources
EBB	Extraction Barrier Brackish
EOPMA	East Oxnard Plain Management Area
FCA	Fox Canyon Aquifer
FCGMA	Fox Canyon Groundwater Management Agency
GCA	Grimes Canyon Aquifer
GDE	groundwater-dependent ecosystem
GREAT	Groundwater Recovery Enhancement and Treatment
GRRP	Recycled Water/Groundwater Replenishment Reuse Project
GSA	Groundwater Sustainability Agency
GSP	Groundwater Sustainability Plan
LAS	Lower Aquifer System
LPVB	Las Posas Valley Basin
mg/L	milligrams per liter
msl	mean sea level
NBVC	Naval Base Ventura County
NNP	No New Projects
PEIR	Program Environmental Impact Report
PFAS	polyfluoroalkyl substances
PTP	Pumping Trough Pipeline
PVB	Pleasant Valley Basin
PVP	Pleasant Valley Pipeline
PVCWD	Pleasant Valley County Water District
SGMA	Sustainable Groundwater Management Act
SMC	Sustainable Management Criteria
State Water	State Water Project water
Subbasin	Oxnard Subbasin
SWP	State Water Project
TDS	total dissolved solids
UAS	Upper Aquifer System
UWCD	United Water Conservation District

Acronym/Abbreviation	Definition
VCWPD	Ventura County Watershed Protection District
VRGWFM	Ventura Regional Groundwater Flow Model
WLPMA	West Las Posas Management Area

Executive Summary

The Fox Canyon Groundwater Management Agency (FCGMA), the Groundwater Sustainability Agency (GSA) for the portions of the Oxnard Subbasin (Subbasin) within its jurisdictional boundaries, in coordination with the Camrosa Water District-Oxnard GSA and the Oxnard Outlying Areas GSA (County of Ventura), has prepared this first Periodic Evaluation of the Oxnard Subbasin Groundwater Sustainability Plan (GSP) in compliance with the 2014 Sustainable Groundwater Management Act (SGMA) (California Water Code, Section 10720 et seq.)[1]. This first Periodic Evaluation of the GSP evaluates impacts of climate, water usage trends, and groundwater management decisions on groundwater conditions in the Subbasin between water year 2020[2] and water year 2024 and provides an assessment of whether GSP implementation is on track to achieve the sustainability goal of the Subbasin by 2040.

The GSP was submitted to the Department of Water Resources (DWR) on January 13, 2020, and was approved by DWR on November 18, 2021. The GSP reported on groundwater conditions through water year 2015. This evaluation includes an assessment of groundwater condition changes since the GSP was submitted. DWR's approval of the GSP included four recommended corrective actions, which FCGMA has worked to address over the past three years (Table ES-1, Recommended Corrective Actions and Corresponding FCGMA Activities).

Table ES-1. Recommended Corrective Actions and Corresponding FCGMA Activities

NO.	Summary of Recommended Corrective Action	Activities completed by FCGMA			Discussion of FCGMA Responses
		Technical Analysis or Study	New Project	Updated Monitoring Network	
1	Investigate the connectivity between surface water and groundwater	✓	✓	✓	Section 2.2.6
2	Discuss the impact of future seawater intrusion on beneficial uses and users	✓			Section 2.2.3
3	Incorporate periodic land subsidence monitoring into the GSP's monitoring plan			✓	Sections 2.2.5 and 7.2
4	Elaborate on the use of groundwater levels as a proxy for degraded water quality	✓	✓		Section 2.2.4

Additionally, since adopting the GSP, FCGMA has been working to fill data gaps identified in the GSP, implement projects and management actions, and address legal actions taken in the Subbasin. FCGMA has undertaken these efforts in conjunction with other local agencies, and in consultation with interested parties in the Subbasin and the adjacent Pleasant Valley Basin (PVB) and Las Posas Valley Basins (LPVB). Targeted workshops were held during the development of this first Periodic Evaluation to solicit feedback and suggestions that have shaped the interpretations and recommendations presented in this document. The FCGMA Board of Directors remains committed to engaging with interested parties over the next periodic evaluation cycle.

1 The GSAs that overlie that Oxnard Subbasin have not been modified since the GSP was submitted.
2 A water year begins October 1 and ends September 30 to reflect the precipitation patterns in California. Under DWR's definition of a water year, water year 2024 began October 1, 2023, and ended September 30, 2024.

Current Groundwater Conditions

Five principal aquifers are present in the Subbasin: the Oxnard aquifer, Mugu aquifer, Hueneme aquifer, Fox Canyon aquifer (FCA), and Grimes Canyon aquifer (GCA) (FCGMA 2019). The Oxnard and Mugu aquifers compose the Upper Aquifer System (UAS), and the Hueneme, FCA, and GCA compose the Lower Aquifer System (LAS). Groundwater production for agricultural, municipal, and industrial use has induced seawater intrusion in both the UAS and LAS along the southwestern boundary of the Subbasin (FCGMA 2019). This first Periodic Evaluation of the GSP evaluates impacts of climate, water usage trends, and groundwater management decisions on groundwater conditions in the UAS and LAS between water year 2015 and water year 2024. For context, this first Periodic Evaluation of the GSP provides information on groundwater elevation and groundwater quality changes since calendar year 2015, which is the last data reported in the GSP.

Between water year 2015 and 2022, the Subbasin experienced seven years of drier-than-average conditions[3]. Consequently, fall groundwater elevations in both the UAS and LAS declined between 2015 and 2022, even after FCGMA purchased 15,000 AF of supplemental State Water Project water for recharge in the Subbasin in water year 2019. The wetter than average 2023 and 2024 water years resulted in increased availability of Santa Clara River surface water diversions for United's conjunctive use and groundwater recharge operations. These diversions supported groundwater elevation recoveries across the Subbasin over the past two water years. Groundwater elevations are currently higher than those measured in 2015.

While groundwater elevations are higher than they were in 2015, available groundwater quality and groundwater elevation data indicate that the Subbasin experienced additional seawater intrusion over the evaluation period. The largest increases in chloride concentration associated with seawater intrusion were measured near Port Hueneme and Point Mugu. Near Port Hueneme, chloride concentration increases were largest in the UAS. Conversely, near Point Mugu, chloride concentration increases were largest in the LAS. Groundwater elevations were below the measurable objectives established in the GSP, suggesting that the increased chloride concentrations observed at the coastline are the result of seawater intrusion. The numerical model indicates that, between 2015 and 2022, groundwater elevations below the measurable objectives may have resulted in an additional 113,600 acre-feet of seawater intrusion into the Subbasin.

Relationship to the Sustainable Management Criteria

The GSP established minimum threshold and measurable objective groundwater elevations at 34 representative monitoring points, or "key wells", in the Subbasin. As noted in the GSP, groundwater elevations below the minimum thresholds are likely to cause net seawater intrusion and landward migration of saline water. In 2015, groundwater elevations were lower than the minimum threshold groundwater elevations at all 34 key wells (FCGMA 2019).

The GSP acknowledged that groundwater elevation recoveries from 2015 conditions to the measurable objectives would require progressive implementation of projects and management actions over a 20-year period. To account for this, the GSP established interim milestones that serve as groundwater elevation targets through 2040. Under average climate conditions, the interim milestones targeted groundwater elevation recoveries that averaged approximately 14 feet in the UAS and approximately 22 feet in the LAS over the first five years of GSP

3 The Subbasin received higher than average precipitation in water years 2017 and 2019, but the precipitation and local surface water available for diversion was not sufficient for the Subbasin to recover from long-term drought conditions.

implementation. The groundwater elevations measured in spring 2024 ranged from approximately 5 to 117 feet higher than those in spring 2015.

Importantly, groundwater elevations in spring 2024 were higher than the minimum thresholds in 21 of the 27 key wells, based upon the available data. FCGMA anticipates that the general trend of rising groundwater elevations will continue through 2040 with continued implementation of the GSP.

Water Supplies in the Subbasin

Water Supplies in the Subbasin consist of surface water, imported water, recycled water, and groundwater (Table ES-2, Historical and Current Water Supplies in the Oxnard Subbasin). Total water supplies since 2015 (2016-2022) were approximately 26% lower than the historical average, largely due to a reduction in the availability of Santa Clara River water during drought years. However, total groundwater usage and imported water reliance were also lower than the historical average. Total groundwater usage declined by approximately 6% since 2015, with production from the UAS decreasing by approximately 15%, and groundwater production from the LAS increasing by approximately 9% (Table ES-2). Groundwater production reductions were principally due to groundwater extraction allocation revisions implemented by FCGMA.

Since January 2016, agencies in the Subbasin, with support from FCGMA, have been delivering recycled water for agricultural irrigation. This represents a new source of irrigation water supply in the Subbasin.

Table ES-2. Historical and Current Water Supplies in the Oxnard Subbasin

Water Source		Historical Average (1985 - 2015) [Acre-Feet per Year][a]	Current Average (2016 - 2022) [Acre-Feet per Year][a]
Groundwater	Upper Aquifer System	49,170	41,670
	Lower Aquifer System	31,250	33,940
	Subtotal	80,420	75,610
Surface Water	Conejo Creek	1,160	2,050
	Santa Clara River[b]	64,730	31,320
Imported Water		14,540	9,250
Recycled Water		0	1,030
	Total	**160,850**	**119,260**

[a] Rounded to the nearest ten (10) acre-feet.
[b] Includes Santa Clara River water recharged in the Oxnard Forebay

State of Overdraft

Historical overdraft in the Subbasin has resulted in seawater intrusion and the migration of saline water in the UAS and LAS, principally near the southern coastal area of the Subbasin. To better characterize the degree of overdraft currently occurring in the Subbasin, the sustainable yield was re-evaluated through multiple new future condition numerical groundwater flow modeling scenarios. In the event that no new projects are implemented in the Subbasin, the sustainable yield of the UAS is estimated to be 32,900 AFY, and the sustainable yield of the LAS is estimated to be 10,600 AFY[4]. The sustainable yield of the LAS increased by approximately 3,000AFY, relative to the sustainable yield calculated in the GSP, in part because of an anticipated increase in the availability of surface water and recycled water for recharge. Groundwater production from the UAS and LAS currently exceeds these estimates by approximately 8,800 AFY and 23,300 AFY, respectively. Actual overdraft may exceed this estimate due to uncertainty in the estimated sustainable yield.

Future Groundwater Conditions

Under Future Baseline conditions, groundwater production is anticipated to exceed the sustainable yield of the UAS and LAS by 7,100 AFY and 17,700 AFY, respectively. To address this, FCGMA and other agencies in the Subbasin have made significant progress developing projects and management actions that mitigate overdraft and seawater intrusion by 2040. These include:

- The development and implementation of a fixed extraction allocation system that places an upper bound on the total allowable annual extractions available to each operator in the Subbasin.
- The development and implementation of projects, and policy, which expand availability and usage of recycled water.
- The development and implementation of projects that increase surface water diversions from Santa Clara River for recharge and delivery for use in lieu of groundwater.
- The development and evaluation of seawater intrusion barrier projects that create new water supplies and increase the sustainable yield of the Subbasin.

The benefits of future projects and management actions, and their ability to mitigate overdraft, were evaluated through numerical modeling (Table ES-3, Estimated Project-Related Future Sustainable Yield).

Table ES-3. Estimated Project-Related Future Sustainable Yield

Model Scenario Name	Projects Evaluated	Estimated Sustainable Yield (Acre-Feet per Year)[a]		Estimated Remaining Overdraft (Acre-Feet per Year)	
		Upper Aquifer System	Lower Aquifer System	Upper Aquifer System	Lower Aquifer System
Projects	▪ Expansion of Santa Clara River water diversions. ▪ Voluntary temporary fallowing ▪ infrastructure improvements	34,900	13,300	5,100	15,000
Basin Optimization	▪ Redistribution of pumping	34,000	17,100	6,000	11,200
Future Baseline with EBB	▪ Extraction Barrier and Brackish Water Treatment Project (Seawater Intrusion Extraction Barrier)	40,000[c]	28,200	-	-

Notes: "-" indicates that Overdraft is addressed; WLPMA = West Las Posas Management Area of the Las Posas Valley Basin.
[a] Sustainable yield increases associated with each project may not be additive.

[4] Due to uncertainty in the model-estimates of seawater flux into the Oxnard Subbasin, the sustainable yield of the UAS may range from 30,000 to 38,200 AFY, and the sustainable yield of the LAS may range from 7,000 to 14,200 AFY (FCGMA, 2019).

[b] Estimated based on the Future Baseline groundwater extraction rates, which are equal to the 2016 to 2022 average, adjusted for estimated Santa Clara River water availability.
[c] Excludes the 10,000 AFY of simulated brackish water extractions from the Subbasin via United Water Conservation District's Extraction Barrier and Brackish Water Treatment project extraction wells.

While the modeling suggests that future projects will play a critical role in mitigating overdraft and achieving the sustainability goal for the Subbasin, uncertainty remains surrounding the timing, feasibility, scale, and cost of each project. Additional numerical modeling would need to be conducted to characterize the individual, rather than collective, benefits of each project. FCGMA anticipates coordinating with agency-leads for each of these projects to integrate updated project understandings into the GSP as they evolve.

Importantly, over the next five years, United Water Conservation District will be developing and implementing Phase I of their Extraction Barrier and Brackish Water Treatment project. This project is intended to create a seawater intrusion barrier by extracting brackish water near Point Mugu and maintaining a pumping trough that helps prevent landward migration of saline water. This project is anticipated to both increase water supplies in the Subbasin, through delivery of treated brackish water, and increase the sustainable yield of the Subbasin. Results from Phase I of this project, which is anticipated to start in 2028, will inform the need to revise the sustainable management criteria for the Subbasin to allow for project-related groundwater elevation declines along the coast and provide operators with additional flexibility.

Assessment of Progress Towards Sustainability

The primary sustainability goal for the Subbasin is to "to increase groundwater elevations inland of the Pacific coast in the aquifers that compose the UAS [Upper Aquifer System] and the LAS [Lower Aquifer System] to elevations that will prevent the long-term, or climatic cycle net (net), landward migration of the 2015 saline water impact front; prevent net seawater intrusion in the UAS; and prevent net seawater intrusion in the LAS" (FCGMA 2019). GSP implementation, thus far, is on track to meet the sustainability goal set forth in the GSP. This has been accomplished through:

- Development of policy that allocates groundwater extractions in a manner consistent with the GSP and SGMA.
- Diversification of water supplies and reduction in groundwater production from the Subbasin.
- Ongoing groundwater elevation and quality monitoring.
- Implementation of projects that address data gaps,
- Development, evaluation, and implementation of projects that increase water supplies and the sustainable yield of the Subbasin.
- Recharge to the groundwater aquifers from two consecutive water years (2023 and 2024) with above average precipitation

The information collected through the implementation of projects to address data gaps and ongoing groundwater elevation and quality monitoring has resulted in improved estimates of the sustainable yield of the Subbasin and potential improvements to the sustainable management criteria that will guide management over the next five years. Significantly, adjudication proceedings have been undertaken in the Subbasin. At this time, it is unclear what legal effect the adjudication action will have on FCGMA's continued ability to implement the GSP and sustainably manage the Subbasin. Over the next five-years, FCGMA will continue to work towards sustainability and will re-evaluate the impacts of climate, water usage, project implementation, and legal actions on groundwater conditions and groundwater management in the Subbasin in accordance with the ongoing GSP evaluation process and adaptive management approach outlined in SGMA.

Summary of Public Comment

The FCGMA Board of Directors has prioritized outreach and engagement with interested parties throughout the GSP implementation process. In conjunction with the development of this first Periodic Evaluation, interested parties feedback was solicited at FCGMA Board meetings, in public and technical workshops, and through release of a Draft Periodic Evaluation of the GSP, which was made available for review on the FCGMA website for 45 days. FCGMA received six comment letters on the Draft Periodic Evaluation. Comment themes focused on the numerical modeling, projects and management actions, and the sustainable management criteria. Several of the comments made suggestions for additional work that needs to be done over the upcoming evaluation period. FCGMA recognizes and appreciates the significant contributions of the interested parties that have participated in the development of the GSP, its implementation, and this first Periodic Evaluation.

At the January 22, 2025 meeting of the FCGMA Board of Directors, the Board Directed that the following statement be included in this Periodic Evaluation:

> This first periodic Evaluation of the GSP also includes updated groundwater modeling and new additional preliminary groundwater modeling simulations of future groundwater usage scenarios and sustainable yields' This work is ongoing and subject to further stakeholder engagement, which may result in revisions to the information presented herein. Stakeholders have requested more comprehensive analysis of simulation results. Some stakeholders, while acknowledging the PVB and Oxnard Subbasins are interconnected, have questioned statements that pumping in the PVB impacts seawater intrusion in the Oxnard Subbasin, so this issue will be further evaluated as part of the ongoing GSP evaluations. Stakeholders are also interested in a more comprehensive analysis of the groundwater model simulations to assess potential unintended consequences. For example, some of the preliminary simulation results show that certain groundwater usage scenarios result in losses of recharge from precipitation and applied water, shifts in flows between groundwater basins (that negatively impacts PVB and Oxnard Subbasin water supplies), significant losses of stream recharge, and significant increases in evapotranspiration and drain flows, which results in a waste of water resources. The FCGMA Board is committed to further stakeholder engagement to address these concerns and continue a robust evaluation of the GSP in order to ultimately adopt amendments to the GSP that provide benefits to the community and environment at reasonable costs.

1 Significant New Information

Fox Canyon Groundwater Management Agency (FCGMA) and other agencies in the Oxnard Subbasin (Subbasin; California Department of Water Resources [DWR] Bulletin 118 Groundwater Basin 4-004.02) have designed, funded, and implemented a range of projects and management actions that facilitate implementation of the Groundwater Sustainability Plan (GSP) for the Subbasin. These have included: the development of policy that support management of groundwater extractions from the Subbasin in a manner consistent with the GSP; the implementation of technical studies that address data gaps and improve the hydrogeologic conceptual model of the Subbasin; and the implementation and development of larger capital projects that increase water supplies and decrease groundwater demands within the Subbasin. Additionally, there have been legal challenges filed against FCGMA's management of the Subbasin including a challenge to the GSP and request for a comprehensive adjudication. These activities are summarized in Table 1-1, Summary of New Information Since GSP, and are discussed in detail in Section 3, Status of Projects and Management Actions.

Table 1-1. Summary of New Information Since GSP

Significant New Information	Description	Aspects of Plan Affected	Warrant Changes to Any Aspects of the Plan
Legal Challenges			
OPV Coalition, et al. v. Fox Canyon Groundwater Management Agency, Santa Barbara Sup. Ct. Case No. VENCI00555357	In June 2021, the OPV Coalition filed a lawsuit against FCGMA, challenging the OPV (Oxnard and Pleasant Valley) GSPs, the ordinance that establishes extraction allocations (limits) for all users in the Basins, and requesting an adjudication of all groundwater rights in the Basins. At this time, it is unclear what legal effect the lawsuit, in particular the adjudication action, will have on FCGMA's continued ability to implement the OPV GSPs and sustainably manage the Basins.	Unknown	Unknown
City of Oxnard v. Fox Canyon Groundwater Management Agency, Los Angeles Sup. Ct. Case No. 20STCP00929	In December 2019, the City of Oxnard (City) filed a petition for writ of mandate challenging FCGMA's adoption of an ordinance intended to transition the Agency's current groundwater management programs to sustainable groundwater management under SGMA. FCGMA amended its ordinance in response to the court's August 2023 writ of mandate.	Unknown	Unknown
Monitoring Network Information			
New Monitoring Data	Two nested monitoring well clusters were installed within the Oxnard Pumping Depression Management	Monitoring Network	No

Table 1-1. Summary of New Information Since GSP

Significant New Information	Description	Aspects of Plan Affected	Warrant Changes to Any Aspects of the Plan
	Area, adjacent to the PVB, in 2019 and 2020.		
Interferometric Synthetic Aperture Radar (InSAR) Data	DWR InSAR data are now available to examine land subsidence in the Oxnard Subbasin.	Monitoring Network	No
Projects and Management Actions			
Management Actions			
Fixed Extraction Allocation System	In 2019, FCGMA adopted a fixed extraction allocation system, which placed an upper bound on the total allowable annual extractions available to each operator in the Subbasin. Since adoption of the GSP, FCGMA has adopted ordinance amendments and resolutions to facilitate transition to the new allocation system, provide policies and procedures for seeking variances, and made modifications required under a court order addressing a challenge to the ordinance.	Projects and Management Actions	No
In-lieu recycled water for agricultural irrigation program	In 2023, FCGMA adopted 23-02, which provides a “recycled water pumping allocation” to the City of Oxnard for delivery of recycled water from its Advanced Water Purification Facility to agricultural operators in the Saline Intrusion and Pumping Depression Management Areas for irrigation in lieu of pumping groundwater	Projects and Management Actions	No
Project Prioritization Process and Criteria	In 2023, FCGMA adopted a formal process for evaluating and prioritizing projects in the Subbasin. This process, which was developed with input from interested parties, provides other agencies and interested parties in the Subbasin to submit project information to FCGMA for consideration in future funding opportunities and GSP modeling.	Projects and Management Actions	No
Water Supply Projects			
Projects that are currently being implemented			
Advanced Water Purification Facility Improvements – Phase II	Expansion of the City of Oxnard’s Advanced Water Purification Facility (AWPF) to generate an additional 4,500	Projects and Management Actions	No

Table 1-1. Summary of New Information Since GSP

Significant New Information	Description	Aspects of Plan Affected	Warrant Changes to Any Aspects of the Plan
	AFY of reclaimed water. (City of Oxnard 2022).		
Aquifer Storage and Recovery Program	Construction of additional aquifer storage and recovery (ASR) wells, and potentially above ground storage, to increase system capacity for the City of Oxnard (City of Oxnard 2022).	Projects and Management Actions	No
Extraction Barrier and Brackish Water Treatment Project	Extraction of brackish groundwater in the Oxnard, Mugu, and Fox Canyon aquifers near Point Mugu to help prevent landward migration of the saline water impact front (UWCD 2021a).	Projects and Management Actions	No
Freeman Diversion Expansion Project	Expansion of the existing intake, conveyance, and recharge facilities to divert surface water at higher flow rates and with higher sediment loads than is possible with UWCD's existing Freeman Diversion on the Santa Clara River (FCGMA 2022).	Projects and Management Actions	No
Ferro-Rose Artificial Recharge of Groundwater	Expansion and Extension of existing conveyance structures and connection to the Ferro-Rose recharge basin, to allow for more recharge and increase diversions, within the limits of UWCD's existing water right, from the Santa Clara River during high-flow events. This project is a component of the Freeman Diversion Expansion Project. (FCGMA 2022).	Projects and Management Actions	No
Purchase of Supplemental State Water Project (SWP) Water	In years when SWP water is available in excess of UWCD's Table A allocation, it would be purchased and used for recharge in the Oxnard Subbasin and delivered to users on the PTP and PVCWD systems (FCGMA 2022).	Projects and Management Actions	No
Future Projects			
Laguna Road Recycled Water Pipeline Interconnection	Construction of a new pipeline interconnection to allow conveyance of recycled water from Pleasant Valley County Water District's (PVCWD's) system to UWCD's Pumping Trough Pipeline (PTP) system. This will allow for full utilization of available recycled water (FCGMA 2022).	Projects and Management Actions	No

Table 1-1. Summary of New Information Since GSP

Significant New Information	Description	Aspects of Plan Affected	Warrant Changes to Any Aspects of the Plan
Nauman-Hueneme Road Recycled Water Pipeline Interconnection	Construction of a new pipeline interconnection to allow conveyance of recycled water from the City of Oxnard's AWPF system, at Hueneme Road, to UWCD's PTP system to allow full utilization of available recycled water. This project is a potential alternative to, or supplement for, the Laguna Road Recycled Water Pipeline interconnection (FCGMA 2022).	Projects and Management Actions	No
Seawater Intrusion Injection Barrier	Potential use of AWPF water to create a seawater intrusion injection barrier to help prevent landward migration of the saline water impact front.	Projects and Management Actions	No
Destruction of Abandoned Wells	Identification and destruction of abandoned wells in the Oxnard Subbasin to reduce the cross-connection provided by wells screened across multiple aquifers (FCGMA 2022).	Projects and Management Actions	No
Projects to Address Data Gaps			
Installation of Additional Groundwater Monitoring Wells	This project proposes installation of multi-depth monitoring wells in the Oxnard Subbasin to assess groundwater conditions in the principal aquifers in areas of the Oxnard Subbasin that lack data (FCGMA 2022).	Projects and Management Actions	No
Installation of Additional Shallow Groundwater Monitoring Wells	This project proposes installation of shallow monitoring wells to assess groundwater conditions along the Revolon Slough, Calleguas Creek, and the Santa Clara River (FCGMA 2022).	Projects and Management Actions	No
Installation of Transducers in Monitoring Wells	This project proposes installation of transducers in key wells, or key wells, in the Subbasin to reduce the temporal data gaps that currently exist in the record of aquifer conditions (FCGMA 2022).	Projects and Management Actions	No

Notes: OPV = Oxnard and Pleasant Valley; N/A = Not Applicable; PVCWD = Pleasant Valley Count Water District; FCGMA = Fox Canyon Groundwater Management Agency; CWD = Camrosa Water District; CSD = Camarillo Sanitary District; UWCD = United Water Conservation District; WRP = Water Reclamation Plant.

2 Current Groundwater Conditions

2.1 Background

The Oxnard Subbasin of the Santa Clara River Valley Groundwater Basin (DWR Bulletin 118 Groundwater Basin 4-004.02) is a coastal alluvial groundwater subbasin, underlying the Oxnard Plain in Ventura County, California (Figure 2-1 Vicinity Map for the Oxnard Subbasin). The Subbasin is in hydrologic communication, to varying degrees, with the Las Posas Valley Basin (LPVB) and Pleasant Valley Basin (PVB) to the east, the Mound and Santa Paula Subbasins of the Santa Clara River Valley Basin to the north, and with the Pacific Ocean to the west and southwest (FCGMA 2019). The boundary between the Subbasin and the PVB is defined by a facies change[5] and the boundary between the Subbasin and the LPVB is a jurisdictional boundary that follows parcel lines. The contact between permeable alluvium and semi-permeable rocks of the Santa Monica Mountains defines the southeastern boundary of the Subbasin, and the Oak Ridge and McGrath faults form the northern boundary of the Subbasin (DWR 2018; FCGMA 2019).

Five principal aquifers are defined in the Subbasin: the Oxnard aquifer, Mugu aquifer, Hueneme aquifer, Fox Canyon aquifer (FCA), and Grimes Canyon aquifer (GCA) (FCGMA 2019). The Oxnard and Mugu aquifers compose the Upper Aquifer System (UAS), and the Hueneme, FCA, and GCA compose the Lower Aquifer System (LAS). Groundwater production for agricultural, municipal, and industrial use has induced seawater intrusion in both the UAS and LAS along the southwestern boundary of the Subbasin (FCGMA 2019).

The sustainability goal for the Subbasin established in the GSP is "to increase groundwater elevations inland of the Pacific coast in the aquifers that compose the UAS and the LAS to elevations that will prevent the long-term, or climatic cycle net (net), landward migration of the 2015 saline water impact front; prevent net seawater intrusion in the UAS; and prevent net seawater intrusion in the LAS" (FCGMA 2019). Groundwater elevation minimum thresholds and measurable objectives were established at representative monitoring points, referred to as "key wells" in the GSP (Figure 2-2, Representative Monitoring Points in the Oxnard Subbasin). The measurable objective water levels are "the water levels measured at each of the key wells throughout the Subbasin—at which there is neither seawater flow into nor freshwater flow out of the UAS or LAS" (FCGMA 2019). The minimum threshold water levels are water levels that minimize the landward migration of the 2015 saline water impact front and allow declines in groundwater elevations during periods of future drought to be offset by recoveries during future periods of above-average rainfall (FCGMA 2019).

Groundwater elevations at the key wells were below the minimum threshold groundwater elevations in 2015. Therefore, the GSP established interim milestone groundwater elevations as targets for groundwater elevation recoveries every five years between 2020 and 2040 (FCGMA 2019). The GSP established two sets of interim milestones, one for groundwater elevations to reach the minimum thresholds by 2040, and a second for groundwater elevations to reach the measurable objectives by 2040. These two sets of interim milestones were established to account for the climatic influence on groundwater elevations (FCGMA 2019). Under drought conditions, groundwater recovery is hampered by the lack of surface water available for recharge. Therefore, the GSP selected a drought condition recovery that would bring groundwater elevations to the minimum threshold by 2040. In contrast, under average climatic conditions, groundwater elevations are expected to recover to the

5 A facies change is a change in the sediment characteristics. In this case, there is a lateral change from coarser grained sediments in the Subbasin to finer grained sediments in the PVB.

measurable objective groundwater elevation under average climatic conditions. Between October 1, 2019, and September 30, 2023, the Subbasin received an annual[6] average of 12.8 inches of precipitation. This is similar to, but approximately 9% lower than, than the long-term annual average precipitation of 14.1 inches. Therefore, for this five-year evaluation, groundwater elevations are compared to the interim milestones for average precipitation conditions.

The groundwater elevation minimum thresholds and measurable objectives selected to meet the sustainability goal for the Subbasin were used as a proxy for all other applicable sustainability indicators in the GSP (FCGMA 2019). These groundwater elevations are higher than the historical low groundwater elevations. Therefore, the minimum thresholds and measurable objective water levels will prevent chronic lowering of groundwater levels, significant and unreasonable reduction of groundwater storage, degraded water quality as a result of groundwater production, and land subsidence related to groundwater production (FCGMA 2019). Depletions of interconnected surface water that result in a significant and unreasonable loss of groundwater-dependent ecosystem (GDE) habitat have not occurred within the Subbasin because there is only minor (<31 AFY) production from the semi-perched aquifer, which is the source of the groundwater that supports GDEs in the Subbasin (FCGMA 2019). The semi-perched aquifer is not considered a principal aquifer in the Subbasin, and there are currently no plans to produce groundwater from this unit in the future (FCGMA 2019).

2.1.1 DWR Recommended Corrective Actions

DWR's assessment and approval of the GSP included four "recommended corrective actions" that should be considered for the first five-year GSP evaluation. These recommended corrective actions and the applicable sustainability indicators are:

RECOMMENDED CORRECTIVE ACTION 1

Investigate the hydraulic connectivity between the surface water bodies, semi-perched aquifer, and principal aquifers to improve the understanding of potential migration of impaired water, the reliance of two potential GDEs on the semi-perched aquifer, and depletion of interconnected surface water bodies. Also, identify specific locations of gaining and losing reaches of surface water bodies and quantify the depletion of interconnected surface water. Describe schedule and steps that will be taken to fill data gaps identified in the GSP related to shallow groundwater monitoring near surface water bodies and GDEs.

Recommended corrective action 1 applies to depletions of interconnected surface water.

RECOMMENDED CORRECTIVE ACTION 2

Under the dry climatic condition scenario, the groundwater levels will only reach minimum thresholds by 2040, which will limit seawater intrusion but not necessarily avoid the condition. Discuss the impact of further seawater intrusion and associated loss of storage on beneficial uses and users under the dry climatic condition scenario and the potential impacts to uses and users inland of the 2015 saline water impact area if landward migration of the saline water impact front continues.

[6] This is a water-year annual average, not a calendar year annual average.

Recommended corrective action 2 applies to seawater intrusion.

RECOMMENDED CORRECTIVE ACTION 3

Incorporate periodic subsidence monitoring into the GSP's monitoring plan that can be used to quantify whether land subsidence is occurring and whether the groundwater level proxy is avoiding undesirable results associated with land subsidence. As an option, the Department provides statewide InSAR data that can be used for monitoring land subsidence.

Recommended corrective action 3 applies to land subsidence.

RECOMMENDED CORRECTIVE ACTION 4

Elaborate how the Agency is planning to verify that the groundwater level thresholds are adequate to assess the groundwater quality conditions in the Subbasin. Discuss how the groundwater quality data from the existing monitoring network will be used for sustainable management of the Subbasin. Coordinate with the appropriate groundwater users, as identified in the GSP, and the appropriate water quality agencies in the Subbasin to evaluate how the Agency's current groundwater management strategy is affecting the groundwater quality in the Subbasin.

Recommended corrective action 4 applies to degraded water quality.

2.2 Current Conditions Related to Sustainability Indicators

The following sections discuss the current groundwater conditions related to each of the sustainability indicators in the Subbasin. The groundwater levels relative to the GSP-defined sustainable management criteria (SMC) are discussed in Section 2.2.1, Chronic Lowering of Groundwater Levels, along with a discussion of undesirable results related to groundwater levels, DWR recommended corrective actions related to groundwater levels, and progress toward achieving sustainability. Sections 2.2.2, Reduction of Groundwater in Storage, through 2.2.6, Depletion of Interconnected Surface Waters, focus on the undesirable results, DWR recommended corrective actions, and the progress toward achieving sustainability for each sustainability indicator.

Changes to the SMCs, where recommended, are discussed relative to each sustainability indicator.

2.2.1 Chronic Lowering of Groundwater Levels

This section summarizes current (i.e., water year 2024) groundwater elevations in the Subbasin as well as their relation to the SMCs established in the GSP, groundwater elevations measured at the start of the evaluation period[7] (i.e., water year 2020), and groundwater elevations measured at the end of the GSP reporting period (i.e., calendar year 2015). Groundwater production, climate cycles, and surface water delivery programs all influence groundwater levels in the Subbasin (FCGMA 2019). Since 2015, the Subbasin received an average of 13.5 inches of precipitation per water year, which is lower than the long-term (1957 through 2024) average precipitation of 14.2 inches per

7 The evaluation period is defined in this document as water years 2020 through 2024, which is the period since the GSP was adopted.

water year (FCGMA 2024a). Water years 2016, 2018, 2020, 2021, and 2022 were all below normal[8], dry, or critically dry water years as characterized in the GSP (FCGMA 2019; FCGMA 2024a). Water years 2017, 2019, 2023, and 2024 were all above normal or wet water years (FCGMA 2024a). Groundwater elevation recoveries discussed in the subsections below, reflect the combined influence of groundwater management and climate since the GSP was prepared.

Water year groundwater elevations are characterized using seasonal low and seasonal high measurements. Seasonal low groundwater elevations are defined in the GSP as groundwater elevations measured between October 2 and October 29 and seasonal high groundwater elevations are defined in the GSP as groundwater elevations measured between March 2 and March 29. In fall 2023 and spring 2024, measured groundwater elevations were available for 27 of the 34 key wells established in the GSP (Table 2-1, Water Year 2024 Groundwater Elevations at Key Wells in the Oxnard Subbasin; Figure 2-3, Fall 2023 Water Levels Relative to the Minimum Thresholds and Measurable Objectives; Figure 2-4, Spring 2024 Water Levels Relative to the Minimum Thresholds and Measurable Objectives).

2.2.1.1 DWR Recommended Corrective Actions

DWR did not issue a recommended corrective action specific to chronic lowering of groundwater levels, although two of the recommended corrective actions issued by DWR are related to groundwater levels (DWR 2021). These two recommended corrective actions are discussed in more detail in Sections 2.4, Seawater Intrusion, and 2.5, Groundwater Quality.

2.2.1.2 Groundwater Elevation Changes in the Subbasin

Groundwater elevations in the Subbasin generally respond to climatic conditions and the availability of Santa Clara River water for recharge and delivery for use in lieu of groundwater. Since 2015, climate in the Subbasin has varied, with drier-than-average conditions persisting through water year 2022, and wetter-than-average conditions occurring in water years 2023 and 2024. In response to this, between fall 2015 and fall 2022, groundwater elevations in the Subbasin declined by an average of approximately 19 feet in the UAS and 46 AF in the LAS. The wetter-than-average hydrology in water years 2023 and 2024 resulted in increased availability of Santa Clara River water, which supported groundwater elevation recoveries across the Subbasin. Groundwater elevations are currently higher than those measured in 2015. The sections below summarize the net groundwater elevation change in each principal aquifer over this period.

2.2.1.2.1 Upper Aquifer System

Oxnard Aquifer

The GSP reported on groundwater conditions through fall and spring of 2015. Since 2015, fall groundwater elevations in the Oxnard aquifer have increased across the Subbasin. Groundwater elevations exhibited the largest increases in the Forebay Management Area, where United Water Conservation District's (UWCD) recharge operations supported recoveries of up to approximately 110 feet (Figure 2-5, Oxnard Aquifer - Groundwater

[8] Water years have been classified into five types based on their relationship to the mean water year precipitation. The five types are: critical, dry, below normal, above normal, and wet. Critical water years are < 50% of the mean annual precipitation. Dry water years are ≥ 50% and <75% of the mean annual precipitation. Below normal water years are ≥ 75% and <100% of the mean annual precipitation. Above normal water years are ≥ 100% and <150% of the mean annual precipitation. Wet water years are ≥ 150% of the mean annual precipitation.

Elevation Changes from Fall 2015 to 2023). In the Oxnard Pumping Depression Management Area, fall groundwater elevations increased by approximately 20 to 40 feet between 2015 and 2023, and in the Saline Intrusion Management Area, groundwater elevations increased by approximately 3 to 20 feet (Figure 2-5). Groundwater elevations in the UAS exhibited similar recoveries between spring 2015 and spring 2024 (Figure 2-6, Oxnard Aquifer - Groundwater Elevation Changes from Spring 2015 to 2024).

Since 2019, the start of the evaluation period, fall groundwater elevations in the Oxnard aquifer have increased by approximately 9 to 20 feet (Table 2-1).

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Table 2-1. Water Year 2024 Groundwater Elevations at Key Wells in the Oxnard Subbasin

State Well Number	Aquifer	Management Area	Fall Groundwater Elevations			Spring Groundwater Elevations			Minimum Threshold	Measurable Objective	2025 Interim Milestone (Average Climate)
			2023 (ft MSL)	Change from 2019 (ft)	Change from 2015 (ft)	2024 (ft MSL)	Change from 2020 (ft)	Change from 2015 (ft)			
01N21W32Q06S	Oxnard	Saline Intrusion	-5.79	9.03	14.45	4.86	15.68	17.59	2	17	-15
01N22W20J08S	Oxnard	Saline Intrusion	6.22	19.99	20.41	18.13	26.8	25.7	7	17	-7
01N22W26J04S	Oxnard	Saline Intrusion	-1.09	17.85	22.22	12.94	25.95	27.28	2	17	-15
01N22W27C03S	Oxnard	Saline Intrusion	4.76	19.64	19.59	7.68	16.16	16.71	7	17	-7
01N23W01C05S	Oxnard	West Oxnard Plain	7.16	8.65	8.08	12.24	10.73	11.06	7	17	4
02N22W36E06S	Oxnard	West Oxnard Plain	NM	—	—	NM	—	—	12	37	-10
01N21W32Q05S	Mugu	Saline Intrusion	-47.63	17.22	50.11	-17.87	39.66	42.86	2	17	-78
01N21W32Q07S	Mugu	Saline Intrusion	-31.15	14.09	33.87	-10.21	28.33	31.00	2	17	-52
01N22W20J07S	Mugu	Saline Intrusion	5.30	21.79	20.26	17.55	27.16	26.64	7	17	-7
01N22W26J03S	Mugu	Saline Intrusion	NM	—	—	NM	—	—	2	17	-30
01N22W27C02S	Mugu	Saline Intrusion	-0.65	20.40	21.92	14.47	27.44	28.79	7	17	-15
02N21W07L06S	Mugu	Forebay	126.12	92.4	138.2	125.85	82.64	117.65	27	62	8
02N22W23B07S	Mugu	Forebay	45.72	80.45	76.53	62.85	62.07	83.57	17	47	-11
02N22W36E05S	Mugu	West Oxnard Plain	NM	—	—	NM	—	—	12	37	-6
01N22W20J05S	Hueneme	Saline Intrusion	-0.40	28.16	27.28	13.51	32.67	33.42	2	17	-18
01N23W01C03S	Hueneme	West Oxnard Plain	-1.71	32.91	28.24	11.20	33.46	34.44	7	22	-17
01N23W01C04S	Hueneme	West Oxnard Plain	5.15	35.64	31.67	21.09	39.92	41.12	7	22	-17
02N22W23B04S	Hueneme	Forebay	-36.85	47.41	49.92	-15.79	47.76	59.80	-3	17	-67
02N22W23B05S	Hueneme	Forebay	-19.34	54.86	56.50	1.91	53.00	67.44	-3	17	-60
02N22W23B06S	Hueneme	Forebay	41.78	81.48	78.21	57.35	61.25	80.55	17	47	-15
02N22W36E03S	Hueneme	West Oxnard Plain	NM	—	—	NM	—	—	12	37	-28
02N22W36E04S	Hueneme	West Oxnard Plain	NM	—	—	NM	—	—	12	37	-13
01N21W32Q04S	FCA	Saline Intrusion	-51.95	18.09	53.43	-22.21	40.60	44.09	-23	2	-86
01N22W20J04S	FCA	Saline Intrusion	-9.13	28.5	28.0	5.96	33.18	34.08	2	17	-26[b]
01N22W26K03S	FCA	Saline Intrusion	-59.60	0.76	-	-6.82	36.92	58.81	-18	2	-52
01N23W01C02S	FCA	West Oxnard Plain	-12.67	26.88	21.67	-2.20	26.27	27.11	7	22	-25
02N21W07L04S	FCA	Forebay	52.33	67.37	84.35	61.64	55.65	57.76	17	42	-12
02N22W23B03S	FCA	Forebay	-35.13	50.39	48.42	-15.46	48.18	61.54	-3	17	-67
01N21W32Q02S	GCA	Saline Intrusion	-50.33	18.30	52.87	-18.91	42.15	45.79	-23	2	-86
01N21W32Q03S	GCA	Saline Intrusion	-61.09	17.31	53.08	-31.61	40.76	43.95	-23	2	-93
01N21W07J02S	Multiple[c]	Oxnard Pumping Depression	NM	—	—	NM	—	—	-38	2	-105
01N21W21H02S	Multiple[c]	Oxnard Pumping Depression	NM	—	—	NM	—	—	-68	-8	-103
02N21W07L03S	Multiple[c]	Forebay	42.19	53.06	66.78	48.66	50.17	46.82	17	37	-10
02N21W07L05S	Multiple[d]	Forebay	117.77	90.04	119.17	118.53	76.19	118.53	27	57	11

Notes: NM = "Not Measured", "-" indicates that one or more measurements during the analysis window were not collected.

a Positive values indicate that groundwater elevations at the key well have increased. Negative values indicate that groundwater elevations at the key well have declined.

b The Interim Milestone for this well was erroneously reported in the GSP as 42 ft. mean sea level, which is higher than the measurable objective. The interim milestone for this well was corrected as part of this periodic evaluation.

c Wells 02N21W07L03, 01N21W07J02, and 01N21W07L03 are screened in multiple aquifers. These wells were assigned to the LAS in the GSP for the purpose of defining undesirable results.

d Well 02N21W07L05 is screened in multiple aquifers, and has been assigned to the UAS for the purpose of defining undesirable result.

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Mugu Aquifer

Like the Oxnard aquifer, fall groundwater elevations in the Mugu aquifer have increased since 2015. Groundwater elevations exhibited the largest increases in the Forebay Management Area, where UWCD's recharge operations supported recoveries of up to approximately 120 feet (Figure 2-7, Mugu Aquifer - Groundwater Elevation Changes from Fall 2015 to 2023). In the Oxnard Pumping Depression Management Area, fall groundwater elevations increased by approximately 15 to 40 feet between 2015 and 2023, and in the Saline Intrusion Management Area, groundwater elevations increased by approximately 20 to 50 feet (Figure 2-7). Groundwater elevations in the UAS exhibited similar recoveries between spring 2015 and spring 2024 (Figure 2-8, Mugu Aquifer - Groundwater Elevation Changes from Spring 2015 to 2024).

Since 2019, the start of the evaluation period, fall groundwater elevations in the Mugu aquifer have increased by approximately 14 to 80 feet (Table 2-1). The largest fall groundwater elevation increases in the Mugu were measured in the Forebay Management Area. Within the Saline Intrusion Management Area, fall groundwater elevations in the Mugu increased by an average of approximately 18 feet (Table 2-1).

2.2.1.2.2 Lower Aquifer System

Hueneme Aquifer

Fall groundwater elevations in the Hueneme aquifer in the Forebay Management Area increased by 50 to 100 feet (Figure 2-9, Hueneme Aquifer – Groundwater Elevation Changes from Fall 2015 to 2023). Over the same period, along the coast and near Port Hueneme, groundwater elevations increased by approximately 20 to 25 feet (Figure 2-9). Between spring 2015 and 2024, groundwater elevations in the Forebay Management Area increased by approximately 60 to 90 feet, and groundwater elevations near Port Hueneme increased by approximately 25 to 30 feet (Figure 2-10, Hueneme Aquifer – Groundwater Elevation Changes from Spring 2015 to 2024)

Since 2019, the start of the evaluation period, fall groundwater elevations in the Hueneme aquifer have increased by up to 82 feet (Table 2-1).

Fox Canyon Aquifer

Fall groundwater elevations in the FCA within the Forebay Management Area increased by 48 to 84 feet between 2015 and 2023 (Figure 2-11, Fox Canyon Aquifer – Groundwater Elevation Changes from Fall 2015 to 2023). Over the same period within the Saline Intrusion Management Area, groundwater elevations increased by approximately 25 to 60 feet (Figure 2-11). Between spring 2015 and 2024, groundwater elevations in the Forebay Management Area increased by approximately 45 to 60 feet, and groundwater elevations in the Saline Intrusion Management Area increased by approximately 30 to 60 feet (Figure 2-12, Fox Canyon Aquifer – Groundwater Elevation Changes from Spring 2015 to 2024)

Since 2019, the start of the evaluation period, fall groundwater elevations in the FCA have increased by up to 67 feet (Table 2-1). Over the evaluation period, spring high groundwater elevation recoveries in the Saline Intrusion Management Area were larger than fall low groundwater elevation recoveries (Table 2-1).

Grimes Canyon Aquifer

GCA fall groundwater elevations in the Saline Intrusion Management Area, increased by 20 to 50 feet between 2015 and 2023 (Figure 2-13, Grimes Canyon Aquifer – Groundwater Elevation Changes from Fall 2015 to 2023). GCA groundwater elevations recoveries between spring 2015 and 2024 were similar to the fall groundwater elevation recoveries (Figure 2-14, Grimes Canyon Aquifer – Groundwater Elevation Changes from Spring 2015 to 2024)

Since 2019, fall groundwater elevations in the GCA have increased by approximately 18 feet (Table 2-1). Spring 2024 groundwater elevations were approximately 40 feet higher than they were in spring 2020 (Table 2-1).

2.2.1.3 Sustainable Management Criteria

2.2.1.3.1 Measurable Objectives

In 2015, the end of the GSP reporting period, groundwater elevations in the Subbasin were lower than the measurable objective groundwater elevations. Under average climate conditions, the GSP establishing the goal of increasing groundwater elevation to the measurable objectives by 2040. Fall 2023 groundwater elevations were above the measurable objectives at 4 of 34 key wells in the Subbasin (Table 2-1; Figure 2-3 and Figures 2-15 through 2-19). Spring 2024 groundwater elevations were above the measurable objective groundwater elevations at 8 of the 34 key wells in the Subbasin (Table 2-1; Figure 2-4 and Figures 2-15 through 2-19).

Groundwater elevations the Subbasin are influenced by water year type and the availability of surface water for recharge and use in lieu of groundwater. Because of this, there may be periods of declining groundwater elevations during dry water years. Despite this, FCGMA anticipates that the general trend of rising groundwater elevations will continue through 2040 with continued implementation of projects and management actions.

2.2.1.3.2 Minimum Thresholds

In 2015, groundwater elevations in the Subbasin were lower than the minimum threshold groundwater elevations. Fall 2023 groundwater elevations were above the minimum thresholds at 7 of the key wells in the Subbasin (Table 2-1; Figure 2-3 and Figures 2-15 through 2-19). Spring 2024 groundwater elevations were above the minimum thresholds at 21 of the key wells in the Subbasin (Table 2-1; Figure 2-4 and Figures 2-15 through 2-19). Of the six wells with spring groundwater elevations below the minimum threshold, three are screened in the UAS, and three are screened in the LAS. Geographically, these wells are distributed in the Saline Intrusion Management Area, the Forebay Management Area, and the West Oxnard Plain Management Area (Table 2-1).

2.2.1.3.3 Interim Milestones

Fall 2023 groundwater elevations were above the 2025 interim milestones at 26 of the key wells in the Subbasin (Table 2-1; Figure 2-3 and Figures 2-15 through 2-19). Spring 2024 groundwater elevations were above the 2025 interim milestones at all 27 key wells with available measurements in the Subbasin (Table 2-1; Figure 2-4 and Figures 2-15 through 2-19).

2.2.1.4 Undesirable Results

The GSP defined undesirable results for the both the UAS and LAS. The UAS is expected to experience undesirable results if:

- In any single monitoring event, water levels in 6 of the 15 key wells are below their respective minimum threshold.
- The groundwater elevation at any individual key well is below the historical low water level[9] for that well; or
- The groundwater elevation in any individual key well is below the minimum threshold for either three consecutive monitoring events or three of five consecutive monitoring events, where monitoring events are scheduled to occur in the spring and fall of each year.

Similarly, the LAS is expected to experience undesirable results if:

- In any single monitoring event, water levels in 8 of the 19 key wells are below their respective minimum threshold.
- The groundwater elevation at any individual key well is below the historical low water level[10] for that well.
- The groundwater elevation in any individual key well is below the minimum threshold for either three consecutive monitoring events or three of five consecutive monitoring events, where monitoring events are scheduled to occur in the spring and fall of each year.

During the evaluation period, groundwater elevations occurred below the historical low groundwater elevations at 9 of the 15 key wells screened in the UAS and 11 of the 19 key wells screened in the LAS (Figures 2-15 through 2-19). Additionally, groundwater elevations at all key wells in the Subbasin were below the minimum thresholds between spring 2015 and fall 2022 (Figures 2-15 through 2-19). These conditions indicate that undesirable results occurred in both the UAS and LAS between spring 2015 and fall 2022.

Importantly, fall 2023 groundwater levels were higher than they were in 2019 in all 27 key wells that were measured, and 26 were higher than the interim milestones. Therefore, management of the Subbasin under the adopted GSP, along with climate conditions that allowed for groundwater recharge in the Oxnard Forebay, has resulted in groundwater levels that are progressing toward sustainable levels that will prevent the further inland migration of the saline water impact front by 2040.

2.2.1.5 Progress Toward Achieving Sustainability

Spring 2024 groundwater elevations were higher than the spring 2020 groundwater elevations at all 11 key wells in the UAS, and all 16 of the key wells in the LAS (Table 2-1). Additionally, groundwater elevations in spring 2024 were higher than the average climate interim milestones at all 27 key wells measured in the Subbasin. These groundwater elevations reflect management decisions by FCGMA, projects that have been implemented, UWCD's recharge operations, and the influence of two water years with above average precipitation in the Subbasin. GSP implementation has been effective thus far in progressing toward groundwater sustainability by 2040.

9 Historical low water levels were defined using groundwater elevations measured prior to December 31, 2015.
10 Historical low water levels were defined using groundwater elevations measured prior to December 31, 2015.

Since 2020, groundwater production in the Subbasin averaged approximately 75,000 AFY[11], which was 900 AFY lower than the average groundwater production between 2015 and 2020. This reduction in groundwater production was due to FCGMA management actions, principally implementation of a new groundwater extraction allocation system, supported by use of new recycled water supplies provided to agricultural operators for use in lieu of groundwater. Additionally, in water year 2023, UWCD diverted approximately 111,000 (acre-feet) AF of water from the Santa Clara River for recharge in the Subbasin, which was the third largest volume of Santa Clara River water recharged in the Forebay since 1985 (FCGMA 2019). The introduction of new recycled water supplies, reduction in groundwater pumping, and historically high recharge have reversed the downward trend in groundwater elevations in the Subbasin.

2.2.1.6 Adaptive Management Approaches

FCGMA has taken several steps to adaptively manage the Subbasin since adoption of the GSP. These include:

- Purchase of 15,000 AF of supplemental State Water Project (SWP) water in 2019 to support recharge in the Forebay and conjunctive use within the Subbasin.
- Development and implementation of a new extraction allocation system with fixed allocations for all pumpers which facilitates groundwater extraction reporting and management in a manner consistent with the Sustainable Groundwater Management Act (SGMA).
- Development of project evaluation criteria and process to prioritize water supply and infrastructure projects that support groundwater sustainability in the Subbasin.
- Initial investigation of basin optimization scenarios that consider differential pumping adjustments by management area within the Subbasin.

2.2.1.7 Impacts to Beneficial Uses and Users of Groundwater

Beneficial uses and users of groundwater within the Subbasin include environmental, agricultural, domestic, and municipal and industrial users (FCGMA 2019). Groundwater elevations that remain above the minimum thresholds are anticipated to improve beneficial uses of the Subbasin by limiting seawater intrusion and chronic lowering of groundwater levels. Under average climate conditions, such as those experienced over the evaluation period, the GSP targeted raising groundwater elevations above the measurable objectives by 2040. The fact that groundwater elevations across the Subbasin are currently higher than the measurable objectives in several key wells and are above the minimum threshold groundwater elevations in both the UAS and LAS indicates that GSP implementation has positively impacted beneficial uses and users of groundwater in the Subbasin.

2.2.1.8 Changes to Sustainable Management Criteria

The minimum threshold and measurable objective groundwater elevations established in the GSP were based on results from future scenario modeling using the Ventura Regional Groundwater Flow Model (VRGWFM) (UWCD 2018; FCGMA 2019). Future scenario modeling was updated as part of this Periodic GSP evaluation. Two simulations were identified that minimize seawater intrusion and maximize total groundwater production from the Subbasin, PVB, and West Las Posas Management Area (WLPMA). These simulations are: No New Projects (NNP) 3 and Future Baseline with UWCD's Extraction Barrier and Brackish (EBB) Water Treatment project (Section 5.2,

[11] Estimated using extraction data from water years 2021 and 2022. Water year 2020 was not included in the calculation because 2020 was a transitional reporting year.

Future Scenario Water Budgets and Sustainable Yield). The simulated groundwater elevations from the NNP 3 scenario were compared to the minimum thresholds and measurable objectives in the GSP (Section 6). The comparison indicated that there are multiple combinations of groundwater elevations that can result in both the PVB and the adjacent Oxnard Subbasin reaching their respective sustainability goals. Consequently, no changes are recommended to the minimum thresholds based on the updated model scenarios run for this periodic evaluation.

Consideration of UWCD's EBB Projects

UWCD's EBB Water Treatment project is intended to create a seawater intrusion barrier, near Point Mugu, by extracting brackish groundwater in the Oxnard and Mugu aquifers near the coast and maintaining a pumping trough that helps prevent landward migration of seawater. The project will cause groundwater elevations along the coast to decline below current elevations. To account for this as part of the successful implementation of the project, the SMCs in the Subbasin may need to be lowered to provide sufficient operational flexibility for the project and operators in the Subbasin. Potential revisions to the SMCs if UWCD's EBB project is implemented are described in Section 6.3, Potential Sustainable Management Criteria with Implementation of EBB.

2.2.2 Reduction of Groundwater in Storage

2.2.2.1 DWR Recommended Corrective Actions

DWR did not issue a recommended corrective action specific to reduction of groundwater in storage, although two of the recommended corrective actions issued by DWR are related to groundwater levels and storage (DWR 2021). These two recommended corrective actions are discussed in more detail in Sections 2.2.3, Seawater Intrusion, and 2.2.4, Degraded Water Quality.

2.2.2.2 Groundwater in Storage Changes

Since adoption of the GSP, FCGMA has estimated the change in groundwater in storage in the Subbasin annually using a series of linear regression models that relate measured groundwater elevations to simulated values of change in storage (FCGMA 2020, 2021, 2022, 2023a, 2024). The linear regressions utilized results from the VRGWFM for the historical period from 1985 through 2015 (UWCD 2018). UWCD has updated the VRGWFM to improve the hydrogeologic conceptual model along the coastline and simulate groundwater conditions through September 30, 2022 (Section 4.1, Hydrogeologic Conceptual Model, and Section 5.1, Model Updates).

The change in storage values summarized below are based on the model results from the updated VRGWFM (Table 2-2a, Groundwater Recharge and Discharge from the Upper Aquifer System (Acre-Feet), and Table 2-2b, Groundwater Recharge and Discharge from the Lower Aquifer System (Acre-Feet)). Because the updated VRGWFM does not simulate water years 2023 and 2024, the change in storage for the last two years of the evaluation period were estimated using model results from water years with similar starting and ending measured groundwater elevations. Groundwater elevations in fall 2021 were similar to those measured in fall 1991 and groundwater elevations in spring 2024 were similar to those measured in the spring of 1995 (Figures 2-15 through 2-19). Because of this, the simulated change in groundwater in storage for the period from water year 1992 through 1995 is used as a proxy for the change in storage during the 2023 and 2024 water years.

2.2.2.2.1 Upper Aquifer System

The GSP reported on the change in groundwater in storage in the Subbasin through the end of calendar year 2015. Between January 1, 2016, and September 30, 2022, the VRGWFM estimates that groundwater in storage in the UAS decreased by approximately 11,400 AF. Over this same period, the model estimates that approximately 41,700 AF of seawater intruded into the UAS. Between water years 1992 and 1995, the VRGWFM estimates that groundwater in storage in the UAS increased by approximately 135,200 AF. During this period, the VRGWFM estimates that approximately 15,600 AF of seawater intruded into the UAS.

Adding the 2016 to 2022 results to the 1992 to 1995 results, used as a proxy for water years 2023 and 2024, suggests that since 2016, groundwater in storage in the UAS has increased by approximately 123,800 AF. However, over this same time period, approximately 57,300 AF of seawater has intruded into the UAS.

Table 2-2a. Groundwater Recharge and Discharge from the Upper Aquifer System (Acre-Feet)

Water Year	Stream Leakage	Volcanic Outcrops	Recharge	Subsurface Inflow from Pleasant Valley Basin	Unincorporated Areas	Subsurface Inflow from the Semi-Perched Aquifer	Subsurface Inflow from Santa Paula Basin	Sum of Coastal Flux into the Oxnard Subbasin[a]				Subsurface Inflow from the Mound Basin	Total Outflow	Pumping	Subsurface Outflow to LAS	Subsurface Outflow to West Las Posas Basin	Total Outflow	Change in Groundwater In Storage[b]
								North of Channel Islands Harbor	Channel Islands Harbor to Perkins Road	Perkins Road to Arnold Road	Arnold Road to Point Mugu							
2016[c]	1,233	3	4,144	3,063	101	14,752	1,931	2,620	1,453	926	2,566	2,946	35,738	-27,532	-17,274	-1,282	-46,087	-10,349
2017	11,133	17	13,064	3,964	132	21,317	2,526	3,557	1,976	1,218	3,283	2,950	65,136	-38,274	-22,014	-2,378	-62,666	2,470
2018	1,902	6	4,958	4,138	133	19,870	2,596	3,869	2,131	1,309	3,493	4,525	48,930	-42,979	-21,367	-1,940	-66,286	-17,356
2019	18,992	14	39,148	4,131	123	20,299	2,372	3,590	2,031	1,204	3,195	1,147	96,246	-40,631	-19,613	-3,545	-63,790	32,457
2020	10,894	12	30,780	3,136	119	17,053	2,303	2,836	1,689	1,058	2,863	1,390	74,134	-41,288	-18,986	-3,837	-64,111	10,023
2021	736	1	14,057	2,683	116	14,646	2,477	2,854	1,649	1,050	2,818	3,095	46,181	-43,478	-18,378	-2,780	-64,637	-18,456
2022	4,228	10	13,993	3,008	120	16,459	2,545	3,199	1,787	1,090	2,919	3,553	52,912	-42,229	-18,492	-2,388	-63,109	-10,197
Average	7,017	9	17,163	3,446	120	17,771	2,393	3,218	1,816	1,122	3,020	2,801	59,897	-39,487	-19,446	-2,593	-61,527	-1,630

Notes:
a Coastal flux south of Channel Islands Harbor is associated with seawater intrusion into the Oxnard Subbasin.
b Negative (-) values denote a reduction of groundwater in storage. Positive (+) values denote an increase in groundwater in storage.
c Represents the nine-month period from January 1, 2016 through September 30, 2016.

Table 2-2b. Groundwater Recharge and Discharge from the Lower Aquifer System (Acre-Feet)

Water Year	Subsurface Inflow from Pleasant Valley Basin	Subsurface Inflow from the UAS	Unincorporated Areas	Subsurface Inflow from Santa Paula Basin	Subsurface Inflow from West Las Posas Basin	Sum of Coastal Flux into the Oxnard Subbasin[a]				Subsurface Inflow from the Mound Basin	Total Inflow	Pumping	Subsurface Outflow to West Las Posas Basin	Total Outflow	Change in Groundwater In Storage[b]
						North of Channel Islands Harbor	Channel Islands Harbor to Perkins Road	Perkins Road to Arnold Road	Arnold Road to Point Mugu						
2016[c]	1,230	17,274	1	21	2,453	2,475	1,969	1,304	1,257	2,886	30,869	-31,621	0	-31,621	-752
2017	1,730	22,014	2	28	2,763	3,219	2,548	1,662	1,637	3,759	39,362	-39,041	0	-39,041	321
2018	1,038	21,367	2	28	2,388	3,303	2,631	1,767	1,718	3,421	37,662	-37,060	0	-37,060	602
2019	1,290	19,613	1	27	754	3,024	2,404	1,596	1,534	2,686	32,931	-31,536	0	-31,536	1,395
2020	1,001	18,986	1	26	0	2,651	2,173	1,493	1,370	2,638	30,338	-27,673	-134	-27,807	2,531
2021	391	18,378	1	26	169	2,597	2,087	1,505	1,392	3,269	29,816	-31,037	0	-31,037	-1,220
2022	362	18,492	1	27	472	2,731	2,160	1,502	1,413	3,554	30,715	-31,603	0	-31,603	-888
Average	1,006	19,446	1	26	1,286	2,857	2,282	1,547	1,474	3,173	33,099	-32,796	-19	-32,815	284

Notes:
a Coastal flux south of Channel Islands Harbor is associated with seawater intrusion into the Oxnard Subbasin.
b Negative (-) values denote a reduction of groundwater in storage. Positive (+) values denote an increase in groundwater in storage.
c Represents the nine-month period from January 1, 2016 through September 30, 2016.

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2.2.2.2.2 Lower Aquifer System

Between January 1, 2016, and September 30, 2022, the VRGWFM estimates that groundwater in storage in the LAS increased by approximately 2,000 AF. Over this same period, the model also estimates that approximately 37,100 AF of seawater intruded into the LAS. During the 1992 through 1995 period, the VRGWFM estimates that groundwater in storage in the LAS increased by approximately 14,200 AF. During this period, the VRGWFM estimates that approximately 19,200 AF of seawater intruded into the LAS.

Adding 2016 to 2022 results to the 1992 to 1995, used as a proxy for water year 2023 and 2024, results suggests that groundwater in storage in the LAS has increased by approximately 16,200 AF since 2016. Additionally, the VRGWFM suggests that since 2016 approximately 56,300 AF of seawater has intruded into the LAS of the Subbasin.

2.2.2.3 Undesirable Results

Groundwater levels are used as a proxy for undesirable results associated with loss of groundwater in storage. Groundwater elevations in both the UAS and LAS were below the minimum threshold groundwater elevations between January 2016 and the end of water year 2022. During this period, the VRGWFM suggests that approximately 79,000 AF of seawater intruded into the Subbasin and groundwater in storage declined by approximately 9,400 AF. These data indicate that the Subbasin experienced undesirable results related to loss of fresh groundwater in storage through the end of water year 2022.

The wet 2023 and 2024 water years facilitated groundwater elevation recoveries across the Subbasin. Over these last two years of the evaluation period, results from the VRGWFM suggest that groundwater in storage in the Subbasin increased by approximately 149,400 AF.

2.2.2.4 Progress Toward Achieving Sustainability

As described in Section 2.2.1.5, GSP implementation has been effective thus far in achieving the sustainability goal for the Subbasin by 2040.

2.2.2.5 Adaptive Management Approaches

FCGMA's approach to adaptive management is described in Section 2.2.1.6.

2.2.2.6 Impacts to Beneficial Uses and Users of Groundwater

The benefits of GSP implementation on beneficial uses and users of groundwater in the Subbasin are described in Section 2.2.1.7.

2.2.2.7 Changes to Sustainable Management Criteria

Groundwater levels are used as a proxy for groundwater in storage. There are no proposed revisions to the minimum threshold or measurable objective groundwater levels (Section 2.2.1.8). .

2.2.3 Seawater Intrusion

2.2.3.1 DWR Recommended Corrective Actions

DWR issued a recommended corrective action related to seawater intrusion (DWR 2021). This recommended corrective action states:

> "Under the dry climatic condition scenario, the groundwater levels will only reach minimum thresholds by 2040, which will limit seawater intrusion but not necessarily avoid the condition. Discuss the impact of further seawater intrusion and associated loss of storage on beneficial uses and users under the dry climatic condition scenario and the potential impacts to uses and users inland of the 2015 saline water impact area if landward migration of the saline water impact front continues."

Impacts of Dry Climate Interim Milestones

To estimate the loss of groundwater in storage associated with seawater intrusion during the 2025 to 2040 implementation period, a linear relationship was developed between the average simulated groundwater elevation within the Saline Intrusion Management Area and simulated coastal flux (i.e., seawater intrusion) into the Saline Intrusion Management Area. Based on this linear regression, it is estimated that under the average climate scenario, approximately 87,000 AF of seawater will intrude into the Subbasin between 2025 and 2040. Under the dry climate scenario, it is estimated that approximately 128,000 AF of seawater will intrude into the Subbasin over the same period. Between 70% and 75% of this estimated seawater intrusion would occur in the LAS.

The additional loss of groundwater in storage associated with seawater intrusion would impact operators in the Saline Intrusion Management Area. Over the 2016 to 2022 period, approximately 4,600 AFY of groundwater was pumped from the LAS in the Saline Intrusion Management Area. Groundwater pumped from the LAS in this part of the Subbasin supports agricultural operations and accounted for approximately 15% of the average annual production from the LAS and approximately 6% of the average annual production from the Subbasin as a whole. FCGMA and other interested parties in the Subbasin are currently evaluating projects to offset and reduce pumping within this region, which would minimize the impact of additional seawater intrusion under the dry climate scenario.

2.2.3.2 Seawater Intrusion Changes

In 2015, the known extent of saline water intrusion in the UAS and LAS generally occurred near and southeast of Port Hueneme and in the area surrounding Mugu Lagoon (FCGMA 2019). This understanding was based on UWCD's interpretation of the 100 milligrams per liter (mg/L) chloride concentration contour, developed using chloride concentrations in groundwater samples collected from coastal groundwater wells (UWCD 2016). Since adoption of the GSP, UWCD has continued to sample a network of wells along the coastline to evaluate the progression of saline intrusion in the Subbasin. In 2021, UWCD published an updated interpretation of saline water impact in the Subbasin. The updated interpretation is based on chloride concentrations measured in groundwater in 2019 and new solute transport modeling results (UWCD 2021b).

UWCD's updated interpretation indicates that the saline water impact front migrated landward from 2015 to 2020. The largest changes are in the UAS near Port Hueneme, where the 100 mg/L contour now extends north of Hueneme Road as far east as Arnold Road (UWCD 2021b). Directly adjacent to Port Hueneme, chloride concentrations increased by as much as 4,400 mg/L in the UAS between 2015 and 2020 (UWCD 2021b). In the LAS near Port Hueneme, landward migration of saline water has caused the 100 mg/L contour to extend south of the previously mapped extent; in 2020, the 100 mg/L concentration contour extended north of Hueneme Road as far east as Surfside Drive (UWCD 2021b). Farther south in the UAS, near Mugu Lagoon, chloride concentrations increased by as much as approximately 1,800 mg/L (UWCD 2021b) and the saline water impact front is interpreted to have migrated approximately 0.25 miles inland from the 2015 extent. In this same part of the Subbasin in the LAS, chloride concentrations increased by as much as 1,000 mg/L (UWCD 2021b).

The landward migration of the saline water impact front since 2016 is consistent with the prolonged period between 2016 and 2022 where groundwater elevations in both the UAS and LAS occurred below the minimum threshold groundwater elevations (Figures 2-15 through 2-19). This period corresponded to a period of extended drought, where surface water available for recharge and use in lieu of groundwater was limited.

2.2.3.3 Undesirable Results

The GSP defines undesirable results associated with seawater intrusion as, "…seawater intrusion that results in a net landward migration of the 2015 saline water impact front beyond the already impacted area west of Highway 1 and south of Hueneme Road from 2040 through 2069" (FCGMA 2019). Between water years 2019 and 2023, groundwater levels were below the minimum thresholds in the majority of the key wells in the Subbasin and the saline water impact front migrated landward (Sections 2.1 and 2.2.3). Some landward migration of the saline water impact front is expected between 2020 and 2040 as the FCGMA Board and interested parties in the Subbasin undertake necessary projects and management actions toward achieving groundwater sustainability by 2040.

2.2.3.4 Progress Toward Achieving Sustainability

As described in Section 2.2.1.5, GSP implementation has been effective thus far in achieving the sustainability goal for the Subbasin by 2040.

2.2.3.5 Adaptive Management Approaches

FCGMA's approach to adaptive management is described in Section 2.2.1.6.

2.2.3.6 Impacts to Beneficial Uses and Users of Groundwater

The benefits of GSP implementation on beneficial uses and users of groundwater in the Subbasin are described in Section 2.2.1.7.

2.2.3.7 Changes to Sustainable Management Criteria

For the GSP, the extent of saline water impact front in each principal aquifer of the Subbasin was evaluated based on the interpreted 100 mg/L chloride concentration isocontour. To better reflect the extent of brackish water in the Subbasin, the extent of saline water impact has been updated based on the interpreted 500 mg/L chloride concentration isocontour.

Groundwater levels are used as a proxy for seawater intrusion. There are no proposed revisions to the minimum threshold or measurable objective groundwater levels (Section 2.2.1.8).

2.2.4 Degraded Water Quality

This section summarizes current groundwater quality conditions in the Subbasin and the relation to groundwater quality conditions at the end of the GSP reporting period. Due to the variation in groundwater quality monitoring schedules across the Subbasin, groundwater quality is characterized using the most recent groundwater samples collected over a 5-year window. For the GSP, groundwater quality conditions were characterized using the most recent groundwater sample collected during the period from 2011 through 2015. Groundwater quality conditions over the evaluation period were characterized using measurements collected during the period from 2019 through 2023.

FCGMA adopted Basin Management Objectives for nitrate, chloride, and total dissolved solids (TDS) in the Subbasin as part of its 2007 Groundwater Management Plan (FCGMA 2007). Additionally, the Water Quality Control Plan: Los Angeles Region (Basin Plan) specifies water quality objectives for TDS, chloride, nitrate, sulfate, and boron (LARWQCB 2019). While the GSP only defines undesirable results for TDS and chloride (FCGMA 2019), the change in groundwater quality concentrations related to each constituent relative to the 2011 to 2015 period is summarized below.

2.2.4.1 DWR Recommended Corrective Actions

DWR issued a recommended corrective action related to groundwater quality (DWR, 2021). This recommended corrective action states:

> "Elaborate how the Agency is planning to verify that the groundwater level thresholds are adequate to assess the groundwater quality conditions in the Subbasin. Discuss how the groundwater quality data from the existing monitoring network will be used for sustainable management of the Subbasin. Coordinate with the appropriate groundwater users, as identified in the GSP, and the appropriate water quality agencies in the Subbasin to evaluate how the Agency's current groundwater management strategy is affecting the groundwater quality in the Subbasin."

The GSP defines undesirable results for TDS and chloride. These undesirable results are associated with seawater intrusion as well as the release of connate water from fine-grained lenses, downward migration of brines from improperly abandoned wells, and upward migration of brines from deeper geologic formations (FCGMA 2019). As described in Section 2.2.4.2, Groundwater Quality Changes in the Subbasin, TDS and chloride concentrations generally increased over the evaluation period. These increasing TDS and chloride concentrations are consistent with the prolonged period of groundwater elevations below the minimum thresholds (Section 2.1). These data support continued use of groundwater levels as a proxy for undesirable results associated with degraded groundwater quality. However, FCGMA anticipates continuing to evaluate the relationship between groundwater quality and groundwater elevations as part of the periodic evaluation process to assess whether groundwater levels continue to be an appropriate proxy for groundwater quality.

UWCD, in support of their EBB project, developed a solute-transport model for the Subbasin (UWCD 2021a). The new solute-transport model, developed using the USGS MODFLOW-USG software, is based on the same hydrogeologic conceptual model as the VRGWFM, but provides a direct simulation of chloride concentrations associated with seawater intrusion in the Subbasin, further constraining the relationship between pumping, groundwater levels, and degraded water quality. FCGMA anticipates re-evaluating the new model's use in groundwater sustainability planning as new data are integrated into the model to better constrain simulation results.

2.2.4.2 Groundwater Quality Changes in the Subbasin

2.2.4.2.1 Total Dissolved Solids

Over the 2019 to 2023 period, TDS concentrations were highest near Port Hueneme and Mugu Lagoon (Figure 2-20, Upper Aquifer System – Most Recent TDS (mg/L) Measured 2019 – 2023, through Figure 2-22, Lower Aquifer System – Most Recent TDS (mg/L) Measured 2019 – 2023). Near Port Hueneme, TDS concentrations ranged from approximately 800 to 13,400 mg/L in the UAS and 690 to 18,800 mg/L in the LAS. TDS concentrations in this part of the Subbasin were generally higher than 2011-2015 concentrations in the UAS and LAS (Figure 2-23, Change in TDS Concentration (mg/L) in the UAS between 2011-2015 and 2019-2023, through Figure 2-25, Change in TDS Concentration (mg/L) in the LAS between 2011-2015 and 2019-2023).

Near Mugu Lagoon, TDS concentrations ranged from 1,800 to 31,700 mg/L in the UAS and 960 to 36,100 mg/L in the LAS during the 2019-2023 period. Like the UAS, TDS concentrations in this part of the Subbasin were generally higher than they were between 2011 and 2015 (Figure 2-23 through Figure 2-25).

2.2.4.2.2 Chloride

Between 2019 and 2023, chloride concentrations were highest near Port Hueneme and Mugu Lagoon (Figure 2-26, Upper Aquifer System – Most Recent Chloride (mg/L) Measured 2019-2023, through Figure 2-28, Upper Aquifer System – Most Recent Chloride (mg/L) Measured 2019-2023). Near Port Hueneme, chloride concentrations ranged from approximately 210 to 7,200 mg/L in the UAS (Figure 2-26) and approximately 40 to 7,900 mg/L in the LAS (Figure 2-28). Since the 2011 to 2015 period, chloride concentrations near Port Hueneme have increased by as much as approximately 3,400 mg/L in the UAS and 1,000 mg/L in the LAS (Figure 2-29, Change in Chloride Concentration (mg/L) in the UAS between 2011-2015 and 2019-2023, through Figure 2-31, Change in Chloride Concentration (mg/L) in the LAS between 2011-2015 and 2019-2023).

Near Mugu Lagoon, chloride concentrations ranged from approximately 630 to 17,000 mg/L in the UAS and approximately 5,400 to 16,400 mg/L in the LAS (Figures 2-26 and 2-28). Since the 2011 to 2015 period, chloride concentrations near Mugu Lagoon have increased by as much as 1,030 mg/L in the UAS and 3,040 mg/L in the LAS (Figures 2-29 through 2-31).

2.2.4.2.3 Nitrate

Between 2019 and 2023, nitrate concentrations (NO_3 as nitrate) were highest in the Forebay Management Area, where elevated nitrate concentrations are likely a legacy of historical septic discharges and agricultural fertilizer application practices (FCGMA 2019; Figure 2-32, Upper Aquifer System – Most Recent Nitrate (mg/L NO_3 as Nitrate) Measured 2019-2023, through Figure 2-34, Lower Aquifer System – Most Recent Nitrate (mg/L NO_3 as Nitrate) Measured 2019-2023). In this part of the Subbasin, nitrate concentrations ranged from a low of approximately 0.4 mg/L (NO_3 as nitrate) to a high of approximately 115 mg/L (NO_3 as nitrate) in the UAS (Figure 2-32 and Figure 2-33, Upper Aquifer System, Forebay Area – Most Recent Nitrate (mg/L NO_3 as Nitrate) Measured 2019 - 2023). In the LAS, nitrate concentrations in groundwater were less than 10 mg/L, NO_3 as nitrate (Figure 2-34). Nitrate concentrations across the Subbasin have either remained stable or decreased since the 2011-2015 period (Figure 2-35, Change in Nitrate Concentration (mg/L NO_3 as Nitrate) in the UAS between 2011-2015 and 2019-2023, through Figure 2-37, Change in Nitrate Concentration (mg/L NO_3 as Nitrate) in the LAS between 2011-2015 and 2019-2023).

2.2.4.2.4 Sulfate

Between 2019 and 2023, sulfate concentrations generally ranged from 300 – 600 mg/L in the UAS (Figure 2-38, Upper Aquifer System – Most Recent Sulfate (mg/L) Measured 2019-2023, and Figure 2-39, Upper Aquifer System, Forebay Area – Most Recent Sulfate (mg/L) Measured 2019-2023) and were lower than 600 mg/L in the LAS (Figure 2-40, Lower Aquifer System - Most Recent Sulfate (mg/L) Measured 2019-2023). These concentrations are generally equal to or lower than the Regional Water Quality Control Board's water quality objectives for sulfate of 600 mg/L (LARWQCB 2019). Locally, however, sulfate concentrations exceeded these general ranges. For example, in the UAS, sulfate concentrations near Mugu Lagoon were measured as high as 2,520 mg/L and near Port Hueneme were measured as high as 1,030 mg/L (Figure 2-38). In the LAS, sulfate was measured at concentrations that exceed 2,000 mg/L at one well in the Forebay Management Area and one well near Mugu Lagoon (Figure 2-40).

In the UAS within the Forebay Management Area, sulfate concentrations in the 2019 to 2023 period ranged from approximately 450 mg/L lower than the 2011 to 2015 period, to approximately 300 mg/L higher than the 2011 to 2015 period (Figure 2-41, Change in Sulfate Concentration (mg/L) in the UAS between 2011-2015 and 2019-2023, and Figure 2-42, Change in Sulfate Concentration (mg/L) in the UAS, Forebay Area, between 2011-2015 and 2019-2023). Near the coast, sulfate concentrations have increased since the 2011 to 2015 period. The largest increases in sulfate concentration are measured near Port Hueneme and Mugu Lagoon (Figure 2-41). In the LAS concentrations in groundwater were within 200 mg/L of the 2011 to 2015 concentrations (Figure 2-43, Change in Sulfate Concentration (mg/L) in the LAS between 2011-2015 and 2019-2023).

2.2.4.2.5 Boron

Between 2019 and 2023, boron concentrations were generally lower than 1 mg/L, which is the Regional Water Quality Control Board's water quality objective for boron (Figure 2-44, Upper Aquifer System – Most Recent Boron (mg/L) Measured 2019-2023, through Figure 2-46, Lower Aquifer System – Most Recent Boron (mg/L) Measured 2019-2023). These concentrations are similar to the concentrations of boron measured in groundwater during the 2011 to 2015 period (Figure 2-47, Change in Boron Concentration (mg/L) in the UAS between 2011-2015 and 2019-2023, through Figure 2-49, Change in Boron Concentration (mg/L) in the LAS between 2011-2015 and 2019-2023).

2.2.4.3 Undesirable Results

Groundwater levels measured at the key wells in the Subbasin are used as a proxy for undesirable results associated with degraded water quality. The GSP defines undesirable results for two constituents: TDS and chloride. Based on this, the criteria used to define undesirable results for degraded water quality is the migration of the 2015 saline water impact front during the 2040 to 2069 sustaining period (FCGMA 2019).

As described in Section 2.1, prior to water year 2023, groundwater levels during the evaluation period were below the minimum threshold groundwater elevations in the majority of the key wells in the Subbasin and the saline water impact front migrated landward over the evaluation period. The landward migration of the saline water impact front has caused TDS and chloride concentrations near Port Hueneme and Mugu Lagoon to increase since 2015. Some landward migration of the saline water impact front is expected between 2020 and 2040 as the FCGMA Board and interested parties in the Subbasin undertake necessary projects and management actions toward achieving groundwater sustainability in 2040.

However, groundwater elevations have generally increased since 2015. Therefore, management of the Subbasin under the adopted GSP, along with climate conditions that allowed for groundwater recharge in the Oxnard Forebay, has resulted in groundwater levels that are progressing toward sustainable levels that will prevent the further inland migration of the saline water impact front by 2040.

2.2.4.4 Progress Toward Achieving Sustainability

As described in Section 2.2.1.5, GSP implementation has been effective thus far in achieving the sustainability goal for the Subbasin by 2040.

2.2.4.5 Adaptive Management Approaches

FCGMA's approach to adaptive management is described in Section 2.2.1.6.

2.2.4.6 Impacts to Beneficial Uses and Users of Groundwater

The benefits of GSP implementation on beneficial uses and users of groundwater in the Subbasin are described in Section 2.2.1.7.

2.2.4.7 Changes to Sustainable Management Criteria

There are no proposed revisions to the minimum threshold or measurable objective groundwater levels (Section 2.2.1.8).

2.2.5 Land Subsidence

2.2.5.1 DWR Recommended Corrective Actions

DWR issued a recommended corrective action related to land subsidence (DWR 2021). This recommended corrective action states:

> "Incorporate periodic subsidence monitoring into the GSP's monitoring plan that can be used to quantify whether land subsidence is occurring and whether the groundwater level proxy is avoiding undesirable results associated with land subsidence. As an option, the Department provides statewide InSAR data that can be used for monitoring land subsidence."

The established, and recommended, minimum threshold and measurable objective groundwater levels in the Subbasin are higher than historical low groundwater elevations. Because of this, groundwater management under the GSP is not anticipated to cause land subsidence, related to groundwater production, that would significantly impact land uses and critical infrastructure. To monitor these conditions in the future, FCGMA has incorporated periodic subsidence monitoring into the GSP monitoring network. Subsidence monitoring will be performed using DWR's statewide InSAR datasets (Section 7.4, Functionality of Additional Monitoring Network).

2.2.5.2 Land Subsidence Changes

Since 2015, DWR's InSAR data indicate that land surface elevations have changed by less than approximately 2 inches (Figure 2-50). No impacts to land uses or critical infrastructure resulting from subsidence within the Subbasin have been reported.

2.2.5.3 Undesirable Results

The GSP defines undesirable results associated with land subsidence as, "…subsidence that substantially interferes with surface land uses" (FCGMA 2019). As noted above, the Subbasin did not experience subsidence, associated with groundwater production, that substantially interfered with surface land uses. Therefore, while groundwater elevations were below the minimum thresholds through the majority of the evaluation period, they were above the historical low groundwater elevation, and undesirable results associated with land subsidence did not occur.

2.2.5.4 Progress Toward Achieving Sustainability

As described in Section 2.2.1.5, GSP implementation has been effective thus far in achieving the sustainability goal of the Subbasin by 2040.

2.2.5.5 Adaptive Management Approaches

FCGMA's approach to adaptive management is described in Section 2.2.1.6.

2.2.5.6 Impacts to Beneficial Uses and Users of Groundwater

The benefits of GSP implementation on beneficial uses and users of groundwater in the Subbasin are described in Section 2.2.1.7.

2.2.5.7 Changes to Sustainable Management Criteria

There are no proposed revisions to the minimum threshold or measurable objective groundwater levels (Section 2.2.1.8).

2.2.6 Depletions of Interconnected Surface Water

2.2.6.1 DWR Recommended Corrective Actions

DWR issued a recommended corrective action related to groundwater-surface water connections (DWR 2021). This recommended corrective action states:

> "Investigate the hydraulic connectivity between the surface water bodies, semi-perched aquifer, and principal aquifers to improve the understanding of potential migration of impaired water, the reliance of two potential GDEs on the semi-perched aquifer, and depletion of interconnected surface water bodies. Also, identify specific locations of gaining and losing reaches of surface water bodies and quantify the depletion of interconnected surface water. Describe schedule and steps

that will be taken to fill data gaps identified in the GSP related to shallow groundwater monitoring near surface water bodies and GDEs."

In 2022, FCGMA was awarded grant funds through DWR's Sustainable Groundwater Management Grant Program to support implementation of projects developed during the GSP and through subsequent discussions with interested parties. One component of this grant project is the construction of shallow and multi-depth monitoring wells in the Subbasin to address groundwater elevation data gaps identified in the GSP. Two shallow monitoring wells funded through this program are planned along Revolon Slough and Calleguas Creek, within the Oxnard Pumping Depression Management Area, and one is planned along the southern portion of Santa Clara River, within the West Oxnard Plain Management Area. FCGMA anticipates completing construction of these shallow wells in the 2024 calendar year and integrating these data into the GSP starting in water year 2025. Data collected through these new wells will be used to improve understanding of the connectivity between surface water bodies, the semi-perched aquifer, and the principal aquifers within the Subbasin.

Additionally, FCGMA anticipates using these data to evaluate the VRGWFM's representation of interconnected surface water, shallow groundwater conditions, and the connection between the semi-perched and principal aquifers within the Subbasin. UWCD has recently evaluated the connection between the semi-perched and principal aquifers near Mugu Lagoon based on additional hydrogeologic data, in support of the design and operation of their EBB project (Section 4.1). The new data collected from the shallow wells constructed along Revolon Slough and Santa Clara River will provide additional constraint on the representation of surface water bodies in the model and the influence of groundwater pumping on their depletions.

2.2.6.2 Undesirable Results

The undesirable results associated with depletion of interconnected surface water in the Subbasin is loss of GDE habitat. The primary cause of groundwater conditions in the Subbasin that would lead to loss of GDE habitat would be groundwater production from the semi-perched aquifer, which is not a principal aquifer of the Subbasin. Over the evaluation period, less than 30 AFY of groundwater was produced from the semi-perched aquifer, consistent with historical usage from this aquifer (FCGMA 2019; Table 2-2c, Groundwater Recharge and Discharge from the Semi-Perched aquifer (Acre-Feet)). In addition, satellite-based estimates of habitat health at the four GDEs identified in the GSP indicate that habitat conditions have either remained stable, or improved, since 2016 (TNC 2024). These data suggest that undesirable results associated with depletion of interconnected surface water and GDEs has not occurred during the evaluation period.

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Table 2-2c. Groundwater Recharge and Discharge from the Semi-Perched Aquifer (Acre-Feet)

				Sum of Coastal Flux into the Oxnard Subbasin											Sum of Coastal Flux into the Oxnard Subbasin						
WY	Stream Leakage	Recharge	Subsurface Inflow from Pleasant Valley Basin	North of Channel Islands Harbor	Channel Islands Harbor to Perkins Road	Perkins Road to Arnold Road	Arnold Road to Point Mugu	GHB[a]	Total Inflow	Pumping	Tile Drains	Subsurface Outflow to UAS	ET	Unincorporated Areas	North of Channel Islands Harbor	Channel Islands Harbor to Perkins Road	Perkins Road to Arnold Road	Arnold Road to Point Mugu	Subsurface Outflow to Mound Basin	Total Outflow	Change In Ground-Water Storage[b]
2016[c]	916	12,229	1,645	0	0	137	598	312	15,838	0	-2,330	-14,752	-4,399	-37	-492	-302	0	0	-318	-22,631	-6,793
2017	4,362	25,433	2,202	0	0	159	747	415	33,318	0	-4,479	-21,317	-6,377	-49	-615	-300	0	0	-701	-33,838	-520
2018	1,306	16,737	2,122	0	0	159	783	436	21,543	0	-2,725	-19,870	-5,102	-50	-470	-185	0	0	-350	-28,752	-7,209
2019	6,578	22,202	2,144	0	0	157	747	438	32,266	-100	-3,552	-20,299	-6,098	-48	-412	-97	0	0	-816	-31,421	845
2020	3,726	18,775	2,065	0	0	173	769	446	25,954	-252	-3,197	-17,053	-5,443	-36	-420	-43	0	0	-680	-27,124	-1,170
2021	1,005	12,874	1,701	0	0	190	807	457	17,035	-263	-2,030	-14,646	-4,541	-39	-339	-18	0	0	-343	-22,218	-5,184
2022	2,330	18,140	1,626	0	0	180	778	450	23,504	-195	-2,490	-16,459	-4,979	-38	-314	-18	0	0	-382	-24,877	-1,372
Average	2,889	18,056	1,930	0	0	165	747	422	24,208	-116	-2,972	-17,771	-5,277	-43	-437	-138	0	0	-513	-27,266	-3,058

Notes:

[a] GHB = General Head Boundary Condition, which represents recharge to the semi-perched aquifer through Channel Island Harbor, Port Hueneme, and Duck Ponds north of Naval Base Ventura County at Point Mugu.

[b] Negative (-) values denote a reduction of groundwater in storage. Positive (+) values denote an increase in groundwater in storage.

[c] Represents the nine-month period from January 1, 2016 through September 30, 2016.

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2.2.6.3 Progress Toward Achieving Sustainability

Groundwater levels are used as a proxy for depletion of interconnected surface waters and GDEs. Results from the numerical modeling for the GSP indicate that groundwater elevations in the semi-perched aquifer, which support GDEs in the Subbasin, will be supported by the minimum threshold and measurable objective groundwater elevations.

The groundwater elevation recoveries measured over the evaluation period suggest that groundwater conditions in the semi-perched aquifer did not negatively impact interconnected surface waters and GDEs in the Subbasin. FCGMA will further evaluation these conditions as data are collected in the shallow monitoring wells planned along Revolon Slough, Calleguas Creek, and Santa Clara River.

2.2.6.4 Adaptive Management Approaches

FCGMA's approach to adaptive management is described in Section 2.2.1.6.

2.2.6.5 Impacts to Beneficial Uses and Users of Groundwater

Satellite-based estimates of habitat health suggest that GSP implementation, and the wetter-than-average hydrology encountered in 2023 and 2024, has positively impacted interconnected surface waters and GDEs in the Subbasin (TNC 2024).

2.2.6.6 Changes to Sustainable Management Criteria

There are no proposed revisions to the minimum threshold or measurable objective groundwater levels (Section 2.2.1.8).

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3 Status of Projects and Management Actions

The GSP identified five (5) projects and two (2) management actions that support implementation of the GSP and groundwater sustainability in the Subbasin (FCGMA 2019). Projects identified in the GSP were: two projects that increased the delivery of the recycled water, produced at the City of Oxnard's Advanced Water Purification Facility (AWPF), to agricultural operators in the Subbasin; development of the Riverpark-Saticoy Groundwater Replenishment and Reuse Recycled Water Project; the Freeman Diversion Expansion Project; and a Voluntary Temporary Land Fallowing Project. Management actions identified in the GSP included reduction in groundwater production, and a water market pilot program. These projects and management actions are still relevant and feasible. Since adoption of the GSP, FCGMA and other agencies in the Subbasin have identified, designed, funded, and implemented a broader range of projects that increase water supplies and reduce groundwater demands within the Subbasin.

This section provides an assessment of the projects and management actions identified in the GSP, summarizes all new projects that have been identified in the Subbasin that support GSP implementation, and describes the process for public notice and engagement throughout the implementation of projects and management actions in the Subbasin.

3.1 Evaluation of Projects and Management Actions Identified in the GSP

3.1.1 Management Actions

In 2019, FCGMA adopted an ordinance to establish a new fixed extraction allocation system that supports managing groundwater demand in the Subbasin in a manner consistent with SGMA and the GSP. Since adoption of the GSP, FCGMA has adopted ordinance amendments and resolutions to facilitate transition to the new ordinance, provide policies and procedures for seeking variances, and made modifications required under a court order addressing a challenge to the ordinance. Additionally, FCGMA adopted resolutions increasing tiered groundwater surcharge rates for extractions that exceed allocation. The surcharge provides an economic disincentive to extract groundwater exceeding allocation.

The new extraction allocation system supports FCGMA's implementation of the two management actions identified in the GSP. Activities accomplished associated with each management action to date are summarized in Table 3-1, Status of Projects and Management Actions Identified in the GSP.

Table 3-1. Status of Projects and Management Actions Identified in the GSP

Number	Name	Description	Status	Expected Schedule	Benefits Observed to Date	Estimated Accrued Benefits at Completion
Management Actions						
1	Reduction in Groundwater Production	Reduce Groundwater production by monitoring and imposing quantitative limits on pumpers; with governing authority from the FCGMA Board.	Not implemented	Not defined	Establishment of a fixed groundwater extraction allocation system.	Mitigation of seawater intrusion and the landward migration of saline water throughout the Subbasin.
2	Water Market Pilot Program	Pilot Program to evaluate a water market, through which agricultural operators may buy, sell, or transfer extraction allocations.	Pilot program was extended through 2021 and is no longer operational	Not defined	N/A	Increased flexibility for operators in the Subbasin to adapt to reduced extraction allocations
Projects						
1	AWPF	Advanced Water Purification Facility – production and use of recycled water in lieu of groundwater.	Ongoing	Ongoing	900 AFY of in-lieu deliveries	Not Defined
2	AWPF Facility Improvements	Expansion of AWPF to produce an additional 4,500 AFY for groundwater recharge and/or deliver of new water to users in the Subbasin.	Preliminary Design	Not defined	N/A	7,000 – 10,000 AFY of additional in lieu deliveries
3	Riverpark-Saticoy GRRP	Extend recycled water pipeline 3 miles to UWCD groundwater recharge facilities.	Inactive	Not Defined	N/A	N/A
4	Freeman Diversion Expansion	Construct new facilities at Freeman Diversion to capture surface water at higher flow rates and sediment loads than currently possible; recharge groundwater	Initial phases under construction	3 to 15 years	Infrastructure improvements to increase recharge at the Ferro-Rose basin	Up to 10,000 AFY of additional diversions for recharge and delivery via PTP and PVP

Table 3-1. Status of Projects and Management Actions Identified in the GSP

Number	Name	Description	Status	Expected Schedule	Benefits Observed to Date	Estimated Accrued Benefits at Completion
5	Voluntary Temporary Fallowing	Utilize replenishment fees to lease and temporarily fallow agricultural land	Not implemented	Not defined	N/A	Up to 500 AFY groundwater demand reduction

3.1.2 Projects

3.1.2.1 Project No. 1: Advanced Water Purification Facility

3.1.2.1.1 Description of Project No. 1

The City of Oxnard's AWPF provides a source of reclaimed water that can be used for landscape irrigation, agricultural irrigation, industrial process water, and groundwater recharge. The AWPF is designed to initially treat approximately 8 to 9 million gallons per day of secondary effluent from the Oxnard Wastewater Treatment Plant and produce 6.25 million gallons per day of product water for reclaimed water uses. This is equivalent to 7,000 acre-feet per year (AFY) of product water. AWPF water was first delivered to agricultural operators in 2016.

Project No. 1 uses the existing monitoring network to evaluate improved groundwater conditions.

3.1.2.1.2 Benefits and Impacts of Project No. 1

Realized Benefits

Since 2016, the City of Oxnard has delivered an average of approximately 900 AFY of AWPF water to agricultural operators in the Subbasin and to Pleasant Valley County Water District (PVCWD), for subsequent delivery within their service area. The largest delivery of AWPF water occurred in 2018, when the City of Oxnard delivered approximately 2,400 AF of AWPF water for agricultural irrigation. This additional water increases groundwater levels in the Subbasin by providing water that would otherwise be pumped from the Subbasin.

Expected Benefits

At the time of GSP development, it was understood that the City of Oxnard would deliver 4,600 AFY of AWPF water to agricultural operators in the Subbasin and the adjacent PVB. This assumption was updated, in consultation with the City of Oxnard, as part of this periodic GSP evaluation. For planning purposes, it is presently assumed that the City of Oxnard will provide an average of 1,500 AFY of AWPF water for agricultural uses through this project. This delivery estimate may change in the future as the City of Oxnard continues to evaluate projects that could rely on AWPF water as a source of water supply. These deliveries would be made under FCGMA Resolution 2023-02.

Impacts to beneficial uses and users

Delivery of AWPF may increase the sustainable yield of the Subbasin by reducing groundwater demands in the areas that have a greater influence on seawater intrusion and the migration of saline water in the coastal area of the Subbasin. Therefore, delivery and use of this water will have a positive impact on beneficial uses and users.

3.1.2.2 Project No. 2: AWPF Facility Improvements Phase II

3.1.2.2.1 Description of Project No. 2

The purpose of the AWPF Expansion Project is to increase the production of high-quality recycled water within the City of Oxnard, the Subbasin, and the PVB. This project may provide additional reclaimed water for Subbasin recharge. The AWPF Expansion Project is predicated on the availability of secondary effluent from the Oxnard Wastewater Treatment Plant or other available and appropriate source water. The main project components include purchase and installation of additional microfiltration, reverse osmosis, and ultraviolet/advanced oxidation equipment. Additionally, the project will require construction of influent flow equalization facilities. The AWPF Expansion Project could occur in phases, which would be dictated by the availability of source water, recycled water uses and needs, and project funding.

The City of Oxnard is seeking to expand the AWPF to produce a total of approximately 14,000 AFY of water that can be delivered through existing infrastructure. These improvements will fully utilize available recycled water to provide supply resiliency and cost stabilization for the future. Additionally, this expansion will support the regional water management actions to increase the sustainable yield of the Subbasin.

Project No. 2 will use the existing monitoring network to evaluate improved groundwater conditions.

3.1.2.2.2 Benefits and Impacts of Project No. 2

Realized Benefits

This project is currently in preliminary design; thus, benefits have not yet been realized.

Expected Benefits

The current capacity of the AWPF is for 7,000 AFY of product water that can be delivered through existing infrastructure. The AWPF Facility improvements will increase capacity by 7,000 AFY to a total of 14,000 AFY of product water. The City of Oxnard is evaluating projects, and their benefits, that could rely on this water as a source of water supply.

Impacts to beneficial uses and users

The AWPF Facility Improvements Phase II would provide additional recycled water and may increase sustainable yield in the Subbasin if utilized in lieu of groundwater extraction in the Saline Intrusion and Pumping Depression management areas, and thus have a positive impact on beneficial uses and users.

3.1.2.3 Project No. 3: Riverpark-Saticoy GRRP Recycled Water

3.1.2.3.1 Description of Project No. 3

The Riverpark–Saticoy Groundwater Replenishment and Reuse Project (GRRP) Recycled Water Project would convey water produced by the AWPF (see Section 3.1.2) to the Saticoy Groundwater Recharge Facility and El Rio Groundwater Recharge Facility operated by UWCD (FCGMA 2018). In 2016, the City of Oxnard completed the northernmost portion of its 9.5-mile north–south Recycled Water Backbone Pipeline, which terminates at the Riverpark development adjacent to the Santa Clara River, north of Highway 101. This pipeline does not currently reach UWCD's groundwater recharge facilities. Under the GRRP Recycled Water Project, the Recycled Water Backbone Pipeline would be extended by 3 miles to convey water from the AWPF Expansion Project to UWCD groundwater recharge facilities. The 3-mile pipeline extension is called the Riverpark–Saticoy Pipeline. Up to 4,800 AFY of water would be conveyed to the UWCD recharge facilities via the Recycled Water Backbone and Riverpark–Saticoy Pipelines. It should be noted that this project does not provide water in addition to Project No. 2; rather, it provides the infrastructure to deliver the Groundwater Recovery Enhancement and Treatment (GREAT) AWPF expansion water to the Saticoy Spreading Grounds.

Project No. 3 would use the existing monitoring network to evaluate improved groundwater conditions.

3.1.2.3.2 Benefits and Impacts of Project No. 3

Realized Benefits

Since adoption of the GSP, the project proponents have not actively developed this project.

Expected Benefits

As described in the GSP, the Riverpark–Saticoy GRRP Recycled Water Project is expected to benefit the Subbasin by providing the infrastructure to take recycled wastewater from the AWPF and for groundwater recharge (FCGMA 2018). Currently, this water is being discharged to the Pacific Ocean. The Riverpark–Saticoy Pipeline and the GRRP will help ensure that excess flows from the AWPF will be used for groundwater recharge. In addition, the product water from the AWPF is of higher quality than groundwater in the Oxnard Forebay. Therefore, by using this water to recharge groundwater in the Forebay, implementation of the GRRP Recycled Water Project is expected to improve groundwater quality in the Forebay (FCGMA 2018).

Impacts to beneficial uses and users

The Riverpark–Saticoy GRRP would increase sustainable yield in the Subbasin by increasing groundwater recharge, and thus have a positive impact on beneficial uses and users. Project impacts are intended to increase sustainable yield for all users.

3.1.2.4 Project No. 4: Freeman Diversion Expansion Project

3.1.2.4.1 Description of Project No. 4

UWCD currently operates the Freeman Diversion on the Santa Clara River, which diverts surface water flows from the river into groundwater recharge facilities in the Oxnard Forebay and directs surface-water deliveries to growers via UWCD's and PVCWD's pipelines to be used in lieu of groundwater pumping. In recent years, more restrictive environmental regulations have lessened the amount of Santa Clara River surface water available that can be diverted at the Freeman Diversion. The Freeman Diversion Expansion Project proposes to construct facilities capable of diverting surface water at higher flow rates and with higher sediment loads than currently possible. Use of flows with higher sediment loads, which are less conducive to fish migration, has been encouraged by both regulatory agencies and non-governmental organizations (FCGMA 2019). The expansion project has advanced since the GSP was submitted to DWR. This project description reflects the updated understanding of the project based on work that was completed since 2018.

This project requires expansion of the existing intake, conveyance, and recharge facilities associated with Freeman Diversion and, in a subsequent phase, an associated increase in UWCD's right to divert surface water from the Santa Clara River from 375 cubic feet per second to 750 cubic feet per second instantaneous flow during periods of peak flow in the river. When constructed, this project will result in additional recharge and conjunctive use of flood/storm flows in both Oxnard and Pleasant Valley Basins. UWCD will improve fish passage and implement a new Multi-Species Habitat Conservation Plan, concurrent with this project.

Increased volume of diverted water will be used for artificial recharge and conjunctive use via the Pumping Trough Pipeline (PTP) in the Subbasin. Benefits will include higher groundwater levels, more groundwater in storage, reduced potential for seawater intrusion and land subsidence, and improved groundwater quality. The project will improve groundwater quality in the Forebay because the diverted surface water is of higher chemical quality (i.e., lower TDS) than the groundwater. Historical data show a direct relationship between diversion and recharge rates with groundwater quality at several water-supply wells in the Forebay. The areas served by the PTP and Pleasant Valley Pipeline (PVP) will receive additional surface-water deliveries for conjunctive use, reducing pumping and increasing groundwater elevations. Higher groundwater elevations will reduce the potential for subsidence related to groundwater production in the Subbasin.

Some components of this project have been designed or are constructed already. Next-step project components include expansion of existing conveyance structures (inverted siphon, 3-barrel culvert, and extension of the conveyance system to connect to UWCD's new Ferro-Rose spreading basin via a new undercrossing at Vineyard Ave.

Project No. 4 uses the existing monitoring network to evaluate improved groundwater conditions.

3.1.2.4.2 Benefits And Impacts of Project No. 4

Realized Benefits

UWCD is currently expanding and extending existing conveyance structures and connections to the Ferro-Rose recharge basin to allow for more recharge and increase diversions, within their existing water rights, from the Santa Clara River. This construction is a key component of the Freeman Diversion Expansion Project and is described in more detail in Section 3.2.1.

Expected Benefits

Increased volume of diverted water will be used for artificial recharge and conjunctive use via the PTP in the Subbasin. Benefits will include higher groundwater levels, more groundwater in storage, reduced potential for seawater intrusion and land subsidence, and improved groundwater quality. The project will improve groundwater quality in the Forebay because the diverted surface water is of higher chemical quality (i.e., lower TDS) than the groundwater. Historical data show a direct relationship between diversion and recharge rates with groundwater quality at several water-supply wells in the Forebay. The areas served by the PTP and PVP will receive additional surface-water deliveries for conjunctive use, reducing pumping and increasing groundwater elevations. Higher groundwater elevations will reduce the potential for subsidence related to groundwater production in the Subbasin.

Impacts to beneficial uses and users

The Freeman Diversion Expansion Project will increase sustainable yield in the Subbasin, and thus have a positive impact on beneficial uses and users.

3.1.2.5 Project No. 5: Voluntary Temporary Agricultural Land Fallowing

3.1.2.5.1 Description of Project No. 5

The Voluntary Temporary Agricultural Land Fallowing Project would use replenishment fees to temporarily fallow agricultural land (FCGMA 2018). This would result in decreased groundwater production on the parcels or ranches that are fallowed, and an overall reduction in groundwater demand in the Subbasin. Parcels or ranches in areas susceptible to seawater intrusion would be targeted with this project (FCGMA 2018).

Project No. 5 would use the existing monitoring network to evaluate improved groundwater conditions.

3.1.2.5.2 Benefits and Impacts of Project No. 5

Realized Benefits

This project is conceptual; thus, benefits have not yet been realized.

Expected Benefits

Temporary fallowing is a quick way to reduce demand with no capital costs or infrastructure needed. Because it is inexpensive, it is envisioned that voluntary temporary fallowing could be implemented, while other long-term solutions are investigated and implemented. The Voluntary Temporary Agricultural Land Fallowing Project will benefit the Subbasin by mitigating seawater intrusion in the Subbasin. This project would be utilized in conjunction with other projects and management actions to reduce the groundwater demand in the Subbasin.

Impacts to beneficial uses and users

Voluntary Temporary Agricultural Land Fallowing will increase groundwater elevations in the Subbasin, and thus have a positive impact on beneficial uses and users.

3.2 Newly Identified Projects and Management Actions

FCGMA and other agencies in the Subbasin have undertaken significant efforts to identify, evaluate, fund, and implement additional projects in the Subbasin that increase water supplies in the Subbasin and support GSP implementation. These projects were not included in the GSP. A portion of these projects were incorporated into the GSP list of projects for grant eligibility through the 2021 GSP Annual Report for the Subbasin (FCGMA 2022), and a portion of these projects were identified through FCGMA's new project evaluation process. These projects are summarized below and in Table 3-2, Summary of New Projects and Management Actions.

3.2.1 Project No. 6: Ferro-Rose Artificial Recharge of Groundwater

3.2.1.1 Description of Project No. 6

Project No. 6 is a key component of the Freeman Expansion Project. It involves expansion and extension of existing conveyance structures (inverted siphon and 3-barrel culvert) and connection to Ferro-Rose basin (Vineyard Ave. crossing) to allow for more recharge and to increase diversions, within the limits of UWCD's existing water right, from the Santa Clara River during high-flow events when suspended sediment concentrations are high.

Increased volume of diverted water will be used for artificial recharge and conjunctive use via the PTP in Subbasin, and a smaller amount for conjunctive use via the PVP in PVB.

Project No. 6 uses the existing monitoring network to evaluate improved groundwater conditions.

Table 3-2. Summary of New Projects and Management Actions

Number	Name	Description	Status	Expected Schedule	Benefits Observed to Date	Estimated Accrued Benefits at Completion
Projects						
6	Ferro-Rose Artificial Recharge of Groundwater	Expansion and extension of conveyance structures to allow for increased diversion of Santa Clara River water	Under Construction	Completion by end of 2024	N/A	Increase in sustainable yield by approximately 2,000 – 3,000 AFY.
7	Laguna Road Recycled Water Pipeline Interconnection	New pipeline interconnection to convey recycled water from PVCWD's system to UWCD's PTP	Under construction	▪ Phase 1 completion 2025. ▪ Phase 2 completion 2027	N/A	Increase in sustainable yield of Oxnard Subbasin by approximately 1,500 AFY. Reduced energy consumption for pumpers.
8	Extraction Barrier and Brackish Water Treatment	Seawater intrusion barrier formed by extracting brackish near Point Mugu	Preliminary design in project	▪ Phase 1 completion 2028. ▪ Phase 2 completion 2031	N/A	Potential increase in sustainable yield of the Oxnard Subbasin by more than 10,000 AFY.
9	Purchase of Supplemental State Water Project Water	Purchase supplemental SWP water for recharge in the Oxnard Subbasin and delivery to users via the PTP and PVP	Ongoing	Immediate	25,000 AF of imported water between 2019 and 2021	Increase in combined sustainable yield of the Oxnard Subbasin and PVB by 6,000 AFY. Reduced energy consumption for pumpers.
10	Destruction of Abandoned Wells	Destroy abandoned wells to reduce cross-connection and contamination across multiple aquifers	Conceptual	First phase, 2027	N/A	Improved groundwater quality

Table 3-2. Summary of New Projects and Management Actions

Number	Name	Description	Status	Expected Schedule	Benefits Observed to Date	Estimated Accrued Benefits at Completion
Projects						
11	Seawater Injection Barrier Feasibility Study	Feasibility study to evaluate potential benefits of freshwater injection wells installed in targeted areas of the Oxnard coastline	Conceptual	Not Defined	N/A	N/A
12	Installation of Transducers in Groundwater Monitoring Wells	Improved data collected and characterization of groundwater conditions at key wells	Preliminary design in process	Not defined	N/A	Improved data collection and understanding of groundwater conditions, resulting in improved management of the Subbasin.
13	Naumann-Hueneme Road Recycled Water Pipeline Interconnection	New pipeline interconnection to allow conveyance of recycled water from PVCWD's system to UWCD's PTP. Alternative to, or supplement for, Laguna Road Recycled Water Pipeline interconnection.	Preliminary design in process	2028-2029	N/A	Increased sustainable yield of Oxnard Subbasin by 1,500 AFY. Reduced energy consumption for pumpers.
14	Installation of Multi-Depth Monitoring Wells	Installation of monitoring wells in the Subbasin to assess groundwater conditions in areas that lack data.	Ongoing	Completion by the end of 2024	Two wells installed along Revolon Slough in the Oxnard Pumping Depression Management Area. Additional monitoring wells	Improved data collection and understanding of groundwater conditions, resulting in improved management of the Subbasin.

Table 3-2. Summary of New Projects and Management Actions

Number	Name	Description	Status	Expected Schedule	Benefits Observed to Date	Estimated Accrued Benefits at Completion
Projects						
					planned for construction near boundary with LPVB and in the EOPMA	
15	Installation of 3 Shallow Monitoring Wells	Installation of monitoring wells along the Revolon Slough, Calleguas Creek, and Santa Clara River.	Ongoing	Ongoing	Two shallow monitoring wells planned for completion in 2024 along Santa Clara River and Revolon Slough.	Improved data collection and understanding of groundwater conditions, resulting in improved management GDEs in the Subbasin.
16	ASR Wells and Recycled Water Storage	The design and construction of multiple ASR wells for injection/extraction and the storage of AWPF water.	Initial feasibility study complete and pilot program under development.	Estimated completion by 2033.	N/A	Increase in the sustainable yield of the Subbasin, dependent on additional projects that utilized AWPF water.
17	Recycled Water Seawater Injection Barrier	The design and construction of seawater injection barrier wells that would be used as part of the City of Oxnard's proposed ASR program.	This project is conceptual.	Not defined.	N/A	Increase in the sustainable yield of the Subbasin; dependent on additional projects that utilized AWPF water
18	Optimization of Groundwater Pumping Distribution Feasibility Study	Feasibility study to evaluate the benefits, and infrastructure requirements, to shift pumping out of the	This project is conceptual	Not defined.	N/A	Additional information to support the evaluation of projects that shift pumping across the Subbasin in

Table 3-2. Summary of New Projects and Management Actions

Number	Name	Description	Status	Expected Schedule	Benefits Observed to Date	Estimated Accrued Benefits at Completion
Projects						
		Saline Intrusion and Oxnard Pumping Depression management areas				an effort to mitigate seawater intrusion and maximize sustainable yield.

Notes: AFY = acre-feet per year; AF = acre-feet; GDE = Groundwater Dependent Ecosystem; SWP = State Water Project; PVCWD = Pleasant Valley County Water District; UWCD = United Water Conservation District; PTP = Pumping Trough Pipeline; PVP = Pleasant Valley Pipeline; ASR = Aquifer Storage and Recovery; AWPF = Advanced Water Purification Facility

3.2.1.2 Benefits and Impacts of Project No. 6

Realized Benefits

UWCD received funding to begin infrastructure improvements for the Ferro-Rose recharge basin through DWR's Sustainable Groundwater Management Grant Program's. Construction will be completed in 2024.

Expected Benefits

Expected benefits include higher groundwater levels, additional groundwater in storage, improved groundwater quality, which occurs as a result of the higher quality surface water used for recharge, and reduced potential for seawater intrusion or land subsidence in both the Subbasin and the PVB.

Impacts to beneficial uses and users

Ferro-Rose Artificial Recharge of Groundwater will increase sustainable yield in the Subbasin, and thus have a positive impact on beneficial uses and users. Project impacts are intended to increase sustainable yield for all users.

3.2.2 Project No. 7: Laguna Road Recycled Water Pipeline Interconnection

3.2.2.1 Description of Project No. 7

The Laguna Road Recycled Water Pipeline Interconnection is a new pipeline interconnection to allow conveyance of recycled water from PVCWD's system to UWCD's PTP system to allow full utilization of available recycled water.

Project No. 7 uses the existing monitoring network to evaluate improved groundwater conditions.

3.2.2.2 Benefits and Impacts of Project No. 7

Realized Benefits

This project is currently under construction; thus, benefits have not yet been realized.

Expected Benefits

Benefits of using more recycled water in the PTP system will include higher groundwater levels, more groundwater in storage, improved groundwater quality, and reduced potential for seawater intrusion or land subsidence in the Subbasin. This project will reduce pumping and the potential for migration of high-TDS water into the aquifers. The PTP area will receive recycled water for agricultural use, reducing pumping in those areas, which will increase groundwater elevations and improve groundwater quality, while reducing potential for subsidence. The PTP area will receive the most direct and immediate benefit.

Impacts to beneficial uses and users

The Laguna Road Recycled Water Pipeline Interconnection will increase sustainable yield in the Subbasin, and thus have a positive impact on beneficial uses and users. Project impacts are intended to increase sustainable yield for all users.

3.2.3 Project No. 8 Extraction Barrier and Brackish Water Treatment

3.2.3.1 Description Of Project No. 8

This project is intended to create a seawater intrusion barrier in the Subbasin, near Point Mugu, by extracting brackish groundwater in the Oxnard and Mugu aquifers near the coast and maintaining a pumping trough that helps prevent landward migration of seawater. Creation of a barrier to seawater intrusion will increase the sustainable yield of the Subbasin and may influence water levels in the adjacent PVB. In addition, this project will (1) produce treated brackish water for municipal and industrial use, agricultural use, and/or artificial recharge from currently unusable portions of the aquifers and (2) reduce the area and volume of the aquifers that are currently contaminated with seawater, thereby increasing storage capacity for fresh water.

Project components include construction of: (1) extraction barrier wells near Mugu Lagoon, (2) a reverse-osmosis treatment plant, and (3) a conveyance system for distribution of treated water. The brackish groundwater extracted in the Point Mugu area will be treated for beneficial use, including artificial recharge and/or direct delivery to water users (e.g., PTP, PVP). Benefits will include limiting further seawater intrusion, reversing the impacts of seawater intrusion in localized areas, increasing the groundwater storage capacity, raising groundwater elevations (primarily, but not exclusively, in the LAS), and areas where the treated water is provided, such as coastal areas, the Forebay, PVP, and PTP.

The project is envisioned to be advanced in multiple phases. The design phase of the project includes construction of monitoring well clusters and data collection in the vicinity of the proposed project site to aid in optimizing the project design. The monitoring well clusters will be used to collect groundwater quality and level data from the aquifers that will be pumped as part of the extraction barrier, as well as the semi-perched aquifer. The data collected from these wells will be used to: 1) refine understanding of horizontal and vertical conductivity of the aquifers and confining layers, to aid in design of the extraction wellfield; 2) provide additional data regarding geochemistry of the aquifers that will be pumped as part of the extraction; and 3) assess whether contaminants in some shallow portions of the semi-perched aquifer are likely to migrate toward the extraction wells, now or in the future. Additionally, Phase 1 will include construction and operation of approximately 10 groundwater extraction wells that operate at an average annual production rate of approximately 3,500 AFY.

The first phase of the project includes design and construction of seven (7) extraction wells. The field will be operated to produce an average of approximately 3,500 AFY in total. The second phase of the EBB project is the design and construction of the treatment plant, the conveyance system for treated water distribution, and a connection to Calleguas Salinity Management Pipeline for reverse osmosis brine discharge.

Other supporting activities include additional groundwater modeling (e.g., of barrier concepts for the Port Hueneme area), geophysical studies, and operation of a pilot-scale extraction/treatment system that will help refine the extent of extraction and treatment needs.

An additional monitoring network and monitoring plan is currently under development for Project No. 8.

3.2.3.2 Benefits And Impacts of Project No. 8

Realized Benefits

This project is currently in design and permitting; thus, benefits have not yet been realized.

Expected Benefits

This project should aid with achievement of measurable objectives and minimum thresholds for four out of six sustainability criteria by blocking seawater intrusion near the coast, raising groundwater elevations in the Forebay, improving groundwater quality, and increasing fresh groundwater in storage in the aquifers (replacing the existing intruded seawater). The project anticipates increasing the combined annual sustainable yield of the Subbasin and PVB, considering both the quantity of treated brackish water supplied by the project and the effects on sustainable yield resulting from mitigating existing and future seawater intrusion.

Impacts to beneficial uses and users

The Extraction Barrier and Brackish Water Treatment Project will increase sustainable yield in the Subbasin, and thus have a positive impact on beneficial uses and users. Project impacts are intended to increase sustainable yield for all users.

3.2.4 Project No. 9: Purchase of Supplemental State Water Project Water

3.2.4.1 Description Of Project No. 9

This project proposes purchasing supplemental State Water Project (State Water) water for recharge in the Subbasin and delivery to users on PTP and PVCWD systems in years when the State Water is available and willing participants can be found to execute a water transfer. “Supplemental” refers to State Water purchased, exchanged, or transferred for use in the Subbasin and PVB, in excess of UWCD’s Table A allocation, which is 3,150 AFY (in an average year, only about 60 percent of allocated State Water is actually delivered by DWR). The annual volume of State Water transfers that can be purchased will depend on the volume available and the price that UWCD and other Ventura County agencies are willing to pay. UWCD anticipates that over the long-term approximately 6,000 AFY of supplemental State Water imports will be available at the Freeman Diversion for use within the Subbasin and PVB (UWCD 2021c).

Project No. 9 uses the existing monitoring network to evaluate improved groundwater conditions.

3.2.4.2 Benefits And Impacts of Project No. 9

Realized Benefits

Importation of supplemental State Water has already begun. In 2019, FCGMA funded UWCD’s purchase of 15,000 AF of supplemental State Water for recharge in the Subbasin. Between 2019 and 2023, UWCD purchased an additional 29,329 AF of supplemental State Water (transfers, exchanges and Article 21 water). This water was released from Lake Piru and Castaic Lake for recharge in the Santa Clara River Valley basins (Piru, Fillmore and Santa Paula) and for recharge and delivery in the Oxnard Subbasin and PVB. Realized benefits are an increase in groundwater elevations as a result of recharge in the Forebay and a reduction in groundwater pumping as a result of surface water deliveries for use in-lieu of groundwater.

Expected Benefits

This project anticipates increasing the combined sustainable yield of the Subbasin and the PVB by approximately 6,000 AFY.

Impacts to beneficial uses and users

The Purchase of Supplemental State Water Project Water will increase sustainable yield in the Subbasin, and thus have a positive impact on beneficial uses and users. Project impacts are intended to increase sustainable yield for all users.

3.2.5 Project No. 10: Destruction of Abandoned Wells

3.2.5.1 Description of Project No. 10

This project proposes identifying and destroying abandoned wells in the Subbasin to reduce the cross-connection provided by wells screened across multiple aquifers. There are three primary concerns with these wells. First, inland from the Point Mugu, abandoned private wells may act as a conduit for seawater that has intruded the units of the UAS to migrate downward into the LAS. Second, abandoned wells in the semi-perched aquifer may provide pathways for groundwater with high chloride concentrations to migrate into the UAS and negatively impact the water quality of the Oxnard and Mugu aquifers. Third, the GSP determined that groundwater elevations that are higher than the minimum threshold groundwater elevations in the UAS and LAS adjacent to the coast may result in a return to artesian conditions in the confined aquifers. Abandoned wells can act as conduits for flow from the aquifer systems to land surface.

Because of the existing impacts to groundwater quality and the potential future impacts to infrastructure from abandoned wells, these wells need to be destroyed properly to achieve sustainable management of the groundwater conditions in the Subbasin. The initial phase of this project would address private wells inland from the Point Mugu. Subsequent phases would identify and address coastal wells and wells that allow leakage from the semi-perched aquifer to the UAS.

Project No. 10 would use the existing monitoring network to evaluate improved groundwater conditions.

3.2.5.2 Benefits and Impacts of Project No. 10

Realized Benefits

This project is currently in the planning stage; thus, benefits have not yet been realized.

Expected Benefits

The quantifiable benefits of this project will be in improved water quality in the LAS in the vicinity of Point Mugu, by preventing migration of poor-quality groundwater from the UAS to the LAS. Secondarily, the project will provide an improved understanding of groundwater conditions in each of the principal aquifers by limiting vertical migration of groundwater. Later phases of this project will help limit future infrastructure expenditures to resolve issues that may arise when the groundwater levels in the confined aquifers recover to elevations that will restore artesian conditions on the Oxnard Plain.

Impacts to beneficial uses and users

The Destruction of Abandoned Wells Project will reduce inter-aquifer flow and improve water quality for beneficial uses and users. Project impacts are intended to improve water quality for all users.

3.2.6 Project No. 11 Seawater Injection Barrier Feasibility Study

3.2.6.1 Description of Project No. 11

Seawater intrusion, which primarily occurs in the vicinity of Point Mugu and Port Hueneme, is the primary sustainability indicator that causes undesirable results in the Subbasin. This project would prevent seawater intrusion in these targeted areas of the Oxnard coastline through installation of a network of injection wells to increase groundwater elevations at the coastline and reverse the landward gradient in the lower aquifer system by creating a ridge of freshwater within the affected aquifers. This project is in the early stages of development, though preliminary groundwater modelling suggests that in the LAS, installation of 5 to 10 injection wells landward of the eastern edge of the existing seawater intrusion front, injecting a total of 2,400 AFY, has the potential to eliminate any further inland migration of seawater in the FCA. This type of seawater barrier has been used, successfully, to prevent seawater intrusion in the West Coast Basin and the Orange County Groundwater Basin. Water supplied to the injection wells in these areas comes from a combination of advanced treated recycled water and imported water. Additional modeling needs to be done to assess: (1) the feasibility of an injection barrier in the LAS, (2) the potential volume and sources of water available to inject, (3) the volume of injected water that would be recovered by inland wells, (4) the feasibility of implementing this project along with the seawater extraction barrier project proposed for the Point Mugu area, and (5) the infrastructure requirements, cost, and feasibility of constructing the project and delivering water to stakeholders west of injection barrier.

This project will be evaluated concurrently with Project No. 17, Recycled Water Seawater Intrusion Barrier. Project No. 11 uses the existing monitoring network to evaluate improved groundwater conditions.

3.2.6.2 Benefits and Impacts of Project No. 11

Realized Benefits

This project is a feasibility study and has not been initiated.

Expected Benefits

This project is a feasibility study so expected benefits are a greater understanding of (1) the feasibility of an injection barrier in the LAS, (2) the potential volume and sources of water available to inject, (3) the volume of injected water that would be recovered by inland wells, (4) the feasibility of implementing this project along with the seawater extraction barrier project proposed for the Point Mugu area, and (5) the infrastructure requirements, cost, and feasibility of constructing the project and delivering water to stakeholders west of injection barrier.

If this project is found to be feasible and is constructed, groundwater elevations will rise in the vicinity of the injection barrier and the minimum thresholds defined in the GSP will be re-evaluated and may be changed to reflect the new groundwater conditions under which the Subbasin could be managed sustainably.

Impacts to beneficial uses and users

The Seawater Injection Barrier Feasibility Study is a paper study, so the impacts to beneficial uses and users will be neutral. If the project is found to be feasible and is constructed, it will increase sustainable yield in the Subbasin, and thus have a positive impact on beneficial uses and users. Project impacts are intended to increase sustainable yield for all users.

3.2.7 Project No. 12: Installation of Transducers in Groundwater Monitoring Wells

3.2.7.1 Description of Project No. 12

This project proposes installation of transducers in groundwater monitoring wells to collect long-term groundwater elevation records in the Subasin. The GSP determined that there were often temporal data gaps in the understanding of aquifer conditions. These data gaps limit the number of wells that can be used to contour spring high and fall low groundwater conditions. The temporal data gaps have persisted in reporting groundwater levels in storage for the annual reports prepared after the GSP was submitted to DWR. Additionally, as most key wells are agricultural irrigation wells, transducers will help assure that measured water levels are actual static water levels unaffected by recovery or potential well interference.

Installing transducers in the groundwater monitoring network will help ensure that spring high and fall low water levels are collected from the key wells within a 2-week window, as recommended by DWR while providing agency staff with additional scheduling flexibility. Agency staff can collect manual groundwater elevations from wells without pressure transducers during the 2-week monitoring window, and then download the pressure transducer data when the schedule permits, to collect a complete set of groundwater elevations in the fall and spring of each water year. Ultimately, these data will provide a clearer understanding of groundwater conditions during the spring and fall measurement events, allow a better comparison for annual change in storage estimates, and facilitate improved management of the Subbasin.

Installation of transducers in irrigation wells may include the need to modify wellheads, install sounding tubes below turbine pump bows, and modify agreements with well owners to make these modifications.

3.2.7.2 Benefits and Impacts of Project No. 12

Realized Benefits

This project has not been implemented.

Expected Benefits

The expected benefits of this project lie in the collection of data from a 2-week window each spring and fall and the ongoing monitoring of the groundwater conditions at the well sites including a better understanding of potential well interference and non-static conditions on water-level measurements. The data collected can be used to make better management decisions depending on the observed groundwater conditions.

Impacts to beneficial uses and users

This project does not have a direct impact on beneficial uses and users. It will, however, provide data that can be used to help evaluate and potentially revise the measurable objectives in the future.

3.2.8 Project No. 13: Nauman-Hueneme Road Recycled Water Pipeline Interconnection

3.2.8.1 Description of Project No. 13

This project is a new pipeline interconnection to allow conveyance of recycled water from Oxnard's AWPF system, at Hueneme Road, to UWCD's Pumping Trough Pipeline (PTP) system to allow full utilization of available recycled water. This project is a potential alternative to, or supplement for, the Laguna Road Recycled Water Pipeline interconnection (Project No. 7). The PTP area is expected to receive the most direct and immediate benefit from this project. Benefits of using more recycled water in the PTP system include higher groundwater levels, more groundwater in storage, improved groundwater quality, and reduced potential for seawater intrusion or land subsidence in the Subbasin.

Project No. 14 uses the existing monitoring network to evaluate improved groundwater conditions.

3.2.8.2 Benefits and Impacts of Project No. 13

Realized Benefits

This project is currently in preliminary design. Thus, project benefits have not yet been realized.

Expected Benefits

This project should aid with achievement of measurable objectives and minimum thresholds for five out of six sustainability indicators. This project will help raise groundwater levels, which will reduce the landward gradient that induces seawater intrusion near the coast, increase the volume of groundwater in storage, improve groundwater quality, and reduce the potential for land subsidence related to groundwater withdrawals. Higher groundwater levels will also reduce pump lift, and therefore energy consumption, for municipal and agricultural pumpers. The project anticipates increasing the annual sustainable yield of the Subbasin by approximately 1,500 AFY on average. The additional yield to the Subbasin will not double if both the Nauman-Hueneme Road and the Laguna Road Pipeline projects are both implemented, however building both projects may provide some supplemental yield over building just one of the two.

Impacts to beneficial uses and users

The Nauman-Hueneme Road Recycled Water Pipeline Interconnection will increase sustainable yield in the Subbasin, and thus have a positive impact on beneficial uses and users. Project impacts are intended to increase sustainable yield for all users.

3.2.9 Project No. 14: Installation of Multi-Depth Monitoring Wells

3.2.9.1 Description of Project No.14

This project proposes installation of multi-depth monitoring wells in the Subbasin to assess groundwater conditions in the principal aquifers in areas of the Subbasin that lack data. The GSP determined that there were spatial data gaps in the understanding of aquifer conditions and identified 11 potential new well locations that would help fill the gaps identified. High-priority potential new well locations are located near the boundary with the LPVB, along the boundary with PVB, and in the West Oxnard Plain Management Area (FCGMA 2019).

In addition, a new well in the East Oxnard Plain Management Area (EOPMA) will help define conditions in an area of the Subbasin that does not currently have any monitoring wells. Groundwater levels to the west of the Bailey Fault are currently used as a proxy for conditions to the east of the fault. The addition of multi-depth monitoring wells, completed in each of the principal aquifers in this location, will help refine the understanding of groundwater flow directions and vertical gradients in the EOPMA.

3.2.9.2 Benefits and Impacts of Project No.14

Realized Benefits

Since the GSP was submitted to DWR, a multi-depth monitoring well cluster was installed adjacent to the Revolon Slough, within the Oxnard Pumping Depression Management Area. This well was installed through the DWR Technical Support Services program. This well helps to address a high priority data gap identified in the GSP and was completed to monitor all five principal aquifers. In addition, with support from DWR through their Sustainable Groundwater Management grant program, FCGMA is currently constructing nested monitoring wells near the boundary with the LPVB and in the Pumping Depression Management Area. These wells are anticipated to be completed in the 2024 calendar year.

Expected Benefits

The expected benefits of this project lie in the additional hydrogeologic conceptual model data gathered from the well installation process and the ongoing monitoring of the groundwater conditions at the well sites. These data will be used to refine the conceptual and numerical models of the Subbasin. Such refinement may result in reevaluation and adjustment of the minimum thresholds or measurable objectives.

Impacts to beneficial uses and users

The installation of multi-depth monitoring wells will improve data collection and management of groundwater resources for beneficial uses and users. Projects impacts are intended to benefit all users.

3.2.10 Project No.15: Installation of 3 Shallow Monitoring Wells

3.2.10.1 Description of Project No.15

This project proposes installation of shallow monitoring wells to assess groundwater conditions along the Revolon Slough, Calleguas Creek, and the Santa Clara River. The GSP determined that there was a data gap in the understanding of how surface water and shallow groundwater interact with the deeper primary aquifers in the Subbasin. DWR also identified “investigation of the hydraulic connectivity of the surface water bodies to the shallow aquifer and principal aquifers” as a recommended corrective action that should be addressed before the periodic evaluation of the Subbasin GSP. Shallow groundwater monitoring wells will be used to help understand the relationship between surface water and groundwater along the stream courses. Data from the construction of the wells will help define aquifer properties in the semi-perched aquifer and Oxnard aquifer, and data on groundwater conditions in these wells will be used to help assess groundwater gradients that may influence the source of water for GDEs.

3.2.10.2 Benefits and Impacts of Project No.15

Realized Benefits

FCGMA, with support from DWR through their Sustainable Groundwater Management grant program, is currently constructing three shallow monitoring wells in the Subbasin: one near Santa Clara River, one near Revolon Slough, and one near Calleguas Creek. These wells are anticipated for completion in the 2024 calendar year.

Expected Benefits

The expected benefits of this project lie in the additional data gathered from the well installation process and the ongoing monitoring of the groundwater conditions at the well sites. This data can be used to refine the conceptual and numerical models of the Subbasin. Such refinement may result in reevaluation and adjustment of the minimum thresholds or measurable objectives associated with GDEs.

Impacts to beneficial uses and users

The installation of shallow monitoring wells will improve data collection and management of groundwater resources for beneficial uses and users. Projects impacts are intended to benefit all users.

3.2.11 Project No.16: ASR Wells and Recycled Water Storage

3.2.11.1 Description of Project No.16

The Aquifer Storage and Recovery (ASR) Expansion Project proposed by the City of Oxnard is a Seawater Intrusion Barrier generally located along a northwest to southeast alignment in the vicinity of Hueneme Road and Pacific Coast Highway. This project was considered as part of Phase 2 of the AWPF Expansion Project and was included in the Program Environmental Impact Report (PEIR) developed by CH2MHill for the City in 2004. The PEIR contains detailed descriptions and analyses of AWPF Program Phases 1 and 2. Section 2.4.4 of the PEIR Volume 1 includes an overall description of the Project, and Sections 4.6.3.1.2 and 4.6.3.3.2 describe the modeling and proposed operation respectively. Recycled water would be conveyed to the ASR wells via the recycled water delivery system along Hueneme Road and a new ASR well Conveyance Pipeline constructed along Pacific Coast Highway. Individual Coastal ASR Well Laterals would be constructed from the main conveyance pipelines to distribute water to each well. Water injected into the coastal aquifers would act as a focused seawater intrusion barrier, create a new water supply for the basin to mitigate overdraft conditions and would generate groundwater storage that could be extracted from the Oxnard Forebay. Stored water generated from the Project would be pumped for potable use from the north Oxnard Plain using City wells.

3.2.11.2 Benefits and Impacts of Project No.16

Realized Benefits

The City of Oxnard is currently designing a pilot study of the proposed ASR project. Benefits of the project have not yet been realized.

Expected Benefits

Modeling results from the PEIR suggests the likelihood of “very large increases in groundwater elevations along the coastal injection wells” and that the project would “significantly help to decrease the severe overdraft conditions…”. This project would operate as part of Project No. 2, AWPF Facility Improvements Phase II.

Impacts to beneficial uses and users

Increases in groundwater elevations associated with implementation of this project is expected to benefit all groundwater uses and users in the Subbasin.

3.2.12 Project No.17: Recycled Water Seawater Injection Barrier Project

3.2.12.1 Description of Project No.17

The Oxnard Recycled Water Seawater Injection Barrier Project proposed by the City of Oxnard is a Seawater Intrusion Barrier generally located along a northwest to southeast alignment in the vicinity of Hueneme Road and Pacific Coast Highway. This project was considered as part of Phase 2 of the GREAT program and was included in the PEIR developed by CH2MHill for the City of Oxnard in 2004. The PEIR contains detailed descriptions and analyses of GREAT Program Phases 1 and 2. Section 2.4.4 of the PEIR Volume 1 includes an overall description of the Project and Section 4.6.3.1.2 and 4.6.3.3.2 describe the modeling and proposed operation respectively. Recycled water would be conveyed to the ASR wells via the recycled water delivery system along Hueneme Road and a new ASR well Conveyance Pipeline constructed along Pacific Coast Highway. Individual Coastal ASR Well Laterals would be constructed from the main conveyance pipelines to distribute water to each well. Water injected into the coastal aquifers would act as a focused seawater intrusion barrier, create a new water supply for the basin to mitigate overdraft conditions and would generate groundwater storage that could be extracted from the Oxnard Forebay. Stored water generated from the project would be pumped for potable use from the north Oxnard Plain using City wells.

3.2.12.2 Benefits and Impacts of Project No. 17

Realized Benefits

This project is conceptual – benefits have not been realized.

Expected Benefits

Modeling results from the PEIR suggests the likelihood of "very large increases in groundwater elevations along the coastal injection wells" and that the project would "significantly help to decrease the severe overdraft conditions." This project would operate as part of Project No. 2, AWPF Facility Improvements Phase II.

Impacts to beneficial uses and users

Increases in groundwater elevations associated with implementation of this project is expected to benefit all groundwater uses and users in the Subbasin.

3.2.13 Project No. 18 Optimization of Groundwater Pumping Distribution Feasibility Study

3.2.13.1 Description of Project No. 18

Results from numerical modeling performed during GSP implementation, and as part of this periodic evaluation, indicate that the sustainable yield of the Subbasin, PVB, and WLPMA could be increased by shifting pumping out of the Saline Intrusion and Oxnard Pumping Depression Management Areas to the Forebay and/or West Oxnard Plain Management Areas (see Section 5.2). Additional analysis needs to be done to assess: (1) the feasibility of implementing this project alongside other large capital projects proposed in the Subbasin, and (2) the infrastructure and costs required to deliver water to users in the Subbasin that are impacted by localized pumping reductions.

3.2.13.2 Benefits and Impacts of Project No. 18

Realized Benefits

This project is a feasibility study and has not been initiated.

Expected Benefits

This project is a feasibility study so expected benefits are a greater understanding of (1) the sustainable yield increase associated with re-distributing groundwater pumping, (2) the feasibility of, and need for, implementing this alongside other large capital projects in the Subbasin, and (3) the infrastructure and cost requirements to deliver water to those impacted by local pumping reductions.

Impacts to beneficial uses and users

The Optimization of Groundwater Pumping Distribution Feasibility Study is a paper study, so the impacts to beneficial uses and users will be neutral.

3.3 Process for Public Notice and Engagement

To facilitate funding, implementation, and integration into the GSP modeling, FCGMA developed a formal process for evaluating, ranking, and prioritizing projects within the Subbasin. This project evaluation process was developed under the guidance of the FCGMA Board of Directors' Operations Committee, with participation by other agencies and interested in the Subbasin. The project evaluation process includes set of evaluation criteria, guidelines, and policies for vetting, adding, and prioritizing projects. FCGMA adopted the project prioritization process and solicited the first found of project information from agencies in the Subbasin in September 2023. The adoption of this process provides interested parties and other agencies in the Subbasin with the opportunity to submit new or updated project information for consideration in the GSP to FCGMA on an annual basis.

4 Basin Setting Review

This section of the report evaluates the Basin Setting described in the GSP, including the Hydrogeologic Conceptual Model (Section 4.1); and water supplies, land uses, and water budgets over the evaluation period (Section 4.2).

4.1 Hydrogeologic Conceptual Model

Groundwater in the Subbasin occurs in six aquifers: the semi-perched aquifer, and the Oxnard, Mugu, Hueneme, Fox Canyon, and Grimes Canyon aquifers. Five of these six aquifers are principal aquifers and are grouped into a UAS and Lower Aquifer System (LAS). The UAS comprises the Oxnard and Mugu aquifers, which consist of recent to upper Pleistocene- and Holocene-age alluvial deposits. The LAS comprises of the Hueneme, Fox Canyon, and Grimes Canyon aquifers, which consist of middle to lower Pleistocene-age marine and nonmarine sediments. Groundwater production from the Subbasin has induced seawater intrusion in both the UAS and LAS.

Since adoption of the GSP, FCGMA and other agencies in the Subbasin have designed, scoped, and implemented new hydrogeologic investigations, projects, and technical studies that improve understanding of the hydrogeologic conceptual model of the Subbasin. These investigations have focused on improving understanding of the relationship between groundwater extractions, groundwater levels, and seawater intrusion. This section summarizes: (i) new information and data gathered from these projects and studies, and (ii) the improved understanding of local hydrogeologic conditions within the Subbasin.

4.1.1 New Information and Data

4.1.1.1 Hydrostratigraphic Information

United Water Conservation District (UWCD) maintains the three-dimensional (3D) hydrostratigraphic model of the Subbasin. This 3D hydrostratigraphic model maps the lateral extents, thicknesses, and properties of the six regional water-bearing aquifers in the Subbasin. The 3D model was designed during development of the VRGWFM and integrates geophysical logs (e-logs) and lithologic data from approximately 575 wells with structural geologic information into a 3D model developed using the Rockworks software (UWCD 2018). Since adoption of the GSP, UWCD has continued development of the 3D hydrostratigraphic model of the region. UWCD has focused their hydrostratigraphic model updates to the areas underlying the Naval Base Ventura County (NBVC) installations at Point Mugu and Port Hueneme, where groundwater is impacted by seawater intrusion.

NBVC Point Mugu

NBVC staff provided UWCD with e-logs, borehole lithologic data, and cone penetrometer test data at approximately 50 locations on the base. These data provide information on subsurface conditions underlying the base to depths of approximately 150 ft below ground surface (bgs). UWCD integrated these data into their hydrostratigraphic model to update the interpreted thicknesses of the semi-perched aquifer, Oxnard aquifer, Mugu aquifer, and the aquitards that separate these three water-bearing units.

NBVC Port Hueneme

While revising the hydrostratigraphic mapping underlying NBVC Point Mugu, UWCD re-evaluated the hydrostratigraphy of the Subbasin underlying NBVC Port Hueneme. To do this, UWCD developed new cross sections using e-log data, onshore seismic-reflection profiles, and sea-floor seismic-reflection profiles that were not analyzed during development of the VRGWFM (Johnson et al. 2012; UWCD 2021d). These data were used to update aquifer thicknesses and lateral extents to depths of approximately 850 ft bgs, with a focus on refining the interpreted thickness and extent of the Hueneme aquifer.

4.1.1.2 Depth-Discrete Groundwater Elevation Data

In 2019 and 2020, DWR installed a nested monitoring well cluster for FCGMA under DWR's Technical Support Services program adjacent to Revolon Slough within the Oxnard Pumping Depression Management Area. The new well consists of shallow and deep well clusters that improves characterization of vertical gradients between the principal aquifers and addresses a data gap in the spatial distribution of depth-discrete groundwater elevation measurements identified in the GSP.

The shallow well cluster, which was completed on November 22, 2019, contains three monitoring wells individually screened within the Oxnard, Mugu, and Hueneme aquifers. The deep well cluster, which was completed on March 19, 2020, contains three monitoring wells individually screened within the upper and basal zones of the FCA and the GCA. These new depth-discrete monitoring wells are measured quarterly using an electronic sounder and are sampled to characterize local groundwater quality conditions. Data collected at these wells have been used to improve groundwater elevation contouring and interpretation of aquifer-specific conditions since March 2020 and have been included in the GSP annual reports covering water years 2020 through 2023.

4.1.1.3 Numerical Modeling Studies

Effects of Management Area Pumping on Seawater Intrusion

To support effective management and meet the sustainability goal for the Subbasin by 2040, the GSP established five management areas: the Forebay Management Area, the West Oxnard Plain Management Area, the Oxnard Pumping Depression Management Area, the Saline Intrusion Management Area, and the East Oxnard Plain Management Area (FCGMA 2019). The relative influence of pumping within each management area on seawater intrusion into the Subbasin was identified as a data gap in the GSP.

To improve understanding of the influence of pumping within each management area on seawater intrusion, FCGMA initiated a numerical modeling study of the Subbasin that used the VRGWFM to evaluate the impacts of re-distributed pumping on historical seawater intrusion to the Subbasin. The study evaluated five (5) different pumping redistribution scenarios that simulated a 10% shift in historical pumping between management areas. The estimate of coastal flux into the Saline Intrusion Management Area, which represents the approximate lateral extent of seawater intrusion in the Subbasin, was used to quantify the relative impacts of pumping within each management area on seawater intrusion (Section 4.1.2.3).

4.1.2 Improvements to the Hydrogeologic Conceptual Model

4.1.2.1 Hydrostratigraphic Information

Semi-Perched Aquifer

Geophysical and lithologic data collected across the Subbasin suggests that the semi-perched aquifer extends from land surface to depths of approximately 140 ft. bgs (UWCD 2021d), except for in the Forebay Management Area where the semi-perched aquifer is not present. Near NBVC Point Mugu, the semi-perched aquifer gradually increases in thickness from northwest to southeast. On the northwestern portion of the base, the semi-perched aquifer is interpreted to range in thickness from 20 to 30 feet. Near Mugu Lagoon and Calleguas Creek, the semi-perched aquifer ranges in thickness from approximately 80 to 100 feet.

These new data result in similar interpretations of the semi-perched aquifer thickness in the northwestern portion of the base (UWCD 2018, UWCD 2021d). Near Mugu Lagoon, these data suggest that that the semi-perched aquifer is approximately 20 to 50 feet thinner than previously interpreted (UWCD 2018, UWCD 2021d).

Clay Cap

The semi-perched aquifer is separated from the underlying Oxnard aquifer of the UAS by a laterally continuous clay cap[12]. Geophysical and lithologic data collected across the Subbasin suggests that the clay cap ranges in thickness from approximately 10 to 100 feet, except in the Forebay Management Area, where the clay cap is not present.

Data collected from NBVC Point Mugu suggests that the thickness of the clay cap varies across the base. On the northwestern portion of the base, the clay cap is interpreted to range from 50 to 80 feet thick (UWCD 2021d). Near Mugu Lagoon and Calleguas Creek, the clay cap ranges in thickness from approximately 10 to 30 feet. These new data suggest that the clay cap is up to approximately 30 feet thinner than previously interpreted in the northeastern portion of the base and is approximately 15 to 30 feet thicker than previously interpreted in the southwestern portion of the base (UWCD 2018, UWCD 2021d).

Upper Aquifer System

As previously described, the UAS comprises the Oxnard and Mugu aquifers. Within the NBVC Point Mugu boundaries, the Oxnard aquifer lithology is variable and consists of fine- to coarse-grained sand, with interbeds of clay, silt, and gravel. The Mugu aquifer is composed of sands and gravels, with silt and clay interbeds, but it is generally finer grained than the Oxnard aquifer. The Oxnard and Mugu aquifers are separated by a 10 to 40-foot-thick aquitard within the NBVC Point Mugu area.

In the NBVC Point Mugu area, the UAS ranges in thickness from approximately 200 to 300 feet (UWCD 2021d). The UAS is thickest in the northern part of the base, and generally thins towards Mugu Lagoon. This interpretation is consistent with previous interpretations of the northern part of the base and southeastern parts of the base. In the central part of the base, underlying Point Mugu Game Reserve, the NBVC data indicate that the UAS is up to 50-feet thinner than previously interpreted.

12 The semi-perched and underlying confining clay are not present within the Forebay Management Area of the Subbasin.

Hueneme Aquifer

The Hueneme aquifer is present across the majority of the Subbasin, except underlying NBVC Point Mugu, where uplift has eroded the Hueneme aquifer, and the Mugu aquifer sits unconformably on the FCA (FCGMA 2019). The geophysical data and seismic refraction data analyzed as part of the hydrogeologic conceptual model update indicates that in the NBVC Port Hueneme area, the Hueneme aquifer rapidly thins from approximately 500 feet on the northwestern part of the base, to less than 10 feet south of Hueneme Road (UWCD 2021d). While this interpretation is generally consistent with previous interpretations of the extent of the Hueneme aquifer, the data indicate that the Hueneme aquifer may be up to 50 feet thinner than previously interpreted (UWCD 2021d).

4.1.2.2 Depth-Discrete Groundwater Elevation Data

Groundwater elevations measured at the new depth-discrete monitoring located near Revolon Slough were used to characterize seasonal high and low groundwater elevations starting in water year 2021 (Section 7.2). Improvements to the understanding of groundwater conditions in the UAS and LAS based on these measurements are discussed in detail in the 2022, 2023, and 2024 GSP annual reports for the Subbasin and are summarized below.

Upper Aquifer System

The nested well cluster located near Revolon Slough contains two completions within the UAS:

- Well 01N21W16P07S is screened 140 to 180 ft. bgs in the Oxnard aquifer.
- Well, 01N21W16P06S is screened 340 to 460 ft. bgs in the Mugu aquifer.

Groundwater elevations measured at these wells have improved characterization of groundwater conditions within the UAS within the Oxnard Pumping Depression Management Area.

Oxnard Aquifer

Seasonal low groundwater elevations between water year 2021 and 2023 at well 01N21W16P07S ranged from a low of approximately -5 ft. mean sea level (msl) (measured in fall 2021) to a high of approximately -0.5 ft. msl (measured in fall 2020). Throughout the 2021 to 2023 water year period, groundwater elevations measured at well 01N21W16P07S were higher than groundwater elevations measured farther west within the Oxnard Pumping Depression Management Area and along the coastline (FCGMA 2022, FCGMA 2023, FCGMA 2024).

Mugu Aquifer

Seasonal low groundwater elevations between water year 2021 and 2023 at well 01N21W16P06S ranged from a low of approximately -86 ft. msl (measured in fall 2022) to a high of approximately -61 ft. msl (measured in fall 2020). Throughout the 2021 to 2023 water year period, groundwater elevations measured at well 01N21W16P06S were consistent with previous groundwater elevation interpretations, which suggest that groundwater elevations in the Mugu aquifer are lowest near the intersection of Hueneme Road and Highway 1 (FCGMA 2022, FCGMA 2023, FCGMA 2024).

Vertical Gradients within the UAS

Groundwater elevations measured at wells 01N21W16P07S and 01N21W16P06S indicate that within the Oxnard Pumping Depression Management Area, there is a downward vertical gradient between the Oxnard and Mugu aquifers. Over the 2021 to 2023 water years, the downward vertical gradient ranged from approximately 0.2 to 0.3 feet per foot.

Lower Aquifer System

The nested well cluster located near Revolon Slough contains four completions within the LAS:

- Well 01N21W16P05S is screened 510 to 640 ft bgs in the Hueneme aquifer.
- Well 01N21W16P10S is screened 710 to 860 ft bgs in the upper FCA.
- Well 01N21W16P09S is screened 960 to 1050 ft bgs in the basal FCA.
- Well 01N21W16P08S is screened 1,130 to 1,180 ft. bgs in the GCA.

Groundwater elevations measured at these wells help improve characterization of groundwater conditions within the LAS of the Oxnard Pumping Depression Management Area.

Hueneme Aquifer

Seasonal low groundwater elevations between water year 2021 and 2023 at well 01N21W16P05S ranged from a low of approximately -129 ft. msl (measured in fall 2022) to a high of approximately -88 ft. msl (measured in fall 2020). Throughout the 2021 to 2023 water year period, groundwater elevations measured at well 01N21W16P05S corresponded to the regional low groundwater elevations within the Hueneme aquifer (FCGMA 2022, FCGMA 2023, FCGMA 2024).

Fox Canyon Aquifer

Between water year 2021 and 2023 fall groundwater elevations in the upper FCA ranged from a low of approximately -125 ft. msl (measured in fall 2022) to a high of approximately -88 ft. msl (measured in fall 2020). Over this same period in the basal FCA, fall groundwater elevations ranged from a low of -129 ft. msl (measured in fall 2022) to a high of approximately -89 ft. msl (measured in fall 2020). Throughout the 2021 to 2023 water year period, groundwater elevations measured at well 01N21W16P10S were approximately 20 to 45 feet higher than the regional low groundwater elevations in the FCA, which occurred along the boundary with the PVB (FCGMA 2022, FCGMA 2023a, FCGMA 2024). Over this period, groundwater elevations in the basal FCA were approximately 0.5 to 5 feet lower than the upper FCA.

Grimes Canyon Aquifer

Seasonal low groundwater elevations between water year 2021 and 2023 at well 01N21W16P08S ranged from a low of approximately -125 ft. msl (measured in fall 2022) to a high of approximately -88 ft. msl (measured in fall 2020). Throughout the 2021 to 2023 water year period, groundwater elevations measured at well 01N21W16P08S were the lowest regional low groundwater elevations within the GCA (FCGMA 2022, FCGMA 2023, FCGMA 2024). Over this period, groundwater elevations in the GCA were approximately 0.5 to 4 feet higher than the basal FCA groundwater elevations measured at this location.

Vertical Gradients within the LAS

Groundwater elevations measured at wells 01N21W16P05S and 01N21W16P09S indicate that within the Oxnard Pumping Depression Management Area, there is a limited vertical gradient between the Hueneme aquifer, FCA, and GCA. Over the 2021 to 2023 water years, the vertical gradient measured at these two wells ranged from approximately 0.001 to 0.01 feet per foot between the Hueneme aquifer and the FCA. The vertical gradient between the FCA and GCA also ranged from approximately 0.001 to 0.01 feet per foot over this same period.

Vertical Gradients between the UAS and LAS

Groundwater elevations measured at wells 01N21W16P10S through -05S indicate that within the Oxnard Pumping Depression Management Area, there is a downward vertical gradient between the UAS and LAS. Over the 2021 to 2023 water years, the downward vertical gradient ranged from approximately 0.15 to 0.25 feet/foot. The downward gradient between the UAS and LAS is one to two orders-of-magnitude higher than the vertical gradients between the Hueneme aquifer, FCA, and GCA.

4.1.2.3 Numerical Modeling Studies

Effects of Management Area Pumping on Seawater Intrusion

The numerical modeling evaluation performed by FCGMA in 2022 indicated that shifting production out of the more impacted management areas may increase the sustainable yield of the Subbasin. The numerical modeling evaluation provided three key take-aways:

- Shifting pumping out of the Saline Intrusion Management Area reduces seawater intrusion by approximately 20% of the transferred pumping volume.
- Shifting pumping from the Forebay or West Oxnard Plain management areas into the Oxnard Pumping Depression Management Area increases seawater intrusion by approximately 10% of the transferred pumping volume.
- Shifting pumping from the Forebay Management Area to the West Oxnard Plain Management Area increases the coastal flux north of Channel Island Harbor by approximately 6% of the shifted pumping but has little impact on seawater flux into the Saline Intrusion Management Area. Seawater intrusion has not been observed on the coast north of Channel Islands Harbor.

These results were used to inform the future scenario modeling performed as part of this periodic GSP evaluation (Section 5.2, Future Scenario Water Budgets and Sustainable Yield).

4.1.2.4 Potential Recharge Areas

To evaluate potential future recharge areas within, and surrounding, the Subbasin, soil types were obtained from the Web Soil Survey, available online at https://websoilsurvey.nrcs.usda.gov/ (USDA 2019). Soil Ksat rates (saturated hydraulic conductivity rates) for soils of 92 micrometers per second or greater were plotted (Figure 4-1, Potential Recharge Areas). In addition to this, areas where the FCA outcrops at land surface act as potential recharge areas for the Subbasin.

4.1.3 Data Gaps

The GSP identified data gaps in the hydrogeologic conceptual model of the Subbasin that create uncertainty in the understanding of the impacts of groundwater production on water-level changes and seawater intrusion (FCGMA 2019). These data gaps are summarized in Table 4-1, Summary of Actions Taken to Address Data Gaps Identified in the GSP. Since adoption of the GSP, FCGMA and other agencies in the Subbasin have begun to address these data gaps. A summary of the actions taken by FCGMA and other agencies in the Subbasin is included in Table 4-1.

While FCGMA and other agencies in the Subbasin have begun to address data gaps, some remain. To help prioritize projects that address these remaining data gaps, FCGMA has developed a project evaluation process that formalized a set of criteria used to weigh project benefits and costs and quantitatively rank projects in the Subbasin. The ranking system is intended to prioritize projects for future funding. FCGMA anticipates the using this process to identify, rank, fund, and implement projects in the Subbasin, annually. Projects that address data gaps will be included in this process.

Table 4-1. Summary of Actions Taken to Address Data Gaps Identified in the GSP

Data Gap Identified in the GSP		Actions Taken
No.	Description	
1	Distributed measurements of aquifer properties	▪ FCGMA has collected geophysical and lithologic data from the new monitoring wells constructed in the Oxnard Subbasin. These data help to improve understanding of local aquifer thickness and characteristics.
2	Distributed measurements of groundwater quality	▪ VCWPD and UWCD continue to sample a network of groundwater wells that characterize aquifer-specific groundwater quality conditions in the Subbasin. UWCD and VCWPD added 13 new wells to the groundwater quality monitoring network, 11 are screened within a single aquifer in the Subbasin.
3	Measurements of groundwater quality that distinguish the sources of high TDS in the FCA and GCA	▪ FCGMA and other agencies in the Subbasin have not initiated new technical studies that distinguish the sources of high TDS in the FCA and GCA.
4	Temporal limitations on groundwater elevation data	▪ UWCD added four wells to their existing groundwater elevation monitoring network that are equipped with pressure transducers. These wells are in the Forebay Management Area, WOPMA, and Oxnard PDMA. ▪ In 2022, FCGMA was awarded grant funds under DWR's SGM funding opportunity. As part of this, FCGMA will be constructing up to two new nested well clusters in the Subbasin. FCGMA anticipates equipping these wells with pressure transducers. FCGMA anticipates completing construction in the 2024 calendar year.
6	Relative impacts of groundwater production from specific areas within the Subbasin on seawater intrusion	▪ In 2022, FCGMA conducted a numerical modeling study to evaluate the impacts of pumping within each management area on seawater intrusion into the Subbasin. These results were used to constrain future scenario modeling for this periodic GSP evaluation. A summary of this study is included in Section 4.1.
7	Connection between the semi-perched aquifer and potential GDEs	▪ In 2022, FCGMA was awarded grant funds under DWR's SGM funding opportunity. As part of this, FCGMA will be constructing three new shallow monitoring wells located near Calleguas Creek, Revolon Slough and Santa Clara River. These monitoring wells will be completed within the semi-perched aquifer; data collected from these wells will help address this data gap. FCGMA anticipates completing construction in the 2024 calendar year.
8	Potential impacts of increased production in the semi-perched aquifer	▪ FCGMA and other agencies in the Subbasin have not undertaken new technical studies to evaluate the potential impacts of increased production in the semi-perched. However, as noted in the GSP, the semi-perched aquifer is not a principal aquifer and, currently, there are no plans to expand production in the semi-perched in the future.

Notes: UWCD = United Water Conservation District; VCWPD = Ventura County Watershed Protection District; SGM = Sustainable Groundwater Management; WOPMA = West Oxnard Plain Management Area; PDMA = Pumping Depression Management Area

4.1.3.1 Newly Identified Data Gaps

Emerging Contaminants

On April 10, 2024, the U. S. Environmental Protection Agency announced final drinking water regulations for six per- and polyfluoroalkyl substances (PFAS) (U.S. EPA 2024; Table 4-2, Final MCLGs and MCLs for PFAS). Under the final ruling:

- Public water systems must monitor for regulated PFAS. Initial monitoring must be completed by 2027, followed by ongoing compliance monitoring. Starting in 2027, public water systems must also provide the public with information on the level of PFAS in their drinking water.
- Public water systems must, by 2029, implement solutions to reduce PFAS if concentrations exceed the final maximum contaminant levels.
- Beginning in 2029, public water systems that have PFAS in drinking water which violates the maximum contaminant levels must take action to reduce these PFAS levels and provide public notification of the violation.

At the time of GSP adoption, PFAS was not regulated under State or Federal guidelines.

Table 4-2. Final MCLGs and MCLs for PFAS

Compound	Final MCLG	Final MCL
PFOA	Zero	4.0 ppt
PFOS	Zero	4.0 ppt
PFHxS	10 ppt	10 ppt
PFNA	10 ppt	10 ppt
HFPO-DA (commonly known as GenX Chemicals)	10 ppt	10 ppt
Mixtures containing two or more PFHxS, PFNA, HFPO-DA, and PFBS	1 (unitless) Hazard Index	1 (unitless) Hazard Index

Notes: MCLG = Maximum Contaminant Level Goal; MCL = Maximum Contaminant Level; ppt = parts per trillion, also expressed as nano-grams per liter (ng/L)

Public water suppliers in the Subbasin are currently performing baseline monitoring to evaluate concentrations, if prevalent, of PFAS in their water supplies (Figure 4-2, Public Water System Wells Currently Monitoring PFAS Concentrations in Groundwater). As noted above, public water suppliers are not required to complete baseline monitoring until 2027.

4.2 Water Uses during the Evaluation Period

The GSP characterized historical land uses and water supplies in the Subbasin through December 31, 2015. Since 2015, FCGMA and other agencies in the Subbasin have implemented projects that have diversified water supplies in the Subbasin and supported ongoing conjunctive use of surface water, recycled water, and groundwater. This section summarizes the water supplies in the Subbasin since 2015. Land use changes in the Subbasin since 2015 are provided for context.

4.2.1 Land Use Changes in the Oxnard Subbasin

Land use change in the Subbasin was evaluated using DWR's statewide land use data for 2014[13] and 2022. Land uses were grouped into three categories: agriculture, urban, and idle/unclassified (Table 4-3, Land Use Change 2014-2022). The largest changes in land use over the 2014 to 2022 period occurred within the urban sector. Agricultural land uses in 2022 were similar to those in 2014. The total land area of the Subbasin in DWR's published land use varies by 1,418 acres between 2014 and 2022 pointing to uncertainty in the data which should be considered when evaluating the land-use changes.

Table 4-3. Land Use Change 2014–2022

Land Use	2014 (Acres)	2022 (Acres)	Difference (Acres)	Percent Change
Agriculture	22,873	22,516	-357	-2%
Urban	18,603	19,952	1,349	7%
Idle/Unclassified	101	527	426	422%

Source: DWR 2024.
Notes: In 2014, mapped land use totaled 41,577 acres. In 2022, mapped land use totaled 42,995 acres. The difference in total mapped acreage reflects uncertainty in the land use mapping and does not represent a change in the areal extent of the Subbasin.

4.2.2 Water Supplies during the Evaluation Period

Water supplies in the Subbasin consist of surface water, imported water, recycled water, and groundwater. This section of the GSP evaluation summarizes the total water supplies in the Subbasin and provides a comparison to historical availability. Because the GSP provides data on water supplies through 2015, water supply data are summarized here for water years 2016 through 2023. However, water-use trends over the evaluation period are characterized using data for the period of water year 2020 through 2023[14]. Data for water year 2024 were not available at the time of reporting.

4.2.2.1 Groundwater

On October 23, 2019, the FCGMA Board of Directors adopted an Ordinance to Establish an Allocation System for the Oxnard and Pleasant Valley Groundwater Basins, effective October 1, 2020. The prior system provided an efficiency allocation to agricultural pumpers based on the crop type, number of acres planted, and water-year type. This enabled increased groundwater extractions if more water-intensive crops were planted, or additional acres were brought into production. The new system established fixed extraction allocations assigned to each production well, a change that was needed to sustainably manage the Subbasin. The ordinance additionally transitioned extraction reporting from calendar year to water year.

13 Because land use data was not published for 2015, the 2014 data are used here.
14 Groundwater extraction trends for the evaluation period are summarized using data from two years: water year 2021 and 2022. Water year 2020 was not included because this was a transitional reporting year. Water year 2023 was not included because, at the time of reporting, FCGMA had only received and/or processed extraction reports for approximately 80% of the operators in the Subbasin.

Table 4-4. Groundwater Extractions in the Oxnard Subbasin by Aquifer System and Water Use Sector

Year	Extraction Reporting Complete/ Estimated Percentage Complete (%)[a]	Upper Aquifer System (Acre-Feet)				Lower Aquifer System (Acre-Feet)				Wells in multiple or unassigned aquifer systems (Acre-Feet)				Total (Acre-Feet)
		AG	Dom	M&I	Sub-Total	AG	Dom	M&I	Sub-Total	AG	Dom	M&I	Sub- Total	
CY 2016[b]	Yes	15,710	65	12,681	*28,455*	31,366	24	10,623	*42,013*	8,315	110	584	*9,009*	79,477
CY 2017	Yes	15,841	59	14,785	*30,685*	29,248	27	8,613	*37,888*	9,922	45	418	*10,385*	78,959
CY 2018	Yes	15,097	58	16,936	*32,091*	26,596	24	6,601	*33,222*	9,735	20	309	*10,064*	75,376
CY 2019	Yes	13,112	58	17,820	*30,990*	22,473	27	6,413	*28,913*	9,394	36	544	*9,974*	69,877
2020[c]	Yes	9,333	48	14,782	*24,163*	14,389	9	5,079	*19,478*	7,183	46	529	*7,758*	51,399
WY 2021	Yes	13,782	66	20,981	*34,829*	23,407	6	7,782	*31,196*	8,980	29	754	*9,763*	75,788
WY 2022	Yes	12,398	52	18,966	*31,416*	23,250	14	7,148	*30,412*	9,452	27	2,898	*12,377*	74,205
WY 2023[d]	No/80%	7,445	31	12,710	*20,186*	14,925	11	11,583	*26,519*	4,580	13	471	*5,064*	51,769
2016-2022 Average[e]		14,323	60	17,028	31,411	26,057	20	7,863	33,940	9,300	44	918	10,262	75,613
2021 - 2022 Average[e,f]		13,090	59	19,974	33,123	23,329	10	7,465	30,804	9,216	28	1,826	11,070	74,996

Notes: CY = Calendar Year; WY = Water Year; AG = Agriculture; Dom = domestic; M&I = Municipal and Industrial. Groundwater extraction data updated based on additional review of Automated Metering Infrastructure data.

[a] Qualifier indicates whether extraction reporting is complete for the given year. “Yes” indicates no additional reporting is anticipated. “No” indicates that additional reporting is anticipated. The percentage included after the “No” qualifier represents the estimated total percentage of operators who have reported extractions as of January 26, 2024.

[b] Total pumping in 2016 includes 4 acre-feet of groundwater production from the semi-perched aquifer that were used by the M&I sector.

[c] Groundwater extraction reporting is from January 1, 2020, through September 30, 2020, due to transition to water year reporting.

[d] Groundwater extractions are preliminary and will be updated during preparation of the 2025 GSP Annual report based on receipt of additional reporting.

[e] Excludes 2020 because this was a transitional reporting year in which only nine (9) months of extractions were reported to FCGMA.

[f] Excludes 2023 from the average because approximately 20% of the extraction reports are outstanding.

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Historically, groundwater extractions in the Subbasin have been reported semiannually. Because groundwater extractions were not reported monthly, groundwater production prior to 2020 cannot be reported on a water year basis. Therefore, extractions from 2016 through 2019 reported in Table 4-4, Groundwater Extractions in the Oxnard Subbasin by Aquifer System and Water Use Sector, follow the historical precedent and represent calendar year extractions. Due to the transition from calendar year to water year reporting in 2020, groundwater extractions reported for 2020 represent extractions for the nine-month period from January 1, 2020, through September 30, 2020 (Table 4-4).

The water year 2023 extractions presented in Table 4-4 represent the extractions reported to FCGMA as of January 26, 2024, and do not include estimates of extractions for wells that had not yet been reported. As of January 26, 2024, FCGMA had received reporting from approximately 80% of the operators in the Subbasin. In water year 2022, extractions from operators with missing 2023 reports accounted for approximately 10% of the total extractions from the Subbasin.

Comparison to Historical Groundwater Supplies

During the 1985 to 2015 period, an average of approximately 80,500 AFY of groundwater was extracted from the Subbasin (FCGMA 2019). Approximately 65% was used for agriculture, 35% was used for municipal supply, and less than 1% was used for domestic purposes. Available data characterizing groundwater extractions in water years 2021 and 2022 indicate that groundwater extractions from the Subbasin averaged approximately 75,000 AFY (Table 4-4), or 7% lower than the 1985 to 2015 average. In water years 2021 and 2022, approximately 61% of the pumped groundwater was used for agriculture, 39% was used for municipal supply, and less than 1% was used for domestic purposes.

Additionally, data from 2016 through 2022, a period over which Santa Clara River diversions were diminished as a result of long-term drought conditions, indicate that groundwater extractions from the UAS increased in the Subbasin while extractions from the LAS decreased (Table 4-4).

Comparison to Projected Groundwater Supplies

Future projections of groundwater extractions were updated as part of this periodic GSP evaluation (Section 5.2). Under baseline conditions, groundwater extractions from the Subbasin are projected to average approximately 68,300 AFY. This is approximately 6,700 AFY lower than the average annual groundwater extraction from the Subbasin in water years 2021 and 2022. The difference between groundwater extractions over the 2021 and 2022 water years and the projected groundwater extraction rates is associated with long-term availability of surface and recycled water for use in lieu of groundwater (Section 5.2.1).

4.2.2.2 Surface Water

The primary source of surface water supply in the Subbasin is the Santa Clara River. UWCD operates the Freeman Diversion, which allows UWCD to divert surface water from the Santa Clara River for recharge in the Forebay and delivery to agricultural operators in the Subbasin and adjacent PVB via their Pumping Trough Pipeline (PTP) and Pleasant Valley Pipeline (PVP). Surface water diverted by UWCD includes imported SWP water. In 2019, FCGMA and UWCD entered into an agreement that funded UWCD's purchase of 15,000 AF of surplus SWP water for delivery and recharge in the Subbasin.

In addition to the Santa Clara River, a portion of the Conejo Creek surface water diverted by Camrosa Water District (CWD) is supplied to PVCWD for agricultural irrigation within the Subbasin. Santa Clara River water and Conejo Creek water used in the Subbasin over the evaluation period is summarized in Table 4-5, Surface Water Supplies in the Subbasin.

Table 4-5. Surface Water Supplies in the Subbasin

Water Year	PVCWD	UWCD			Total (acre-feet)
	Conejo Creek Flows Delivered by CWD to PVCWD[a] (acre-feet)	Diversions of Santa Clara River Water			
		PTP deliveries (acre-feet)	PVP deliveries[b] (acre-feet)	Recharge to UWCD Spreading Basins (acre-feet)	
2016	1,038	0	0	2,209	**3,247**
2017	1,774	0	0	10,297	**12,071**
2018	1,854	0	0	3,126	**4,980**
2019	2,795	1,059	309	36,768	**40,931**
2020	2,310	2,494	966	28,327	**34,097**
2021	2,035	3,823	1,049	12,820	**19,727**
2022	2,392	1,905	425	11,448	**16,170**
2023	2,225	3,558	2,285	111,254	**119,322**
2016 – 2023 Average	**2,053**	**1,605**	**629**	**27,031**	**31,318**
2020 – 2023 Average	**2,241**	**2,945**	**1,181**	**40,962**	**47,329**

Notes:
Acronyms: PVCWD = Pleasant Valley County Water District; UWCD = United Water Conservation District; CWD = Camrosa Water District; PTP = Pumping Trough Pipeline; PVP = Pleasant Valley Pipeline.

[a] Estimated by using 56% of the total Conejo Creek water delivered by CWD to PVCWD. This division is based on the fraction of PVCWD's service area that overlies the Subbasin.

[b] Estimated by using 56% of the total Santa Clara River Water deliveries to the PVP. This division is based on the fraction of PVCWD's service area that overlies the Subbasin.

During the 2020 to 2023 period, PVCWD delivered an average of approximately 2,200 AFY of Conejo Creek water to agricultural users within the Subbasin. UWCD delivered an average of approximately 4,100 AFY of Santa Clara River water to users on the PTP and to PVCWD via the PVP. In water years 2020, 2021, and 2022, UWCD recharged an average of approximately 18,000 AFY of Santa Clara River water to the Subbasin. In water year 2023, a wet water year, UWCD recharged approximately 111,000 AF of Santa Clara River water.

Comparison to Historical Surface Water Supplies

CWD began delivering Conejo Creek Project water to PVCWD in 2002 (FCGMA 2019). Between 2002 and 2015, CWD delivered an average of approximately 2,600 AFY of Conejo Creek Project water to PVCWD for agricultural uses (FCGMA 2019). CWD's average annual delivery of Conejo Creek water to PVCWD during the 2020 to 2023 period is approximately 15% lower than the historical delivery volumes (Table 4-5).

UWCD constructed the PVP[15] in 1959 to deliver surface water diverted from the Santa Clara River to PVCWD, which delivers this water to agricultural customers in both the Subbasin and the PVP. The PTP was jointly constructed in 1986 by UWCD, the County of Ventura, and FCGMA, to deliver surface water from the Santa Clara River to agricultural customers in the pumping depression to reduce pumping in the UAS. UWCD delivers surface water diverted from the Santa Clara River and groundwater pumped from the LAS to agricultural operators in the Subbasin. Between 1985 and 2015, UWCD delivered an average of approximately 9,800 AFY of Santa Clara River water to users on the PVP and PTP (FCGMA 2019). Between water years 2020 and 2023, UWCD's deliveries on the PVP and PTP were approximately 60% lower than the 1985 to 2015 average (Table 4-5). The reduction in PVP and PTP deliveries over this time reflects the drought conditions experienced in the Subbasin during the first three years of the evaluation period.

UWCD began recharging Santa Clara River water in the Forebay in the mid-1950s. Over the 1985 to 2015 period, UWCD recharged an average of approximately 48,300 AFY of Santa Clara River water in the Forebay (FCGMA 2019). During the first three-years of the evaluation period, UWCD recharged an average of approximately 17,500 AFY, which is approximately 65% lower than the 1985 to 2015 average. In the wet 2023 water year, UWCD recharged approximately 111,000 AF of Santa Clara River water in the Forebay - this was the third largest volume of Santa Clara River water recharged in a single year by UWCD since 1985.

Comparison to Projected Surface Water Supplies

Future projections of surface water availability in the Subbasin were updated as part of this periodic GSP evaluation (Section 5.2). Under baseline conditions, UWCD anticipates being able to divert an average of approximately 62,000 AFY from the Santa Clara River. UWCD's average annual Santa Clara River water diversions during the evaluation period were approximately 25% lower than projected, which reflects the drier-than-average hydrology experienced between water years 2019 through 2022. Additionally, UWCD is constructing projects to provide additional flexibility in diverting Santa Clara River water. CWD anticipates delivering approximately 4,400 AFY of Conejo Creek Project water to PVCWD, approximately 2,460 AFY[16] of which would be served in the Subbasin. CWD's delivery of Conejo Creek Project water to PVCWD during the evaluation period is approximately 400 AFY lower than their future projections.

4.2.2.3 Imported Water

Calleguas Municipal Water District (CMWD) provides imported potable water to the City of Oxnard and Port Hueneme Water Agency for municipal use. Sales and use of imported water supplied by CMWD is summarized in Table 4-6, Sales and Use of Imported Water Supplied by CMWD. Additionally, SWP water imported by UWCD is delivered through Lake Piru and diverted at the Freeman diversion. UWCD's importations are included in the sum of PTP, PVP, and recharge volumes shown in Table 4-6.

Table 4-6. Sales and Use of Imported Water Supplied by CMWD

Water Year	Delivered and Used by the City of Oxnard for M&I (acre-feet)	Delivered and Used by the PHWA for M&I (acre-feet)	Total Imported Water (acre-feet)
2016	10,854	459	**11,313**

15 Deliveries via the PVP consist exclusively of Santa Clara River water.
16 Calculated by multiplying CWD's projections for Conejo Creek deliveries to PVCWD by the percentage of PVCWD's service area that overlies the Subbasin.

Table 4-6. Sales and Use of Imported Water Supplied by CMWD

Water Year	Delivered and Used by the City of Oxnard for M&I (acre-feet)	Delivered and Used by the PHWA for M&I (acre-feet)	Total Imported Water (acre-feet)
2017	10,179	561	10,740
2018	11,382	789	12,171
2019	9,418	580	9,998
2020	8,729	983	9,712
2021	9,435	654	10,089
2022	7,770	735	8,505
2023	6,207	408	6,615
2016 – 2023 Average	9,247	646	9,247
2020 – 2023 Average	8,035	695	8,730

Notes: Acronyms: M&I = Municipal and Industrial; PHWA = Port Hueneme Water Agency

Over the 2020 to 2023 period, CMWD delivered an average of approximately 8,700 AFY of imported water for municipal and industrial uses within the Subbasin. Approximately 92% of this was for municipal use by the City of Oxnard (Table 4-6).

Comparison to Historical Imported Water Supplies

CMWD delivered an average of approximately 14,500 AFY of imported water between 1985 and 2015. Over the last decade, imported water supplied by CMWD in the Subbasin has declined from a maximum of approximately 18,000 AF in 2013 to a minimum of approximately 6,600 AF in 2023 (FCGMA 2019; Table 4-6). The average annual volume of imported water supplied by CMWD in the Subbasin during the evaluation period is approximately 40% lower than the 1985 to 2015 average.

Comparison to Projected Imported Water Supplies

In their 2015 and 2020 Urban Water Management Plans, CMWD included projections for the City of Oxnard's and Port Hueneme Water Agency's combined imported water demands. Over the 2020 to 2025 period, these projections average approximately 16,400 AFY (CMWD 2016; CMWD 2021). Under normal, single year dry, and multi-year dry scenarios, CMWD does not anticipate experiencing water supply shortages that would impact their ability to meet these demands (CMWD 2016; CMWD 2021).

Over the 2020 to 2023 period, the City of Oxnard's and Port Hueneme Water Agency's combined imported-water demand was approximately 50% lower than the projections included in CMWD's 2015 and 2020 Urban Water Management Plans.

4.2.2.4 Recycled Water

Recycled water provides a source of agricultural water supply within the Subbasin. Recycled water used in the Subbasin originates from three sources: the City of Oxnard's AWPF, the Camarillo Sanitary District Water Reclamation Plant, and CWD's Water Reclamation Facility (CWRF; Table 4-7 Recycled Water Supplied and Used within the Subbasin).

In 2016, the City of Oxnard began delivering AWPF water to both PVCWD and agricultural operators within the Subbasin. The City of Oxnard delivers recycled water to PVCWD and agricultural operators for use in lieu of groundwater and accrues one acre-foot of Recycled Water Pumping Allocation for each acre-foot of recycled water delivered that results in an acre-feet reduction in groundwater extraction (FCGMA 2023b). In 2019, CWD began delivering recycled water produced at the Camarillo Sanitary District Water Reclamation Plant and CWRF to PVCWD for agricultural use.

Table 4-7. Recycled Water Supplied and Used within the Subbasin

Water Year	Recycled Water Served in PVCWD (acre-feet) [a]			AWPF served directly to AG operators in the Subbasin (acre-feet)	Total (acre-feet)
	CamSan	CWRF	AWPF		
2016	0	0	234	43	276
2017	0	0	776	110	886
2018	0	0	1,146	370	1,516
2019	0	0	849	145	993
2020	619	376	0	63	1,058
2021	826	292	0	109	1,227
2022	663	191	7	404	1,266
2023	702	485	113	419	1,719
2016 – 2023 Average	351	168	391	208	1,118
2020 – 2023 Average	702	336	30	249	1,317

Notes:
Acronyms: PVCWD = Pleasant Valley County Water District; AWPF = Advanced Water Purification Facility; CamSan WRP = Camarillo Sanitary District's Water Reclamation Plant; CWRF = Camrosa Water Reclamation Facility.
[a] Estimated by using 56% of the total volume of recycled water delivered to PVCWD. This division is based on the fraction of PVCWD's service area that overlies the Subbasin.

Comparison to Historical Recycled Water Supplies

The recycled water produced at the AWPF, Camarillo Sanitary District's Water Reclamation Plant, and CWRF is a new source of water supply in the Subbasin. Over the 2020 to 2023 period, agricultural operators within the Subbasin used an average of approximately 1,300 AFY of recycled water for irrigation (Table 4-7). Approximately 80% of this was used within the PVCWD service area which spans both the Subbasin and PVB.

Comparison to Projected Recycled Water Supplies

Future projections of recycled water availability in the Subbasin were updated as part of this periodic GSP evaluation (Section 5.2). Under baseline conditions, the City of Oxnard anticipates delivering an average of approximately 1,500 AFY of recycled water to PVCWD and agricultural operators in the Subbasin. The City of Camarillo anticipates delivering an average of approximately 1,400 AFY of Camarillo Sanitary District Water Reclamation Plant water to PVCWD, and CWD anticipates delivering an average of approximately 800 AFY of CWRF water to PVCWD. In total, recycled water supplies in the Subbasin are projected to average approximately 2,200 AFY. Over the evaluation period, recycled water supplies were approximately 900 AFY lower than projected.

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5 Updated Numerical Modeling

Numerical groundwater flow modeling of the Subbasin was performed using the Coastal Plain Model, a version of the VRGWFM MODFLOW numerical model developed and maintained by UWCD, which covers the entirety of the Subbasin, PVB, WLPMA, and Mound Subbasin (UWCD 2018). The Coastal Plain Model is a basin-scale model that reasonably reproduces historical trends in groundwater elevations in response to groundwater production, climate, recharge, and other basin management operations. This model was found to be an appropriate tool for assessing potential future groundwater levels under differing climate and management scenarios in the GSP (FCGMA 2019).

As part of this GSP evaluation of the Subbasin, the VRGWFM was updated to re-evaluate projected future conditions in and validate the model's ability to reproduce groundwater elevations measured between January 1, 2015, and September 30, 2022. Section 5.1, Model Updates, describes the updates to the model since development of the GSP and Section 5.2, describes the updated future scenario modeling performed for this GSP evaluation, along with updated estimates of the sustainable yield of the Subbasin.

5.1 Model Updates

UWCD actively maintains the VRGWFM to support regional groundwater management. The version of the VRGWFM used during development of the GSP covered the entirety of the Oxnard and Mound subbasins and the majority of the WLPMA and PVB (UWCD 2018). Following adoption of the GSP, UWCD expanded the VRGWFM to cover the entirety of WLPMA and PVB and to include the Santa Paula, Piru, and Fillmore subbasins (UWCD 2021e). As part of the VRGWFM expansion and update, UWCD updated the hydrogeologic conceptual model of the Oxnard, Santa Paula, Piru, and Fillmore subbasins to improve representation of local hydrogeologic conditions and, in the Oxnard Subbasin, better represent groundwater elevations along the coast and their influence on seawater intrusion.

Due to the complexity of simulating the effects of Santa Clara River flows on groundwater conditions in the Santa Paula, Piru, and Fillmore subbasins, with a daily timestep, UWCD maintains a version of the VRGWFM that excludes the upper basins and uses a monthly timestep. This branch-off of the VRGWFM is informally referred to as the Coastal Plain Model and covers the entirety of the Subbasin, PVB, WLPMA, and Mound Subbasin. Consistent with the GSP modeling, the Coastal Plain Model represents interactions between the Subbasin and the upgradient Santa Paula Subbasin using a general head boundary condition (FCGMA 2018). While the Coastal Plain Model is distinct from the VRGWFM, the model design and structure are consistent with the model used during development of the GSP. Therefore, the Coastal Plain Model is considered an update to the GSP model and was used for the periodic GSP evaluation modeling.

Improvements to the Coastal Plain Model compared to the GSP model include revised estimates of subsurface exchanges with the Santa Paula Subbasin (Basin No. 4-004.04), and updated hydrostratigraphy in the vicinity of Port Hueneme and Point Mugu (Section 4.1.1.1 Hydrostratigraphic Information). Additionally, as part of this GSP evaluation, UWCD extended the Coastal Plain Model to simulate groundwater conditions in the Subbasin through water year 2022. Updates are summarized below and will be detailed in a technical memorandum prepared by UWCD[17].

17 UWCD anticipates publishing the Coastal Plain Model update technical memorandum in fall 2024.

5.1.1 Underflows from the Santa Paula Subbasin

The Coastal Plain Model includes improved estimates of underflows between the Santa Paula and Oxnard subbasins. These estimates were informed by UWCD's regional modeling efforts with the VRGWFM, which was calibrated to groundwater elevations measured in the Santa Paula, Fillmore, and Piru subbasins, and provides direct simulation of the underflows between each basin. Results from the VRGWFM simulations were used to update the north-eastern general head boundary condition in the Coastal Plain Model, which controls underflows between the Oxnard and Santa Paula subbasins.

5.1.2 Port Hueneme and Point Mugu

As described in Section 4.1.1, in 2020, UWCD updated the hydrogeologic conceptual model of the Subbasin in the vicinity of Port Hueneme and Point Mugu based on newly available geophysical and borehole data. UWCD incorporated the revised hydrostratigraphic mapping into the Coastal Plain Model to better represent hydrogeologic conditions along the coastline. Revisions to the interpreted aquifer thicknesses are summarized in Section 4.1.2. Importantly, these revisions provide an improved representation of hydrogeologic connectivity between the UAS and FCA near Point Mugu.

5.1.3 Model Extension and Recalibration

As part of this periodic evaluation, UWCD extended the Coastal Plain Model to simulate groundwater conditions in the Subbasin through the end of water year 2022 (i.e., September 30, 2022). During the model update and extension process, UWCD recalibrated the Coastal Plain Model. This recalibration effort involved incremental adjustments to local hydraulic conductivity and general head boundary conditions (GHB), which resulted in better simulation of groundwater conditions along the coastline (details to be included in UWCD's Coastal Plain Model update technical memorandum).

5.2 Future Scenario Water Budgets and Sustainable Yield

Future scenario modeling was updated as part of this periodic GSP evaluation to better reflect current groundwater usage trends within the Subbasin; update the future hydrology; and expand the suite of projects included in the simulation of future groundwater conditions. In addition, the future modeling time-period was updated to account for the extension in the historical modeling period. Results from the updated future model scenarios were used to evaluate the estimated sustainable yield of the Subbasin under different project and management scenarios.

Revisions to the simulation time-period, baseline extractions, future hydrology, and suite of projects considered in the future scenarios are described in Section 5.2.1, Updated Future Scenario Assumptions. The suite of future scenarios, and associated model results, are summarized in Section 5.2.2, Projected Water Budgets. Resulting revisions to the estimates of the future sustainable yield of the Subbasin are summarized in Section 5.2.3, Estimates of the Future Sustainable Yield.

In September 2024, as part of the stakeholder review and engagement process, FCGMA, in coordination with UWCD and CWD, identified that the numerical modeling performed for this periodic evaluation double-counted the volume of Camarillo recycled water that would be available to PVCWD. Immediately following this, FCGMA requested revised water supply projections from CWD, the agency responsible for delivering Camarillo recycled water to PVCWD, to:

(i) provide additional clarity on the volumes and sources of recycled water that CWD anticipates delivering to PVCWD, and (ii) confirm that all other CWD water supplies are appropriately represented in the modeling. Through this additional data request, FCGMA determined that the numerical modeling described in this periodic evaluation:

- Over-represents the volume of recycled water supplies available to PVCWD by 1,500 AFY
- Under-represents the volume of Conejo Creek Project deliveries to PVCWD by 400 AFY

As described in Section 5.2.3.1, the difference in simulated and anticipated water supplies to PVCWD does not impact FCGMA's understanding of the future sustainable yield of the Subbasin, Pleasant Valley Basin, and WLPMA. (Section 5.2.3.1, Impacts of Recycled Water Double Count on the Estimate of Sustainable Yield). Because of this, the entire suite of modeling was not updated to correct the representation of future water supplies to PVCWD as part of this periodic evaluation. However, FCGMA anticipates updating the entire suite of numerical modeling performed for this evaluation to accurately represent the revised understanding of PVCWD water supplies.

5.2.1 Updated Future Scenario Assumptions

This section describes the set of assumptions used for the updated modeling and provides a comparison to the assumptions used for the GSP.

5.2.1.1 Updated Simulation Time Period

The future scenarios developed for this periodic evaluation simulate groundwater conditions in the Subbasin over the 47-year period from October 1, 2022, through September 30, 2069 (i.e., water year 2023 through 2069). This simulation period, combined with the 2020, 2021, and 2022 water-year simulation results, provides a 50-year GSP projection horizon as required under SGMA (23 CCR §354.18[18]).

Comparison to the GSP Modeling

The future scenarios developed for the GSP simulated groundwater conditions in the Subbasin over the 50-year period from January 1, 2020, through December 31, 2069 (FCGMA 2019). Because water years 2020, 2021, and 2022 were incorporated into the historical modeling, the future scenarios were updated to begin in water year 2023.

5.2.1.2 Updated Baseline Extraction Rates

The future baseline groundwater extraction rates used for periodic evaluation modeling are equal to the 2016 to 2022 average[19], adjusted monthly by estimates of future surface water, imported water, and recycled water availability. Groundwater extractions over this period consist of both reported and estimated extractions. Estimated extractions were based on available automated metering infrastructure (AMI) data for wells with missing extraction reports (for example, see FCGMA 2023). The 2016 to 2022 average groundwater extraction rates reflect current usage trends in the Subbasin, which have been impacted by the availability of new sources of recycled water,

[18] 23 CCR §354.18 - California Code of Regulations Title 23 Waters, Division 2 Department of Water Resources, Chapter 1.5 Groundwater Management, Subchapter 2 Groundwater Sustainability Plans, Section 354.18 Water Budget

[19] Water year 2020 was not included in the calculation. FCGMA transitioned extraction reporting from calendar year to water year in 2020; therefore 2020 extraction reporting only spanned 9 months (January 1 through September 30).

availability of Santa Clara River water, and the implementation of FCGMA's new fixed extraction allocation system (Section 4.2.2.1, Section 3.1).

Comparison to the GSP Modeling

For the GSP, the future baseline extraction rates were equal to the average 2015 to 2017 extraction rates, adjusted by estimates of future surface water, imported water, and recycled water availability. During the 2015 to 2017 period, surface water supplies in the Subbasin consisted exclusively of Conejo Creek Project water delivered by CWD to PVCWD (FCGMA 2019). Santa Clara River water, which historically provided an average of approximately 9,800 AFY for use in lieu of groundwater, was not available during this period due to drought conditions. The updated Future Baseline groundwater extractions for the Subbasin averaged approximately 68,300 AFY, or approximately 300 AFY higher than the Future Baseline extraction rates used in the GSP.

5.2.1.3 Updated Hydrology

The future hydrology used for this periodic evaluation modeling is the 1933 through 1979 hydrology, adjusted by DWR's 2070 central tendency climate change factors, with the noted exception that water year 1933 hydrology was replaced with water year 1978 hydrology.

Water year 1933 hydrology was approximately 15% drier than the long-term historical average. Conversely, precipitation measured in water year 2023 in the Subbasin was approximately 65% higher than the long-term historical average, and the volume of Santa Clara River water diverted for recharge in the Forebay Management Area was approximately 230% of the long-term historical average (Section 4.2.2). To represent the wet 2023 water year in the future projections, the hydrologic record for water year 1933 was replaced with the hydrologic record for water year 1978. Water year 1978 was selected because flows available for diversion from the Santa Clara River were similar to those in water year 2023.

The resulting 47-year hydrologic record includes drier-than-average periods (e.g., 1944 through 1951) as well as wetter-than-average periods (e.g. 1933 through 1939). The average annual precipitation during this period is similar to the long-term historical average annual precipitation measured in the Subbasin.

Comparison to the GSP Modeling

The future scenarios developed for the GSP used hydrology measured during the 1930 to 1979 period, adjusted by DWR's 2070 central tendency climate change factors. This hydrology represented the future hydrology for the period from January 1, 2020, through December 31, 2069 (FCGMA 2019). The hydrology used for this periodic evaluation modeling is consistent with the hydrology used for the GSP, with the noted exception that water year 1933 hydrology was replaced with water year 1978 hydrology.

5.2.1.4 Future Projects and Water Supply

In 2023, FCGMA adopted a process for evaluating water supply and infrastructure projects in the Subbasin. As part of this process, FCGMA solicited project information from project proponents to evaluate, rank, and prioritize projects for funding and incorporation into the GSP modeling. A full summary of project information solicited through this process is included in Section 3, Status of Projects and Management Actions.

The suite of projects incorporated into the future scenario modeling is summarized in Table 5-1, Projected Future Water Supplies and Projects in the Subbasin, Pleasant Valley Basin, and West Las Posas Management Area of the Las Posas Valley Basin and in Section 5.2.2. Because the VRGWFM spans the entirety of the Subbasin, PVB, and WLPMA, Table 5-1 includes existing and planned projects applicable to each basin. Similarly, the water supply estimates shown in Table 5-1 include each project's anticipated total water supply, a portion of which may be used in the Subbasin.

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Table 5-1. Projected Future Water Supplies and Projects in the Subbasin, Pleasant Valley Basin, and West Las Posas Management Area of the Las Posas Valley Basin

Source of Future Water Supply	Existing Projects and Programs				Planned Water Supply Projects			
	Description	Project Proponent	Applicable Basin(s)	Projected Future Water Supply / In Lieu Delivery (AFY)	Project Name or Description	Project Proponent	Applicable Basin(s)	Projected Future Water Supply / In Lieu Delivery (AFY)
Santa Clara River[a]	MAR	UWCD	Ox	51,900				
	PTP	UWCD	Ox	5,300				
	PVP	UWCD	Ox, PV	5,400				
					Freeman Expansion	UWCD	Ox, PV	6,800
Imported Water	CMWD Deliveries	CMWD	PV	8,700				
		CMWD	Ox	13,900				
	Groundwater Pumped from ASRV and Used in PVB	CWD	PV	1,600				
	Groundwater Pumped from Tierra Rejada and Used in PVB	CWD	PV	200				
					Purchase of Imported water from CMWD for Basin Replenishment	—	WLPMA	1,762
City of Oxnard AWPF	Deliveries to AG Operators and PVCWD[b]	City of Oxnard	Ox, PV	1,500				
	Laguna Road Recycled Water Interconnect	UWCD	Ox, PV	Unknown[c]				
					AWPF Expansion[c]	City of Oxnard	Ox, PV	7,500 - 10,000
					Aquifer Storage and Recovery Program	City of Oxnard	Ox	Unknown[c]
					Injection Barrier	City of Oxnard	Ox	Unknown[c]
Conejo Creek	Conejo Creek Project	CWD	Ox, PV	4,400				
	CWD Deliveries	CWD	PV	2,900				
Camrosa Water Reclamation Facility	Recycled Water Delivered to AG & M&I Operators in Pleasant Valley	CWD	PV	400				
	Recycled Water Delivered to PVCWD	CWD	Ox, PV	800				
Camarillo Sanitary District Water Reclamation Plant	Recycled Water Deliveries to PVCWD	City of Camarillo	Ox, PV	1,400				
	Recycled Water Deliveries to AG and M&I within the City of Camarillo	City of Camarillo	PV	2,300				
Treated Brackish Water					Extraction Barrier Brackish Water Treatment Project (EBB)	UWCD	Ox, PV	5,000
	North Pleasant Valley Desalter Project	City of Camarillo	PV	-4,500[d]				
Demand Reduction	Water Delivery Infrastructure Improvements	ZMWC	WLPMA	500				
					Temporary Voluntary Fallowing	FCGMA	Ox	504[e]
						FCGMA	PV	2,407[e]
Total Anticipated Water Supply from Existing Projects (AFY)				96,700	Total Anticipated Water Supply from Future Projects (AFY)			23,973 – 26,473

Notes: UWCD = United Water Conservation District; CMWD = Calleguas Municipal Water District; CWD = Camrosa Water District; FCGMA = Fox Canyon Groundwater Management Agency; ZMWC = Zone Mutual Water Company; PTP = Pumping Trough Pipeline; PVP = Pleasant Valley Pipeline; AWPF = Advanced Water Purification Facility; ASR = Aquifer Storage and Recovery; AG = Agricultural; M&I = Municipal and Industrial; Ox = Oxnard Subbasin; PV = Pleasant Valley Basin; WLPMA = West Las Posas Management Area of the Las Posas Valley Basin

a Includes supplemental State Water Project water diverted by UWCD at the Freeman Diversion. Under Future Baseline conditions, UWCD anticipates that the long-term availability of supplemental State Water Project water will average approximately 6,000 AFY.

b Under existing FCGMA program (Resolution 23-02).

c The City of Oxnard has identified AWPF water as a water supply for these projects. However, the availability and volume of AWPF water for each project has not yet been defined.

d Project is designed to extract 4,500 AFY of brackish groundwater from the northern portion of PVB. The City of Camarillo intends to treat and serve this water in lieu of imported water.

e Represents temporary demand reduction, not a temporary increase in water supply.

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5.2.2 Projected Water Budgets

Five model scenarios were developed for this periodic evaluation in accordance with the SGMA guidelines, and consistent with the GSP, to evaluate the future sustainable yield of the Subbasin. These scenarios are:

- Future Baseline Scenario
- NNP Scenario
- Projects Scenario
- Basin Optimization Scenario
- EBB Water Treatment Project Scenario

Each scenario covers the 47-year period from October 1, 2022, through September 30, 2069 (i.e., water year 2023 through water year 2069). Consistent with the GSP, the period from 2023 through 2039 is referred to as the "implementation period" and the period from 2040 to 2069 is referred to as the "sustaining period." The sustainable yield was evaluated using the model runs that resulted in: (1) no net flux of seawater into either the UAS or LAS, and (2) no landward migration of the saline water impact front. Both metrics were evaluated over the 30-year sustaining period, with consideration of the uncertainty in Coastal Plain Model's predictions (FCGMA 2019).

Because the Subbasin is hydrogeologically connected to the PVB and the WLPMA, the sustainable yield of the Subbasin is influenced by groundwater conditions in these adjacent basins. The Coastal Plain Model includes both the PVB and the WLPMA in the model domain, and the modeling assumptions associated with each scenario discussed below include the assumptions made for these adjacent basins.

5.2.2.1 Evaluation Metrics

A total of eight (8) model runs were completed under the five scenarios referenced above. Results from each model run were analyzed to characterize the effects of different pumping distributions, projects, and management actions on seawater flux into the Subbasin, the landward migration of the saline water impact front, and groundwater conditions in the adjacent basins. The methods for calculating seawater flux, landward migration of the saline water impact front, and impacts to adjacent basins are summarized below.

5.2.2.1.1 Seawater Flux and Landward Migration of the Saline Water Impact Front

The VRGFWM provides an estimate of the volume of water entering and leaving the Subbasin along the coastline on a monthly timescale. This estimate was evaluated along four coastal segments: (1) from the northern boundary of the Subbasin, south to Channel Islands Harbor, (2) Channel Islands Harbor to Perkins Road, which is south of Port Hueneme, (3) Perkins Road to Arnold Road, and (4) Arnold Road to Point Mugu (Figure 5-1, Modeled Seawater Flux Coastal Segments). The combined flow from Channel Islands Harbor to Point Mugu (segments 2 through 4) represents the approximate coastal boundary of the Saline Intrusion Management Area and the portion of the Subbasin that has historically been impacted by seawater intrusion (FCGMA 2019).

Net seawater flux for each model run was calculated by averaging the annual flow of seawater into the Subbasin south of Channel Islands Harbor during the sustaining period. Net seawater flux was calculated separately for both the UAS and LAS to develop an estimate of sustainable yield by aquifer system.

The landward migration of the saline water impact front was characterized using particle tracking for a subset of the model runs. Initial particle positions were set along the current interpretation of the 2020 saline water impact front in each aquifer. The particles were released at the start of the model simulation to provide a 50-year trajectory of the saline water migration throughout the Subbasin.

Particle tracks were analyzed concurrently with the estimates of seawater flux to characterize the likelihood of ongoing landward migration of saline water and seawater intrusion over the 30-year sustaining period.

Scenarios with UWCD's EBB Project

The approach for evaluating seawater intrusion in the Subbasin differs between the scenarios that do and do not include UWCD's EBB project. This approach is described in detail in Section 5.2.2.6, Extraction Barrier and Brackish Water Treatment Scenario.

5.2.2.1.2 Impacts of Pleasant Valley Basin and West Las Posas Management Area on Seawater Intrusion in the Oxnard Subbasin

The Coastal Plain Model simulates underflows between the Subbasin, PVB, and WLPMA. Results from the Coastal Plain Model were used to calculate the average underflows across each boundary, and by aquifer system, during the 30-year sustaining period to characterize the impacts of pumping, projects, and management actions implemented in one basin on groundwater conditions in an adjacent basin.

5.2.2.2 Future Baseline Model Scenario

SGMA requires that the GSP include an assessment of "future baseline" conditions. The Future Baseline scenario developed for this periodic evaluation built on the GSP modeling and was designed to assess whether current groundwater extractions from the Subbasin, PVB, and WLPMA of the LPVB are sustainable. To do this, the average annual 2016 to 2022 extraction rates, adjusted by surface water and recycled deliveries, were simulated. Future surface water deliveries were estimated by UWCD using their Surface Water Distribution Model (UWCD 2021f) with the GSP evaluation hydrology (Section 5.2.1.3). Estimates of recycled water available for use in lieu of groundwater were provided by the City of Camarillo, CWD, and the City of Oxnard. In addition, the Future Baseline Scenario included all existing projects that are either funded or currently under construction in the Subbasin (Table 5-1).

Adjusting the 2016 to 2022 average groundwater extractions by projected surface water and recycled water supplies leads to an average annual groundwater extraction rate over the sustaining period of approximately 68,300 AFY in the Subbasin, 13,900 AFY in the PVB, and 13,500 AFY in the WLPMA.

5.2.2.2.1 Future Baseline Model Assumptions

The Future Baseline model simulation assumptions included the following:

- Average annual extractions from the Subbasin equal to the 2016 to 2022 average, adjusted by surface water, imported water, and recycled water availability.
- Starting groundwater levels equal to the September 30, 2022, groundwater levels from the Coastal Plain Model.
- Precipitation and streamflow for the 1933 to 1979 period, adjusted by DWR's 2070 central tendency climate change factors, with 1933 hydrology replaced by 1978 hydrology (Section 5.2.1.3).

- Estimates of surface water availability for diversion prepared by UWCD using the periodic GSP evaluation hydrology and calculated using their Surface Water Distribution Model.
- Estimates of recycled water availability provided by the City of Oxnard, City of Camarillo, and CWD.
- Inflows to PVB along Arroyo Las Posas extracted from the East Las Posas Management Area model.

In addition to these assumptions, all existing projects in the Subbasin were included in the Future Baseline model scenario (Table 5-1).

5.2.2.2.2 Future Baseline Model Results

Both the modeled seawater flux into the Saline Intrusion Management Area and the particle tracks from the Future Baseline Scenario indicate that groundwater pumping at the average 2016 to 2022 rate would cause ongoing seawater intrusion to the Subbasin and landward migration of the current saline water impact front (Table 5-2, Summary of Future Scenarios; Figures 5-2 through 5-9). The average annual seawater flux into the UAS and LAS was approximately 2,100 AFY and 3,400 AFY, respectively (Table 5-2). In the UAS and LAS, particle tracks indicate that current saline water impact front would migrate landward (Figures 5-3 through 5-8). Based on these factors, the current areal and aquifer-system distribution of groundwater production at the 2016 to 2022 extraction rates was determined not to be sustainable.

Under the Future Baseline conditions, approximately 1,200 AFY of underflows from PVB recharged the Subbasin. Conversely, approximately 4,400 AFY of underflows from the Subbasin recharged the WLPMA (Table 5-2).

Table 5-2. Summary of Future Scenarios

Future Scenario		Average Annual Rate Over the Sustaining Period (2040 – 2069; AFY)[a]							
		Future Baseline	No New Projects			Basin Optimization	Projects	EBB	
			NNP1	NNP2	NNP3			Baseline	Projects
Groundwater Extractions[b]	UAS	-40,000	-30,700	-34,300	-32,900	-35,200	-39,500	-50,000	-49,400
	LAS	-28,300	-6,800	-2,600[c]	-10,600	-17,100	-26,600	-28,200	-26,400
	Total	**-68,300**	**-37,500**	**-36,900**	**-43,500**	**-52,300**	**-66,100**	**-78,200**	**-75,800**
Seawater Flux into the Subbasin[d]	UAS	2,100	-1,400	-1,500	-800	-400	1,300	6,900	6,200
	LAS	3,400	500	200	1,000	1,100	2,900	4,000	3,400
	Total	**5,500**	**-900**	**-1,300**	**200**	**700**	**4,200**	**10,900**	**9,600**
Flux across the Current Saline Water Impact Front in the Subbasin[e]	UAS	—	—	—	—	—	—	3,200	3,800
	LAS	—	—	—	—	—	—	500	600
	Total	—	—	—	—	—	—	**3,700**	**4,200**
Underflows from PVB to the Subbasin	UAS	900	900	800	900	900	1,600	1,100	1,800
	LAS	300	-1,200	-2,000	-1,000	-1,000	600	500	900
	Total	**1,200**	**-300**	**-1,200**	**-100**	**-100**	**2,200**	**1,600**	**2,700**
Underflows from WLPMA to the Subbasin	UAS	-4,900	-3,500	-3,800	-3,800	-4500	-4,400	-5,000	-4,500
	LAS	500	-1,000	-1,800	-800	300	700	500	800
	Total	**-4,400**	**-4,500**	**-5,600**	**-4,600**	**-4,200**	**-3,700**	**-4,500**	**-3,700**

Notes: NNP = No New Projects; AFY = Acre-Feet per Year; PVB = Pleasant Valley Basin; WLPMA = West Las Posas Management Area of the Las Posas Valley Basin

a Negative (-) values denote discharges, or outflows, from the Subbasin. Positive (+) values denote recharge, or inflows, to the Subbasin.

b Represents groundwater production from the Subbasin.

c In the NNP2 scenario, groundwater production from the LAS of the Subbasin was reduced by 100%. The 2,600 AFY in groundwater production shown here represents pumping from wells screened across both the UAS and LAS – pumping from these wells was reduced by 20%, consistent with the simulated UAS reductions.

d Represents the average annual simulated seawater flux across the coastline south of Channel Islands Harbor.

e Represents sum of fluxes across the interpreted 500 mg/L chloride concentration contour in each principal aquifer. Positive (+) values indicate that fresh groundwater is migrating towards the coast and UWCD's EBB extraction wells. Results are shown only for the EBB scenarios because seawater flux across the coastline in all other scenarios is an indication of ongoing seawater intrusion.

5.2.2.3 No New Projects Model Scenario

The NNP scenario was designed to provide a direct simulation of the areal and aquifer-system groundwater pumping distributions that limit seawater flux into the Subbasin and the landward migration of the 2020 saline water impact front. Three separate model runs were conducted under the NNP scenario: NNP1, NNP2, and NNP3. Each model run incorporated all the assumptions included in the Future Baseline scenario (Section 5.2.2.2) but used different sets of assumptions for groundwater production.

The NNP Scenario model runs evaluated different pumping distributions and reductions to provide the FCGMA Board of Directors information to evaluate potential future management actions. While the simulated pumping reductions provide an estimate of the sustainable yield of the Subbasin, operation within the estimated sustainable yield likely will require development of additional projects and policies that equitably distribute impacts across operators in the Subbasin. Additionally, and importantly, FCGMA and other agencies in the Subbasin are actively pursuing the development of water supply projects aimed at increasing the sustainable yield of the Subbasin.

5.2.2.3.1 No New Projects Scenario Assumptions

As described above, the NNP Scenario included all the assumptions from the Future Baseline Scenario, except for the distribution of groundwater production. Groundwater production distributions were adjusted by basin and aquifer system in each of the three model runs. The specific distributions used in each model run are described below.

No New Projects 1

The NNP1 model run incorporated a 20% reduction in pumping in the UAS of the Subbasin, an 80% reduction in pumping in the LAS of the Subbasin, and a 20% reduction in pumping from both aquifer systems in the PVB and WLPMA of the LPVB (Table 5-2). This reduction in groundwater production, adjusted by surface and recycled water availability, results in an average annual groundwater production rate of approximately 37,500 AFY in the Subbasin, 12,100 AFY in the PVB, and 10,800 AFY in the WLPMA. The NNP1 pumping distribution is equal to the estimates of future sustainable yield presented in the GSP, adjusted by surface and recycled water availability (FCGMA 2019).

No New Projects 2

The NNP2 model run was designed to evaluate the impacts of pumping in the PVB and WLPMA on seawater flux in the LAS of the Subbasin. To do this, a 10% reduction in pumping was implemented in the UAS of the Subbasin, a 100% reduction in pumping was implemented in the LAS of the Subbasin, and no pumping reductions were implemented in the PVB and WLPMA of the LPVB. Implementing this reduction in groundwater production results in an average annual groundwater production rate of approximately 36,900 AFY in the Subbasin, 13,100 AFY in the PVB, and 13,500 AFY in the WLPMA.

No New Projects 3

The NNP3 model run was designed to evaluate future groundwater conditions in the Subbasin if pumping was reduced to a revised estimate of the sustainable yield of the Subbasin. The NNP3 scenario incorporated a 15% reduction in pumping in the UAS of the Subbasin, a 65% reduction in pumping in the LAS of the Subbasin, and a 15% reduction in pumping in both aquifer systems of the PVB and WLPMA (Table 5-2). Implementing this reduction in groundwater production results in an average annual groundwater production rate of approximately 43,500 AFY in the Subbasin, 12,400 AFY in the PVB, and 11,400 AFY in the WLPMA.

5.2.2.3.2 No New Projects Scenario Model Results

No New Projects 1

In the NNP1 scenario, approximately 1,400 AFY of groundwater discharged to the Pacific Ocean through the UAS south of Channel Islands Harbor, and approximately 500 AFY of seawater entered the Subbasin through the LAS south of Channel Islands Harbor (Table 5-2, Figures 5-2, Seawater Flux in the LAS: Future Model Scenarios without UWCD's EBB Project, and 5-3, Seawater Flux in the LAS: Future Model Scenarios without UWCD's EBB Project). Particle tracks were not conducted for this model run.

The NNP1 pumping distribution resulted in approximately 2,200 AFY of underflows from the LAS of the Subbasin to the LPVB and PVB (Table 5-2). This is a change in both the direction and magnitude of LAS underflows, compared to the Future Baseline Scenario. This represents a loss of approximately 3,000 AFY in LAS underflow recharge to the Subbasin, compared to the Future Baseline Scenario. In the UAS, the NNP1 pumping distribution resulted in a reduction in underflows to the LPVB of approximately 500 AFY and resulted in no net change in the volume of underflows from the PVB. The change in underflows in the UAS were less than those simulated in the LAS.

No New Projects 2

The NNP1 model simulation indicates that pumping in the PVB and LPVB influences seawater flux into the Subbasin by capturing underflows that would otherwise be recharging the Subbasin. The effects of this are more pronounced in the LAS, where differential reductions in pumping between the Subbasin, PVB, and WLPMA result in a change in the direction and magnitude of underflows between basins. To better characterize this process, the NNP2 simulation included a complete reduction in pumping in the LAS of the Subbasin while maintaining groundwater production in the PVB and WLPMA at the Future Baseline rates.

The NNP2 pumping distribution resulted in approximately 3,800 AFY of underflows from the LAS of the Subbasin to the WLPMA and PVB (Table 5-2). This represents a loss of approximately 4,600 AFY in underflow recharge to the LAS of the Subbasin compared to the Future Baseline scenario. Additionally, the NNP2 pumping distribution resulted in a 70% increase in the volume of underflows from the LAS of the Subbasin to the WLPMA and PVB, compared to the NNP1 scenario. In the UAS, the NNP2 pumping distribution resulted in a reduction in underflows to the WLPMA of approximately 1,100 AFY and a reduction in underflows from the PVB of approximately 100 AFY (Table 5-2).

In the NNP2 simulation, approximately 1,500 AFY of groundwater discharged to the Pacific Ocean through the UAS south of Channel Islands Harbor and approximately 200 AFY of seawater entered the Subbasin through the LAS south of Channel Islands Harbor (Table 5-2; Figures 5-2 and 5-3). Particle tracks were not conducted for this model run.

No New Projects 3

In the NNP3 model run, approximately 800 AFY of groundwater discharged to the Pacific Ocean through the UAS south of Channel Islands Harbor and approximately 1,000 AFY of seawater entered the Subbasin through the LAS south of Channel Islands Harbor (Table 5-2; Figures 5-2 and 5-3). Compared to the NNP1 simulation, this represents a 40% reduction in the volume of groundwater lost to the Pacific Ocean through the UAS and provides a similar estimate of seawater flux into the LAS, given the uncertainty in the Coastal Plain Model predictions (FCGMA 2019).

Particle tracks indicate that the NNP3 pumping distribution results in a recession of the saline water impact front in the Oxnard aquifer (Figure 5-10, UWCD Model Particle Tracks, Oxnard Aquifer, NNP3). Similarly, south of Casper Road, particle tracks show no landward migration of the saline water impact front in the Mugu aquifer (Figure 5-11). In the northern portion of the saline water impact front in the Mugu aquifer, the NNP3 pumping distribution reduced saline water migration by approximately 50% (Figure 5-11, UWCD Model Particle Tracks, Mugu Aquifer, NNP3).

In the LAS, the NNP3 pumping distribution does not fully mitigate the landward migration of the saline water impact front, except in the GCA. In the Hueneme aquifer, particle tracks show ongoing landward migration over the entire 47-year simulation period; however, the particle trajectories in the NNP3 scenario are approximately 40% shorter than the Future Baseline Scenario (Figures 5-11 and 5-6, UWCD Model Particle Tracks, Hueneme Aquifer, Future Baseline). In the upper and basal FCA, the 2020 saline water impact front migrated landward by approximately 0.1-miles. This is an approximately 80% reduction in the saline water impact front migration within the FCA, and within the model uncertainty (Figures 5-13, 5-14, 5-7, and 5-8).

These particle track and seawater flux results indicate that NNP3 pumping rate and distribution is sustainable, within the uncertainty of the VRGWFM.

The NNP3 pumping distribution resulted in approximately 1,800 AFY of underflows from the LAS of the Subbasin to the WLPMA and PVB (Table 5-2). This represents a loss of approximately 2,600 AFY in underflow recharge to the Subbasin compared to the Future Baseline scenario. However, the reduction in underflows to the Subbasin was approximately 18% and 52% lower than the NNP1 and NNP2 model runs, respectively (Table 5-2). In the UAS, underflows to the PVB and WLPMA were approximately 10% higher than the NNP1 model run and 3% lower than the NNP2 model run (Table 5-2).

5.2.2.4 Basin Optimization Model Scenario

To support effective management of the Subbasin, the GSP established five separate management areas: the Forebay Management Area, the West Oxnard Plain Management Area, the Oxnard Pumping Depression Management Area, the Saline Intrusion Management Area, and the East Oxnard Plain Management Area (Figure 2-2). Results from an initial investigation of the pumping impacts within each management area on seawater flux indicated that the sustainable yield of the Subbasin could be increased by shifting pumping out of the Saline Intrusion and Oxnard Pumping Depression management areas into the West Oxnard Plain and Forebay management areas (Section 4.1.2.3). The Basin Optimization Scenario was developed to integrate these results into the future scenario modeling for the GSP, with the goal of increasing total groundwater production from the Subbasin, PVB, and WLPMA, while maintaining similar estimates of seawater flux and landward migration of the saline water impact front as the NNP3 model run.

The pumping distribution evaluated as part of this Basin Optimization scenario neither represents a commitment by FCGMA to implement a reduction and/or shift in groundwater production. While the simulated pumping scenario provides the foundation on which additional basin optimization strategies can be developed and evaluated, implementing management actions consistent with this scenario would require the development of additional projects that equitably distribute impacts across operators in the Subbasin. Additionally, and importantly, FCGMA and other agencies in the Subbasin are actively pursuing the development of water supply and treatment projects aimed at increasing the sustainable yield of the Subbasin. These projects should be considered in future evaluations of basin optimization strategies.

5.2.2.4.1 Basin Optimization Scenario Assumptions

As described above, the Basin Optimization Scenario included all the assumptions from the Future Baseline Scenario, except for the distribution of groundwater production. Using the results from the Future Baseline Scenario and NNP Scenario, along with the results from FCGMA's initial investigation of management area impacts (Section 4.1.2), the Basin Optimization Scenario implemented:

- A 10% reduction in groundwater production from the UAS of the Subbasin
- A 40% reduction in groundwater production from the LAS of the Subbasin
- A 10% reduction in groundwater production from both aquifer systems of the PVB
- A 10% reduction in groundwater production from both aquifer systems of the LPVB

Importantly, during the sustaining period, all pumping that would have occurred in the Saline Intrusion Management Area and 40% of the pumping that would have occurred in the Oxnard Pumping Depression Management Area, was moved to the West Oxnard Plain Management Area. Implementing this reduction and shift in groundwater production resulted in an average annual groundwater production rate of approximately 52,300 AFY in the Subbasin, 12,900 AFY in the PVB, and 12,200 AFY in the WLPMA.

This scenario did not include any changes to existing land uses in the Subbasin. Therefore, this modeling scenario assumes that implementing pumping shifts across the Subbasin would occur concurrently with the development of infrastructure projects that would deliver water to operators directly impacted by pumping reductions.

5.2.2.4.2 Basin Optimization Scenario Results

In the Basin Optimization Scenario, approximately 400 AFY of groundwater discharged to the Pacific Ocean through the UAS and approximately 1,100 AFY of seawater entered the Subbasin through the LAS (Table 5-2, Figures 5-1, Modeled Seawater Flux Coastal Segments, and 5-2, Seawater Flux in the UAS: Future Model Scenarios without UWCD's EBB Project). These estimates are similar to the seawater flux values estimated in the NNP3 simulation and are within the quantitative uncertainty of the VRGWFM.

Particle tracks show a similar recession of the saline water impact front in the Oxnard aquifer (5-16, UWCD Model Particle Tracks, Oxnard Aquifer, Basin Optimization). In the Mugu aquifer, the Basin Optimization Scenario pumping distribution reduced the landward migration of the saline water impact front compared to the NNP3 simulation (Figure 5-17, UWCD Model Particle Tracks, Mugu Aquifer, Basin Optimization). In the Hueneme aquifer, FCA, and GCA, particle tracks show similar trajectories of the saline water impact fronts within each aquifer (Figures 5-18 through 6-22). Therefore, the particle tracks and simulated seawater flux values indicate that an average annual production rate of approximately 52,300, under the Basin Optimization distribution, is sustainable.

The Basin Optimization Scenario pumping distribution resulted in approximately 1,000 AFY of underflows from the LAS of the Subbasin to the PVB. Underflows from the LAS of the WLPMA to the Subbasin were approximately 200 AFY less than the Future Baseline Scenario. The combined underflows in the LAS represent a loss of approximately 1,500 AFY in underflow recharge to the Subbasin compared to the Future Baseline scenario. This is approximately

45% lower than the NNP3 simulation (Table 5-2). Recharge from underflows in the UAS increased by approximately 400 AFY (Table 5-2).

5.2.2.5 Projects Scenario

Modeling of future conditions in the Projects Scenario included all the assumptions incorporated in the Future Baseline Scenario, and also included UWCD's Freeman Expansion project, FCGMA's Voluntary Temporary Fallowing Project, and in-lieu delivery and infrastructure improvement projects in the WLPMA (Table 5-2). Due to uncertainty in the planned use of the future AWPF water, the City of Oxnard's AWPF Expansion project was not incorporated into the Projects Scenario. Additionally, UWCD's EBB Water Treatment project was not included in the Projects Scenario, but rather, was evaluated in a separate scenario to account for the impacts of this project on groundwater elevations and seawater flux along the coast (Section 5.2.2.6 Extraction Barrier and Brackish Water Treatment Scenario).

Incorporation of the potential future projects in the Projects Scenario neither represents a commitment by FCGMA to impose pumping reductions nor a commitment to move forward with each project included in the future model scenario.

5.2.2.5.1 Projects Scenario Assumptions

In the Subbasin, simulated future projects included UWCD's Freeman Diversion Expansion project, which, under the projected future hydrology, would increase Santa Clara River water diversions by approximately 6,800 AFY compared to Future Baseline conditions. UWCD anticipates delivering a portion of this water to users on their pipelines and recharging a portion of this water in the Forebay (Table 5-2). The timing and volume of pipeline deliveries and recharge was determined by UWCD using their Surface Water Distribution Model.

Two voluntary temporary fallowing projects were modeled in the Projects Scenario. In the Subbasin, a 504 AFY reduction of pumping was simulated. In the PVCWD service area, a voluntary temporary fallowing program was simulated using a 2,407 AFY reduction in agricultural water demands, which consists of both surface water, recycled water, and groundwater. To do this, agricultural water demands were reduced uniformly and proportionally in the PVCWD service area, and UWCD's Surface Water Distribution Model was used to estimate the resulting reduction in groundwater pumping. These projects are discussed in detail in Section 3.1.

In the WLPMA, future projects included the purchase of 1,762 AFY of water to be delivered to the eastern portion of the WLPMA in lieu of groundwater extraction and infrastructure improvements to Zone Mutual Water Company's distribution network, which are anticipated to reduce groundwater demands by approximately 500 AFY. The combination of these projects results in a reduction in pumping of 2,262 AFY. Simulated pumping was reduced uniformly and proportionally at Zone Mutual Water Company and Ventura County Waterworks District-19 wells located in the WLPMA.

After incorporating the potential future projects, the average groundwater production rate for the UAS in the Subbasin was 39,500 AFY and the average groundwater production rate for the LAS in the Subbasin was 26,600 AFY for the Projects Scenario. In the PVB, the average groundwater production rate was 4,100 AFY in the UAS and 8,900 AFY in the LAS. In the WLPMA, the average production rate in the LAS was 11,400 AFY.

5.2.2.5.2 Projects Scenario Results

In the Projects Scenario, groundwater production from the Subbasin at a rate of approximately 66,100 AFY resulted in seawater flux into both the UAS and LAS of the Subbasin (Table 5-2). In the UAS, the seawater flux averaged approximately 1,300 AFY over the sustaining period, and in the LAS, the seawater flux averaged approximately 2,900 AFY over the sustaining period. These results indicate that implementation of UWCD's Freeman Expansion Project, FCGMA's temporary voluntary fallowing project, and ZMWC's infrastructure improvement and in-lieu delivery project would result in a 24% decrease in total seawater flux, compared to the Future Baseline Scenario. The majority of these benefits would occur in the UAS (Table 5-2).

Implementation of these three projects in the Subbasin, PVB, and WLPMA, without any additional demand reduction actions, results in an increase in underflows from the PVB and WLPMA. In the LAS, underflows from the PVB and WLPMA increased by approximately 500 AFY (Table 5-2). In the UAS, underflows to the WLPMA and PVB decreased by approximately 1,200 AFY (Table 5-2). These underflows help to reduce the seawater flux into the Subbasin.

5.2.2.6 Extraction Barrier and Brackish Water Treatment Scenario

UWCD is designing and implementing an EBB Water Treatment Project to create a seawater intrusion barrier at NBVC Point Mugu. UWCD intends to operate the project by extracting brackish groundwater from the Oxnard and Mugu aquifers near the coast, creating a pumping trough that helps prevent landward migration of saline water throughout the Subbasin. Because successful implementation and operation of this project will intentionally lower groundwater elevations along the coastline, thereby inducing seawater flux along the coast, a separate set of model simulations were conducted to evaluate this project.

Two model runs were conducted under this scenario:

- Future Baseline with EBB
- Projects with EBB

The assumptions used for each model run are described below. The pumping distributions evaluated in the EBB Water Treatment Scenario neither represent a commitment by FCGMA to impose pumping reductions or projects nor a commitment to move forward with specific pumping reduction scenarios or projects.

5.2.2.6.1 EBB Water Treatment Scenario Assumptions

Simulation of UWCD's EBB Water Treatment project included the following:

- A total of ten (10) EBB extraction wells screened in the Oxnard aquifer, pumping at a combined rate of approximately 5,000 AFY over the 30-yr sustaining period.
- A total of ten (10) EBB extraction wells screened in the Mugu aquifer, pumping at a combined rate of approximately 5,000 AFY over the 30-year sustaining period.

Consistent with the current project understanding (Section 3.1.1), implementation of the EBB Water Treatment Project occurred in two phases:

- Phase I (Water Year 2028 through Water Year 2030): 2,500 AFY of production from 5 wells screened in the Oxnard aquifer, and 1,000 AFY of production from 2 wells screened in the Mugu aquifer.

- Phase I (Water Year 2031 through Water Year 2069): 5,000 AFY of production from 10 wells screened in the Oxnard aquifer, and 5,000 AFY of production from 10 wells screened in the Mugu aquifer.

Based on the current project understanding, it was assumed that 50% of the brackish water treated as part of the EBB project would be made available for delivery and use in the Subbasin. Of this, UWCD anticipates delivering approximately 1,500 AFY to NBVC and delivering the remaining 3,500 AFY either to operators in the Subbasin or to the Forebay for additional recharge. For simplicity in both the Future Baseline with EBB and Projects with EBB scenario, it was assumed that the 3,500 AFY of treated EBB water was recharged in the Forebay Management Area. The addition of a consistent source of recharge to the Forebay through this project resulted in an increase in the availability of Santa Clara River water for delivery to users on the PTP and PVP.

Future Baseline with EBB Model Simulation

The Future Baseline with EBB simulation included all the assumptions from the Future Baseline Scenario, and also included the full implementation of UWCD's EBB Water Treatment Project. Including UWCD's EBB Water Treatment Project resulted in a total groundwater production rate of 78,200 AFY in the Subbasin (10,000 AFY of which are from UWCD's EBB extraction wells), 13,800 AFY from the PVB, and 13,500 AFY from the WLPMA.

Projects with EBB Model Simulation

The Projects with EBB simulation included all the assumptions from the Projects Scenario, and also included the full implementation of UWCD's EBB Water Treatment Project. The net effects of UWCD's EBB Water Treatment Project, Freeman Diversion Expansion Project, Voluntary Temporary Fallowing Project, and In-Lieu and infrastructure improvement projects in WLPMA resulted in a total groundwater production rate of 75,800 AFY from the Subbasin (10,000 AFY of which are from UWCD's EBB extraction wells), 13,000 AFY from the PVB, and 11,400 AFY from the WLPMA.

5.2.2.6.2 EBB Water Treatment Scenario Model Results

Because UWCD's EBB project is designed to increase seawater flux into the Subbasin, groundwater sustainability was evaluated by calculating the simulated flows across the current inland extent of saline water impact in the UAS and LAS of the Subbasin. The average annual flows across these boundaries for the 30-year sustaining period were used to characterize the pumping rates, projects, and management actions that would result in no net landward movement of the current saline water extents.

Like some of the scenarios that do not include UWCD's EBB projects, the net flow estimates were analyzed concurrently with particle tracks to characterize the trajectory of the saline water impact front over the sustaining period.

Future Baseline with EBB

In the Future Baseline with EBB scenario, approximately 3,200 AFY of groundwater flowed across the current inland extent of saline water impact in the UAS, towards the coast. This flow direction indicates that, under Future Baseline conditions, operation of UWCD's EBB project did not result in a net landward migration of saline water throughout the UAS over the 30-year sustaining period. Particle tracks show a recession in the saline water impact front in the UAS, and corresponding capture of groundwater that migrates towards the coast by UWCD's EBB extraction wells (Figures 5-21, UWCD Model Particle Tracks, Grimes Canyon Aquifer, Basin Optimization, and 5-22, UWCD Model Particle Tracks, Oxnard Aquifer, Future Baseline with EBB).

Over the sustaining period, approximately 500 AFY of groundwater flowed across the current inland extent of saline water impact in the LAS, towards the coast (Table 5-2). This suggests that, under the Future Baseline conditions, while UWCD's EBB project does not include any dedicated extraction wells in the LAS, operation of the UAS extraction wells limit the landward migration of saline water throughout the LAS. This interpretation is consistent with particle tracks that shows a recession of the saline water impact front, particularly near Point Mugu (Figures 5-23, UWCD Model Particle Tracks, Mugu Aquifer, Future Baseline with EBB; and 5-26, UWCD Model Particle Tracks, Basal Fox Canyon Aquifer, Future Baseline with EBB). Particle tracks suggest some inland migration in the Hueneme aquifer near Port Hueneme (Figure 5-24, UWCD Model Particle Tracks, Hueneme Aquifer, Future Baseline with EBB). Presently, there are no wells in this vicinity to monitor the actual saline front. Although modeled particle tracks indicate inland migration of approximately 0.75 miles over the 30-year sustaining period, the closest wells screened across the Hueneme aquifer are still more than 1.5 miles from the modeled inland saline intrusion extent.

These results indicate that groundwater production at the average 2016 to 2022 rates in the Subbasin, PVB, and WLPMA may be sustainable if UWCD's EBB project is implemented at a 10,000 AFY production scale.

Projects with EBB

In the Projects with EBB scenario, approximately 3,800 AFY of groundwater flowed across the current inland extent of saline water impact in the UAS, towards the coast. This is an increase in the coastward flow of approximately 20% compared to the Future Baseline with EBB simulation. Like the Future Baseline with EBB simulation, this indicates that operation of UWCD's EBB project will limit the landward migration of saline water throughout the UAS over the 30-year sustaining period. This is consistent with particle tracks that show a recession in the saline water impact front in the UAS, and corresponding capture at UWCD's EBB extraction wells (Figures 5-27, Future Baseline with EBB Scenario, Grimes Canyon Aquifer; and 5-28, UWCD Model Particle Tracks, Oxnard Aquifer, Projects with EBB).

Over the sustaining period, approximately 600 AFY of groundwater will flow across the current inland extent of saline water impact in the LAS, towards the coast. Like the Future Baseline with EBB scenario, this suggests that, while UWCD's EBB project does not include any dedicated extraction wells in the LAS, operation of the UAS extraction wells will result in the vertical migration of flow from the LAS to UAS, limiting the landward migration of saline water throughout the LAS. This interpretation is consistent with particle tracks that shows a recession of the saline water impact front, particularly near Point Mugu (Figures 5-29 through 5-32). The one exception to this is in the Hueneme aquifer near Port Hueneme, where the particle trajectories under the Projects with EBB scenario were similar to those in the Future Baseline with EBB scenario.

5.2.3 Estimates Of the Future Sustainable Yield

The primary sustainability goal of the Subbasin is to increase groundwater elevations to elevations that will prevent long-term, or climatic-cycle net, landward migration of the saline water impact front and prevent net seawater intrusion into the UAS and LAS (FCGMA 2019). To ensure that the Subbasin is managed under conditions that will achieve and maintain this goal, the sustainable yield for the Subbasin was estimated by examining the modeled flux of seawater into the Subbasin, south of Channel Islands Harbor, over the 30-year sustaining period. The sustaining period was assessed because SGMA recognizes that undesirable results may occur during the 20-year implementation period, as basins move toward sustainable groundwater management. In addition to the flux of seawater, particle tracks from the model runs were analyzed to evaluate the potential migration of the current extent of saline water impact in the UAS and the LAS. As described in Section 5.2.2.1, the particles were placed along the approximate inland extent of the zone of saline water impact in 2020. Scenarios that minimize the net flux of seawater into the Subbasin and the landward migration of the saline water impact front over the 30-year sustaining period are sustainable for the Subbasin, while those that allow for net seawater intrusion and landward migration of the saline water impact front are not. Estimates of sustainable yield are summarized by aquifer system, rather than for the Subbasin as a whole, because the aquifer systems experience different levels of overdraft.

Sustainable Yield without Future Projects

All three simulations performed under the NNP Scenario reduced seawater intrusion in the LAS during the 30-year sustaining period and resulted in net freshwater loss from the UAS to the Pacific Ocean. Therefore, the simulation with the highest overall production rate, that also minimized impacts from adjacent basins, was identified as the best estimate of the sustainable yield of the Subbasin, in the event that no new future projects are implemented in the Subbasin. The simulation with the highest total groundwater production rate from this scenario was NNP3 – under this simulation, an average of approximately 32,900 AFY of groundwater was pumped from the UAS (Section 5.2.2.3). This estimate of the sustainable yield is approximately 900 AFY higher than the estimate presented in the GSP for the UAS (FCGMA 2019). Applying the estimate of sustainable yield uncertainty calculated during development of the GSP for the sustaining period suggests that the sustainable yield of the UAS may be as high as 37,000 AFY or as low as 28,800 AFY (FCGMA 2019).

In the NNP3 simulation, a total of 10,600 AFY of groundwater was pumped from the LAS. This estimate of the sustainable yield for the LAS from NNP3 is approximately 3,600 AFY higher than the estimate presented in the GSP for the LAS (FCGMA). Applying the estimate of sustainable yield uncertainty calculated during development of the GSP for the sustaining period suggests that the sustainable yield of the LAS may be as high as 14,200 AFY or as low as 7,000 AFY (FCGMA 2019).

Over the 2021 to 2022 period, groundwater extractions from the UAS averaged approximately 44,200 AFY (Table 4-4)[20]. This is approximately 7,200 AFY higher than the upper end estimate of sustainable yield for the UAS. Over the 2021 to 2022 period, groundwater extractions from the LAS averaged approximately 30,800 AFY, which is approximately 16,600 AFY higher than the upper end estimate of sustainable yield for the LAS (Table 4-4).

Sustainable Yield with Future Projects

FCGMA and other agencies in the Subbasin have identified, and anticipate implementing, as feasible, additional projects in the Subbasin, PVB, and WLPMA that increase the sustainable yield, provide supplemental water, and/or reduce demand in each basin. In the Projects Scenario, implementation of the suite of projects described above reduced seawater flux into the Subbasin by approximately 800 AFY, or 40%, in the UAS and 300 AFY, or 10%, in the LAS. Based on the relationship between pumping and seawater intrusion in the Future Baseline and NNP scenarios, this may translate into a 2,000 AFY increase in the sustainable yield of the UAS and a 2,700 AFY increase in the sustainable yield of the LAS. Under this scenario, the sustainable yield of the UAS may be as high as 39,000 AFY or as low as 30,800 AFY. Similarly, the sustainable yield of the LAS may be as high as 16,900 AFY or as low as 9,700 AFY.

The Basin Optimization Model Scenario indicates that a project designed to shift pumping in the Subbasin away from the Saline Intrusion and Oxnard Pumping Depression management areas to the West Oxnard Plain

20 Results from the Coastal Plain Model indicate that the majority of groundwater withdrawal from wells screened in multiple or unassigned aquifer occurs through the UAS. Because of this, the pumping from wells screened in multiple or unassigned aquifers was added to the groundwater extractions from wells screened exclusively within the UAS.

Management Area may increase the sustainable yield of the UAS and LAS by approximately 1,100 AFY and 6,500 AFY, respectively. Under this scenario, the sustainable yield of the UAS may be as high as 38,100 AFY or as low as 29,900 AFY. Similarly, the sustainable yield of the LAS may be as high as 20,700 AFY or as low as 13,500 AFY. Additional modeling would be required to evaluate whether or not these benefits are additive to the sustainable yield increases associated with projects that were evaluated in the Projects Scenario.

Sustainable Yield with UWCD's EBB Water Treatment Project

Both simulations conducted under the EBB Water Treatment Scenario limited the landward migration of saline water in the Oxnard aquifer, Mugu aquifer, FCA, and GCA. Because of this, the simulation with the highest overall production rate was used as the estimate of sustainable yield of the Subbasin if UWCD's EBB Water Treatment project is successfully implemented as described in Section 5.2.2.6, Extraction Barrier and Brackish Water Treatment Scenario. The simulation with the highest total groundwater production rate from this scenario was the Future Baseline with EBB simulation – under this simulation, and excluding the extractions from UWCD's EBB extraction wells, an average of approximately 40,000 AFY of groundwater was pumped from the UAS and 28,200 AFY of groundwater was pumped from the LAS (Section 5.2.2.6, Extraction Barrier and Brackish Water Treatment Scenario). This would represent an increase in the sustainable yield of approximately 5,900 AFY in the UAS and 17,600 AFY in the LAS, compared to the scenario in which no new projects are implemented in the Subbasin. The sustainable yield of the basin may be higher than simulated in this exercise depending on the actual conditions encountered during project operation. However, the estimate of the sustainable yield in this exercise was limited to the maximum assumed pumping rate.

Additional Considerations

Particle tracks from the 5-year GSP evaluation modeling indicate that none of the scenarios fully mitigate seawater intrusion in the Hueneme aquifer near Port Hueneme. However, the NNP3, Basin Optimization, and Future Baseline with EBB scenarios were considered sustainable because the particle tracks suggest that the saline water migration would not impact beneficial uses and users of groundwater in the Hueneme aquifer. Over the 47-year period, these three scenarios suggest that the saline water impact front may migrate approximately 0.5 miles inland; the nearest groundwater wells are approximately 1 to 2 miles away from the estimated saline water impact front in 2070 (Figures 5-4 through 5-33).

FCGMA and other agencies will continue to monitor saline water impact in this part of the Subbasin. As necessary and appropriate, FCGMA will evaluate the need to implement new projects and technical studies if beneficial uses and users of groundwater are likely to be impacted by future seawater intrusion in the Hueneme aquifer.

5.2.3.1 Impact of Recycled Water Double Counting on the Estimate of Sustainable Yield

As described in the introduction to Section 5.2, the simulations described above over-represent the volume of recycled water supplies to PVCWD by 1,500 AFY and under-represent the volume of Conejo Creek Project deliveries to PVCWD by 400 AFY. To evaluate the impact of this on the model simulations of future groundwater conditions and estimate of sustainable yield, UWCD, at the request of FCGMA, performed one additional numerical model simulation as part of this periodic evaluation. For this additional model simulation, the Coastal Plain Model was used to re-simulate the NNP3 scenario, with the volumes of recycled water and Conejo Creek Project water deliveries to PVCWD updated using CWD's water supply projections provided to FCGMA on September 16, 2024.

Table 5-3. Comparison of Simulated Groundwater Conditions – No New Projects 3

Water Budget Component	Aquifer System	Average Annual Rate Over the Sustaining Period (2040 – 2069; AFY)[a] NNP3 (Original)	NNP3 (Corrected PVCWD Water Supplies)
Groundwater Extractions[b]	UAS	-32,900	-33,100
	LAS	-10,600	-11,100
	Total	**-43,500**	**-44,200**
Seawater Flux into the Subbasin[c]	UAS	-800	-600
	LAS	1,000	1,200
	Total	**200**	**600**
Underflows from PVB to the Subbasin	UAS	900	600
	LAS	-1,000	-1,100
	Total	**-100**	**-500**
Underflows from WLPMA to the Subbasin	UAS	-3,800	-3,800
	LAS	-800	-800
	Total	**-4,600**	**-4,600**

Notes: NNP = No New Projects; AFY = Acre-Feet per Year; PVB = Pleasant Valley Basin; WLPMA = West Las Posas Management Area of the Las Posas Valley Basin

[a] Negative (-) values denote discharges, or outflows, from the Subbasin. Positive (+) values denote recharge, or inflows, to the Subbasin.

[b] Represents groundwater production from the Subbasin.

[c] Represents the average annual simulated seawater flux across the coastline south of Channel Islands Harbor.

The revised PVCWD water supply projects result in an increase in groundwater production from within the PVCWD service area of 1,100 AFY, approximately 700 AFY of this occurs within the Subbasin (Table 5-3, Comparison of Simulated Groundwater Conditions – No New Projects 3). In the revised model simulation, groundwater extractions from the UAS and LAS are approximately 200 AFY and 500 AFY higher than the original NNP3 scenario (Table 5-3). The increase in groundwater production from within the PVCWD service area results in a 200 AFY decrease in the volume of freshwater that discharges to the Pacific Ocean through the UAS and a 200 AFY increase in the seawater flux into the LAS south of Channel Islands Harbor. These differences in model-estimated coastal flux values between the two NNP3 simulations are within the Coastal Plain Model's predictive uncertainty (FCGMA 2019).

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6 Review of the Sustainable Management Criteria

The GSP established minimum threshold and measurable objective groundwater elevations that minimize seawater intrusion in the Subbasin after 2040. These SMCs were established based on simulation results from the VRGWFM. As noted in Section 5.2, Future Scenario modeling was updated as part of this periodic GSP evaluation. Two model runs were found to be sustainable: the NNP3 model run and Future Baseline with EBB model run.

The design phase of UWCD's EBB project is anticipated to start in water year 2028 and operate for approximately 3 years (Section 3). Data collected during the design phase operation will inform project efficacy and impacts. Full scale implementation of the EBB project will require demonstration that the local increase in extractions from the UAS does not induce vertical migration of contaminants from the semi-perched aquifer down into the drinking water aquifers of the Subbasin. Because full-scale implementation of the EBB project will depend on results from Phase I of the project, the minimum thresholds and measurable objectives recommended for the next 5-years of GSP implementation are the SMCs that do not account for implementation of UWCD's EBB project.

Recommendations for SMCs that account for EBB are discussed in Section 6.3. These SMCs are included to provide a framework for future management objectives in the event that EBB is successfully implemented in the Subbasin. FCGMA and other agencies in the Subbasin will evaluate appropriateness of managing towards these criteria as Phase I of the EBB project is implemented.

6.1 Minimum Thresholds

Consistent with the GSP, the minimum threshold groundwater elevations were evaluated by comparing the GSP-defined minimum threshold groundwater elevations to the lowest simulated groundwater elevation after 2040 from the NNP 3 simulation (Figures 6-1a through 6-6)[21].. Minimum threshold groundwater elevations at nine key wells were found to differ by greater than 5-feet from the simulated groundwater elevations in the NNP 3 scenario. Eight of these wells are located in the Oxnard Pumping Depression Management Area and the Saline Intrusion Management Area (Table 6-1, Minimum Threshold and Measurable Objective Groundwater Elevations for the Oxnard Subbasin). The remaining well is located in the Forebay Management Area (Table 6-1).

The lowest simulated groundwater elevation in the NNP 3 scenario was higher than the GSP minimum threshold in the key wells in the Oxnard Pumping Depression Management Area (Table 6-1). Under the NNP 3 scenario, groundwater production was reduced in the NNP 3 scenario relative to the production in the GSP scenarios. While groundwater production in this area may be reduced in the future, the GSP scenarios, in which groundwater production is higher in this area, were also found to be sustainable. The groundwater elevation minimum thresholds based on these scenarios were found to protect against seawater intrusion in the Oxnard Subbasin, and do not inhibit the ability of the Pleasant Valley Basin to meet its sustainability goal. Because there are multiple paths to sustainability, and no current plans to change the management strategy of the Subbasin based on the updated

21 For the GSP, 2-feet was added to each SMC to account for future sea level rise (FCGMA 2019). The numerical modeling for this periodic GSP evaluation accounts for future sea level rise by simulating sea level rise projected by NASA (2023). Because of this, 2-feet was not added to the recommended revised SMC.

model scenarios run for this periodic evaluation, no changes are recommended to the minimum thresholds in the Pumping Depression Management Area at this time.

In the Saline Intrusion Management Area, the lowest groundwater elevation simulated after 2040 was lower than the minimum threshold groundwater elevation assigned in the GSP. The difference between the GSP minimum threshold and the simulated low groundwater elevation was approximately 7 feet (Table 6-1). This difference is primarily driven by updates to the model layering and improved representation of hydrogeologic connectivity between the UAS and FCA near Point Mugu. FCGMA discussed revising the minimum thresholds in this area as a result of the updated hydrogeologic understanding with stakeholders in the Subbasin. However, changes to the minimum thresholds in the Saline Intrusion Management Area are not recommended at this time for two primary reasons. First, the GSP minimum thresholds are being maintained in the Pumping Depression Management Area. It is not clear that lowering the minimum thresholds at the coast, while simultaneously maintaining lower minimum thresholds in the inland area, would still protect against seawater intrusion. Second, implementation of the EBB project over the next five to ten years will require a substantial revision of the minimum thresholds and measurable objectives in the Oxnard Subbasin. Making minor revisions to the minimum thresholds at a select number of coastal key wells in advance of the evaluation of basin management requirements with implementation of the EBB project adds unnecessary uncertainty to the long-term sustainable management of the Subbasin.

Similar to the Saline Intrusion Management Area, the lowest simulated groundwater elevation from the NNP 3 scenario was lower than the GSP minimum threshold at one key well in the Forebay Management Area (Table 6-1). For the reasons listed above, the GSP minimum threshold in this well will be maintained until a broader evaluation of the management of the basin is undertaken in conjunction with implementation of the EBB project.

Table 6-1. Minimum Threshold and Measurable Objective Groundwater Elevations for the Oxnard Subbasin

SWN	Management Area	Aquifer	Historical Low (ft msl) and Date Measured		Minimum Thresholds and Measurable Objectives Defined in the GSP		Difference in the Minimum Threshold and Measurable Objective Water Levels Between the GSP and the NNP3 Scenario	
					MT (ft msl)	MO (ft msl)	MT (ft msl)	MO (ft msl)
01N21W32Q06S	Saline Intrusion Management Area	Oxnard	-25.8	11/22/1991	2	17	0	-7
01N22W20J08S	Saline Intrusion Management Area	Oxnard	-14.8	9/28/1991	7	17	0	0
01N22W26J04S	Saline Intrusion Management Area	Oxnard	-28.3	10/26/1990	2	17	0	0
01N22W27C03S	Saline Intrusion Management Area	Oxnard	-18.6	12/13/1990	7	17	0	0
01N23W01C05S	West Oxnard Plain Management Area	Oxnard	-6.9	11/18/1991	7	17	0	0
02N22W36E06S	West Oxnard Plain Management Area	Oxnard	-25	10/28/2015	12	37	0	0
01N21W32Q05S	Saline Intrusion Management Area	Mugu	-107.4	11/30/2015	2	17	-7	-12
01N21W32Q07S	Saline Intrusion Management Area	Mugu	-72.5	11/30/2015	2	17	-7	-12
01N22W20J07S	Saline Intrusion Management Area	Mugu	-16.5	11/13/1991	7	17	0	0
~~01N22W26J03S~~[22]	~~Saline Intrusion Management Area~~	~~Mugu~~	~~-52.6~~	~~10/26/1990~~	~~2~~	~~17~~	—	—
01N22W27C02S	Saline Intrusion Management Area	Mugu	-27.3	12/13/1990	7	17	-7	-7
02N21W07L06S	Forebay Management Area	Mugu	-12.2	12/3/2015	27	62	0	13
02N22W23B07S	Forebay Management Area	Mugu	-40.8	12/15/1992	17	47	0	13
02N22W36E05S	West Oxnard Plain Management Area	Mugu	-21	11/4/2015	12	37	0	0
01N22W20J05S	Saline Intrusion Management Area	Hueneme	-29.9	11/30/2015	2	17	0	0
01N23W01C03S	West Oxnard Plain Management Area	Hueneme	-39.7	1/7/1991	7	22	0	0
01N23W01C04S	West Oxnard Plain Management Area	Hueneme	-34.9	1/7/1991	7	22	0	0
02N22W23B04S	Forebay Management Area	Hueneme	-147.1	10/28/2014	-3	17	0	0
02N22W23B05S	Forebay Management Area	Hueneme	-121	10/12/1991	-3	17	0	0
02N22W23B06S	Forebay Management Area	Hueneme	-41.7	2/3/1993	17	47	0	13
02N22W36E03S	West Oxnard Plain Management Area	Hueneme	-51.8	12/3/2014	12	37	0	0
02N22W36E04S	West Oxnard Plain Management Area	Hueneme	-32.11	11/4/2015	12	37	0	0
01N21W32Q04S	Saline Intrusion Management Area	FCA	-116.9	11/30/2015	-23	2	13	0
01N22W20J04S	Saline Intrusion Management Area	FCA	-40.7	11/30/2015	2	17	0	0
01N22W26K03S	Saline Intrusion Management Area	FCA	-71.8	6/16/2015	-18	2	0	0
01N23W01C02S	West Oxnard Plain Management Area	FCA	-50.4	1/7/1991	7	22	0	0
02N21W07L04S	Forebay Management Area	FCA	-32	10/14/2015	17	42	0	13
02N22W23B03S	Forebay Management Area	FCA	-128.7	2/28/1991	-3	17	0	0
01N21W32Q02S	Saline Intrusion Management Area	GCA	-115.2	11/30/2015	-23	2	13	0
01N21W32Q03S	Saline Intrusion Management Area	GCA	-125.8	11/30/2015	-23	2	13	0
01N21W07J02S	Oxnard Pumping Depression Management Area	Multiple	-145.4	10/21/2014	-38	2	13	0
01N21W21H02S	Oxnard Pumping Depression Management Area	Multiple	-149.4	10/20/2014	-68	-8	38	8
02N21W07L03S	Forebay Management Area	Multiple	-24.6	10/15/2015	17	37	-7	13
02N21W07L05S	Forebay Management Area	Multiple	-7.4	12/30/2015	27	57	0	18

Notes: FCA= Fox Canyon Aquifer, GCA = Grimes Canyon Aquifer; MT = minimum threshold; MO = measurable objective; ft. msl = feet mean sea level. Strikethrough indicates well was removed from the key well network.

22 Since 2016, an obstruction in the well head has prevented manual depth to water measurements at well 01N22W26J03S. This well has been removed from the monitoring network.

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6.2 Measurable Objectives

Consistent with the GSP, the measurable objective groundwater elevations were evaluated by comparing the GSP-defined measurable objective groundwater elevations to the median simulated groundwater elevation after 2040 from the NNP3 simulation (Table 6-1). Measurable objectives at eleven (11) key wells differed from the GSP measurable objective by greater than 5 feet (Table 6-1). These wells are located in the Pumping Depression Management Area, the Saline Intrusion Management Area, and the Forebay Management Area. For the same reasons outlined in section 6.2.1 relative to the minimum thresholds, no changes are recommended to the measurable objectives at this time.

6.3 Potential Sustainable Management Criteria with Implementation of EBB

Implementation of UWCD's EBB project will require minimum threshold groundwater elevations in the Saline Intrusion Management Area to be lower than the GSP minimum thresholds to provide sufficient flexibility for project operation. In addition, successful implementation of UWCD's EBB project is anticipated to allow for the lowering of minimum thresholds and measurable objectives throughout the remainder of the Subbasin without causing additional seawater intrusion (Figures 6-7a through 6-12).

6.3.1 Minimum Thresholds

Based on the Future Baseline with EBB simulation results, minimum thresholds in the UAS of the Saline Intrusion Management Area may need to be lowered by approximately 15 to 50 feet in the Oxnard aquifer and 15 to 1000 feet in the Mugu aquifer. In the LAS of the Saline Intrusion Management Area, the minimum threshold groundwater elevations may need to be lowered by between approximately 15 and 60 feet in the Hueneme aquifer, FCA, and GCA (Table 6-2, Minimum Threshold and Measurable Objective Groundwater Elevation Differences for the Oxnard Subbasin with EBB).

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Table 6-2. Minimum Threshold and Measurable Objective Groundwater Elevation Differences for the Oxnard Subbasin with EBB

SWN	Aquifer	Management Area	Historical Low (ft msl) and Date Measured		Minimum Thresholds and Measurable Objectives Defined in the GSP		Difference between the Current Minimum Thresholds and Measurable Objectives and the Potential Minimum Thresholds and Measurable Objectives with the EBB Project	
					MT (ft msl)	MO (ft msl)	MT (ft msl)	MO (ft msl)
01N21W32Q06S	Saline Intrusion Management Area	Oxnard	-25.8	11/22/1991	2	17	-47	-47
01N22W20J08S	Saline Intrusion Management Area	Oxnard	-14.8	9/28/1991	7	17	-17	-12
01N22W26J04S	Saline Intrusion Management Area	Oxnard	-28.3	10/26/1990	2	17	-27	-27
01N22W27C03S	Saline Intrusion Management Area	Oxnard	-18.6	12/13/1990	7	17	-22	-17
01N23W01C05S	West Oxnard Plain Management Area	Oxnard	-6.9	11/18/1991	7	17	-17	-7
02N22W36E06S	West Oxnard Plain Management Area	Oxnard	-25	10/28/2015	12	37	-17	-12
01N21W32Q05S	Saline Intrusion Management Area	Mugu	-107.4	11/30/2015	2	17	-102	-97
01N21W32Q07S	Saline Intrusion Management Area	Mugu	-72.5	11/30/2015	2	17	-102	-97
01N22W20J07S	Saline Intrusion Management Area	Mugu	-16.5	11/13/1991	7	17	-17	-12
~~01N22W26J03S~~[23]	~~Saline Intrusion Management Area~~	~~Mugu~~	~~-52.6~~	~~10/26/1990~~	~~2~~	~~17~~	-	-
01N22W27C02S	Saline Intrusion Management Area	Mugu	-27.3	12/13/1990	7	17	-32	-27
02N21W07L06S	Forebay Management Area	Mugu	-12.2	12/3/2015	27	62	-22	-7
02N22W23B07S	Forebay Management Area	Mugu	-40.8	12/15/1992	17	47	-17	0
02N22W36E05S	West Oxnard Plain Management Area	Mugu	-21	11/4/2015	12	37	-17	-12
01N22W20J05S	Saline Intrusion Management Area	Hueneme	-29.9	11/30/2015	2	17	-22	-22
01N23W01C03S	West Oxnard Plain Management Area	Hueneme	-39.7	1/7/1991	7	22	-17	-17
01N23W01C04S	West Oxnard Plain Management Area	Hueneme	-34.9	1/7/1991	7	22	-17	-17
02N22W23B04S	Forebay Management Area	Hueneme	-147.1	10/28/2014	-3	17	-47	-42
02N22W23B05S	Forebay Management Area	Hueneme	-121	10/12/1991	-3	17	-47	-42
02N22W23B06S	Forebay Management Area	Hueneme	-41.7	2/3/1993	17	47	-17	0
02N22W36E03S	West Oxnard Plain Management Area	Hueneme	-51.8	12/3/2014	12	37	-17	-12
02N22W36E04S	West Oxnard Plain Management Area	Hueneme	-32.11	11/4/2015	12	37	0	0

[23] Since 2016, an obstruction in the well head has prevented manual depth to water measurements at well 01N22W26J03S. This well has been removed from the monitoring network.

Table 6-2. Minimum Threshold and Measurable Objective Groundwater Elevation Differences for the Oxnard Subbasin with EBB

SWN	Aquifer	Management Area	Historical Low (ft msl) and Date Measured		Minimum Thresholds and Measurable Objectives Defined in the GSP		Difference between the Current Minimum Thresholds and Measurable Objectives and the Potential Minimum Thresholds and Measurable Objectives with the EBB Project	
					MT (ft msl)	MO (ft msl)	MT (ft msl)	MO (ft msl)
01N21W32Q04S	Saline Intrusion Management Area	FCA	-116.9	11/30/2015	-23	2	-22	-17
01N22W20J04S	Saline Intrusion Management Area	FCA	-40.7	11/30/2015	2	17	-37	-22
01N22W26K03S	Saline Intrusion Management Area	FCA	-71.8	6/16/2015	-18	2	-47	-37
01N23W01C02S	West Oxnard Plain Management Area	FCA	-50.4	1/7/1991	7	22	-57	-57
02N21W07L04S	Forebay Management Area	FCA	-32	10/14/2015	17	42	-57	-57
02N22W23B03S	Forebay Management Area	FCA	-128.7	2/28/1991	-3	17	-52	-42
01N21W32Q02S	Saline Intrusion Management Area	GCA	-115.2	11/30/2015	-23	2	-42	-42
01N21W32Q03S	Saline Intrusion Management Area	GCA	-125.8	11/30/2015	-23	2	-42	-22
01N21W07J02S	Oxnard Pumping Depression Management Area	Multiple	-145.4	10/21/2014	-38	2	-22	0
01N21W21H02S	Oxnard Pumping Depression Management Area	Multiple	-149.4	10/20/2014	-68	-8	-22	-17
02N21W07L03S	Forebay Management Area	Multiple	-24.6	10/15/2015	17	37	-37	-22
02N21W07L05S	Forebay Management Area	Multiple	-7.4	12/30/2015	27	57	-47	-37

Notes: FCA= Fox Canyon Aquifer, GCA = Grimes Canyon Aquifer; MT = minimum threshold; MO = measurable objective; ft. msl = feet mean sea level. Strikethrough indicates well was removed from the key well network.

In the UAS and LAS of the Forebay Management Areas, the minimum threshold groundwater elevations could be lowered by an average of approximately 20 and 37 feet, respectively. In the LAS of the Oxnard Pumping Depression Management Area, the minimum threshold groundwater elevations could be lowered by an average of approximately 47 feet (Table 6-2).

To provide sufficient flexibility to UWCD and operators in the Subbasin while still mitigating seawater intrusion, the minimum threshold elevations at five key wells may occur below historical low groundwater elevations (Table 6-2). If these SMC are adopted following successful implementation of the EBB project, additional land subsidence monitoring may be warranted to ensure that groundwater elevations below historical lows at these wells do not result in land subsidence that significantly and unreasonably impacts land surface uses and nearby infrastructure.

6.3.2 Measurable Objectives

Based on the Future Baseline with EBB simulation results, measurable objectives in the UAS of the Saline Intrusion Management Area could be lowered by an average of approximately 25 and 60 feet in the Oxnard and Mugu aquifers, respectively. In the LAS of the Saline Intrusion Management Area, the measurable objective groundwater elevations may need to be lowered by an average of approximately 22, 45, and 57 feet in the Hueneme aquifer, FCA, and GCA, respectively (Table 6-2).

In the UAS and LAS of the Forebay Management Area, the measurable objective groundwater elevations could be lowered by an average of approximately 7 and 28 feet, respectively. In the LAS of the Oxnard Pumping Depression Management Area, the minimum threshold groundwater elevations could be lowered by an average of approximately 42 feet (Table 6-2).

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7 Monitoring Network

This section summarizes changes to the monitoring network for the Subbasin, including revisions to the key well network. Groundwater wells that are included in the monitoring network are shown in Figures 7-1, Monitoring Network Wells Screened in the Oxnard Aquifer, through Figure 7-5, Monitoring Network Wells Screened in the Grimes Canyon Aquifer.

7.1 Summary Of Changes to the Monitoring Network

Groundwater data for the Subbasin has been collected from a network of more than 200 wells screened in the UAS and LAS. These wells are monitored regularly for water level and water quality by United Water Conservation District (UWCD) and Ventura County Watershed Protection District. A summary of the changes to the monitoring network for each district are described below.

Changes to UWCD's Monitoring Activities

UWCD monitors the majority of the wells in the network. Since the adoption of the GSP, nine wells have been removed from the UWCD monitoring network (Table 7-1, UWCD Wells Removed from the Network), either due to lack of access or well destruction, and 14 wells have been added to the monitoring network (Table 7-2, UWCD Wells Added to the Network). Of the wells removed from the network, seven were either screened in multiple or unassigned aquifers, one was screened in the Mugu aquifer, and one was screened in the Hueneme aquifer. Two wells had been used to monitor water quality and seven were for water level measurements. The wells added to the monitoring schedule include five wells screened in the Mugu aquifer; two wells screened in each the Oxnard and Fox Canyon aquifers; one well screened in each the Hueneme and Grimes Canyon aquifers, and two wells screened in multiple aquifers within the LAS. All of the wells are scheduled for monthly or bimonthly water level sampling and one well also includes quarterly water quality sampling.

Table 7-1. UWCD Wells Removed from the Network

State Well Number (SWN)	Main Use	Screened Aquifer	Screened Aquifer System	Water Level, Water Quality
02N22W27M02S	Municipal	Unassigned	UAS	WQ
02N21W06P01S	Agricultural	Multiple	Unassigned	WL
02N21W29L04S	Agricultural	Multiple	LAS	WL
02N21W30A01S	Agricultural	Unassigned	LAS	WL
02N22W14P02S	Municipal	Multiple	UAS	WL
02N22W23B02S	Municipal	Multiple	UAS	WL
02N22W27M02S	Municipal	Unassigned	UAS	WQ
02N22W36E04S	Municipal	Hueneme	LAS	WL
02N22W36E05S	Municipal	Mugu	UAS	WL

Table 7-2. UWCD Wells Added to the Network

State Well Number (SWN)	Main Use	Screened Aquifer	Screened Aquifer System	Manual Water Level Monitored Bimonthly or Monthly	Transducer and Manual Water Levels	Water Level Sampling Schedule[a,b]	Water Quality Sampling Schedule[a]
02N22W23H05S	Monitoring	Mugu	UAS	Monthly	Yes	Monthly	Quarterly
01N21W16P05S	Monitoring	Hueneme	LAS	Monthly		Monthly	
01N21W16P06S	Monitoring	Mugu	UAS	Monthly		Monthly	
01N21W16P07S	Monitoring	Oxnard	UAS	Monthly		Monthly	
01N21W16P08S	Monitoring	Grimes	LAS	Monthly		Monthly	
01N21W16P09S	Monitoring	Fox	LAS	Monthly		Monthly	
01N21W16P10S	Monitoring	Fox	LAS	Monthly		Monthly	
01N22W05C03S	Agricultural	Oxnard	UAS	Bi-monthly		Bimonthly	
02N21W30F02S	Agricultural	Multiple	LAS	Monthly		Monthly	
02N22W13B01S	Agricultural	Multiple	LAS	Monthly		Monthly	
02N22W23F07S	Municipal	Mugu	UAS		Yes	Monthly	
02N22W14P04S	Municipal	Mugu	UAS		Yes	Monthly	
02N22W23B10S	Municipal	Mugu	UAS		Yes	Monthly	

Ventura County Watershed Protection District had a total of 18 wells removed from and 6 wells added to the monitoring schedule (Table 7-3, VCWPD Wells Removed from the Network; and Table 7-4, VCWPD Wells Added to the Network). Of the wells removed from the monitoring schedule, 15 were screened in multiple or unassigned aquifers, 1 was screened in the FCA, 1 was screened in the Hueneme aquifer, and 1 was screened in the Oxnard aquifer. Thirteen of the wells removed were sampled for water quality and five were monitored for water levels. The wells added to the monitoring schedule are all scheduled for quarterly water level monitoring. Two wells are screened within the FCA, and one well is screened in each the Hueneme, Mugu, Oxnard, and Grimes Canyon aquifers.

Table 7-3. VCWPD Wells Removed from the Network

State Well Number (SWN)	Main Use	Screened Aquifer	Screened Aquifer System	Water Level, Water Quality
01N21W19J05S	Agricultural	Multiple	LAS	WQ
01N21W20N07S	Domestic	Multiple	UAS	WL
01N21W21H03S	Agricultural	Unassigned	LAS	WQ
01N21W32K01S	Municipal	FCA	LAS	WL
01N22W12N03S	Agricultural	Multiple	LAS	WL
01N22W14K01S	Agricultural	Oxnard	UAS	WL
01N22W19A01S	Municipal	Hueneme	LAS	WQ
01N22W21B03S	Municipal	Multiple	LAS	WL
01N22W25K01S	Agricultural	Unassigned	UAS	WQ
01N22W26Q01S	Agricultural	Unassigned	Both	WQ
02N21W19A01S	Domestic	Multiple	UAS	WQ
02N21W20M03S	Agricultural	Multiple	UAS	WQ
02N22W24R02S	Domestic	Unassigned	UAS	WQ
02N22W25A02S	Agricultural	Unassigned	UAS	WQ
02N22W25F01S	Industrial	Unassigned	UAS	WQ
02N22W27M02S	Municipal	Unassigned	UAS	WQ
02N22W36F01S	Domestic	Unassigned	Unassigned	WQ
02N22W36F02S	Agricultural	Unassigned	UAS	WQ

Table 7-4. VCWPD Wells Added to the Network

State Well Number (SWN)	Main Use	Screened Aquifer	Screened Aquifer System	Manual Water Levels Monitored by VCWPD	Water Quality Samples Collected by VCWPD	Water Level Sampling Schedule	Water Quality Sampling Schedule
01N21W16P05S	Monitoring	Hueneme	LAS	Yes	—	Monthly	—
01N21W16P06S	Monitoring	Mugu	UAS	Yes	—	Monthly	—
01N21W16P07S	Monitoring	Oxnard	UAS	Yes	—	Monthly	—
01N21W16P08S	Monitoring	Grimes	LAS	Yes	—	Monthly	—

Table 7-4. VCWPD Wells Added to the Network

State Well Number (SWN)	Main Use	Screened Aquifer	Screened Aquifer System	Manual Water Levels Monitored by VCWPD	Water Quality Samples Collected by VCWPD	Water Level Sampling Schedule	Water Quality Sampling Schedule
01N21W16P09S	Monitoring	Fox	LAS	Yes	—	Monthly	—
01N21W16P10S	Monitoring	Fox	LAS	Yes	—	Monthly	—

7.2 Data Gaps

7.2.1 Data Gaps That Have Been Partially Addressed

7.2.2 Spatial Data Gaps

FCGMA has undertaken several steps toward filling data gaps identified in the GSP. At the request of FCGMA, DWR installed a nested monitoring well cluster in 2019 near Revolon Slough, within the Oxnard Pumping Depression Management Area, through its Technical Support Services program. In addition, FCGMA is constructing two additional nested monitoring well clusters in the Subbasin partially funded through DWR's Sustainable Groundwater Management Implementation Grant: one located near the boundary with the WLPMA, and one located in the EOPMA. Data collected through these wells will help characterize groundwater conditions in areas identified as data gaps in the GSP. The construction of these three monitoring well clusters addresses three spatial data gaps identified in the GSP.

7.2.3 Subsidence Monitoring

The GSP recommended incorporating land subsidence monitoring as data becomes available. Since adoption of the GSP, DWR has begun publishing remotely sensed Interferometric Synthetic Aperture Radar (InSAR) data to measure land subsidence. FCGMA has incorporated these data into the GSP monitoring and reporting process. This data is used to directly monitor land surface deformations, although it is noted that the minimum threshold groundwater elevations are higher than the historical low groundwater elevations and should, therefore, protect against land subsidence as a result of groundwater production.

7.2.4 Shallow Groundwater Monitoring near Surface Water Bodies and GDEs

The GSP identified data gaps in the network of wells that monitoring shallow groundwater monitoring near surface water bodies and GDEs. FCGMA is currently constructing shallow groundwater monitoring wells in three locations in the Subbasin: one along Revolon Slough, one along the lower portion of Santa Clara River, and one near Calleguas Creek. Data collected via these wells will help to characterize the degree of interaction between surface water, groundwater conditions in the perched aquifer, and groundwater conditions in the underlying principal aquifers. These new wells are partially funded through DWR's Sustainable Groundwater Management Implementation Grant.

7.2.5 Remaining Data Gaps

As described in the GSP, the existing monitoring network in the Subbasin is sufficient to document groundwater and can be used to document progress towards sustainability. Potential monitoring network improvements that address data gaps that remain from the GSP are summarized below.

7.2.5.1 Water Level Measurements: Spatial Data Gaps

The GSP identified data gaps in the spatial and vertical distribution of groundwater elevation measurements in the Subbasin and recommended construction of:

- A monitoring well or wells near the boundary between the Subbasin and the WLPMA.
- A monitoring well or wells within the East Oxnard Plain Management Area.
- A monitoring well or wells within the Oxnard Pumping Depression Management Area.
- A monitoring well or wells within the West Oxnard Plain Management Area.

As described in Section 7.2.1, Data Gaps That Have Been Partially Addressed, the newly constructed monitoring wells in the Subbasin, help to address data gaps near the boundary between the Subbasin and WLPMA, and within the Oxnard Pumping Depression Management Area. Opportunities to construct a monitoring well, or wells, within the West Oxnard Plain Management Area will be evaluated as part of FCGMA's formal project evaluation and prioritization process.

Since 2016, an obstruction in the well head has prevented manual depth to water measurements at well 01N22W26J03S, a key well screened in the Oxnard aquifer within the Saline Intrusion Management Area. Because of this, this well has been removed from the key well network. FCGMA anticipates that additional depth-discrete groundwater monitoring wells will be constructed in the Saline Intrusion Management Area over the next five years as part of implementing Phase I of UWCD's EBB project. FCGMA will evaluate the appropriateness of incorporating these wells into the key well network as data are collected.

7.2.5.2 Water Level Measurements: Temporal Data Gap

The DWR Monitoring Protocols Best Management Practices (DWR 2016a) states the following:

> Groundwater elevation data … should approximate conditions at a discrete period in time. Therefore, all groundwater levels in a basin should be collected within as short a time as possible, preferably within a 1-to-2-week period.

The DWR Monitoring Networks Best Management Practices (DWR 2016b) states the following:

> Groundwater levels will be collected during the middle of October and March for comparative reporting purposes.

Currently, groundwater elevation measurements are not scheduled according to these criteria because FCGMA relies on monitoring by several other agencies.

This temporal data gap has affected the consistency of seasonal low and high measurements at three key wells in the Subbasin: 02N22W36E03S, 02N22W36E04S, and 02N22W36E05S. FCGMA anticipates coordinating with the lead monitoring agency to identify opportunities to collect groundwater elevation measurements at these wells within the recommended October and March measurement windows.

To minimize the effects of this type of temporal data gap in the future, it will be necessary to coordinate the collection of groundwater elevation data to occur within a 2-week window during the key reporting periods of mid-March and mid-October. The recommended collection windows are October 9–22 in the fall and March 9–22 in the spring. Additionally, as funding becomes available, pressure transducers should be added to wells in the groundwater monitoring network. Pressure transducer records provide the high-temporal-resolution data that allows for a better understanding of water level dynamics in the wells related to groundwater production, groundwater management activities, and climatic influence. Installing pressure transducers in agricultural irrigation wells requires installation of sounding tubes to below the turbine pump bowls and modification of the wellhead.

7.3 Functionality of the Water Level Monitoring Network

While data gaps remain in the Subbasin, the spatial and temporal coverage of the existing groundwater monitoring network is sufficient to provide an understanding of representative water level conditions in the UAS and LAS throughout the Subbasin (Figures 7-1 to 7-5). FCGMA anticipates evaluating opportunities to fill these data gaps over the next five years as part of GSP implementation.

Actions that would improve the spatial and temporal resolution of aquifer specific groundwater elevations are discussed in the GSP (FCGMA 2019). The new monitoring well cluster in the Oxnard Pumping Depression Area improved spatial resolution across all aquifers. However, only one well in the area is screened within the GCA. Additional wells would help constrain groundwater gradients between the Subbasin and PVB. Additional monitoring well locations within the West Oxnard Plain Management Area would help constrain groundwater gradients in the northwest part of the Subbasin. Currently, groundwater elevations are not scheduled according to the recommended collection windows of October 9 to 22 in the fall and March 9 to 22 in the spring, based on DWR Monitoring Networks Best Management Practices (DWR 2016). This temporal resolution could be improved further with additional wells equipped with transducers as funding becomes available.

7.4 Functionality of Additional Monitoring Network

DWR provides TRE ALTAMIRA InSAR Subsidence Data that characterizes land surface deformations across the Subbasin. Updates are provided annually with point data and raster interpolations of total vertical displacement since June 13, 2015, and annual vertical displacement rates. This data will be used in conjunction with groundwater elevation data to monitor land subsidence with relation to groundwater extraction.

Table 7-5. Revisions to the Key Well Network

State Well Number	Management Area	Aquifer	GSP Undesirable Result	Issue	Identified alternative	Resolution
01N22W26J03S	Saline Water Intrusion	Mugu	SWI, reduction in	Obstructed access to the well has not allowed for	01N22W35E04S	Monitoring well (closer to the coast) is measured for

Table 7-5. Revisions to the Key Well Network

State Well Number	Management Area	Aquifer	GSP Undesirable Result	Issue	Identified alternative	Resolution
	Management Area		groundwater storage	measurements since 2016. Needs repair or replacement with another well.		WL and WQ by UWCD.

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8 FCGMA Authorities and Enforcement Actions

8.1 Actions Taken by the Agency

This section describes relevant actions taken by FCGMA and includes a summary of regulations or ordinances related to the GSP, per GSP Emergency Regulations Section 356.4(g). As a groundwater management agency established by the California Legislature in 1982 with the Fox Canyon Groundwater Management Agency Act, FCGMA had adopted many ordinances and regulations related to managing the Basin prior to adoption of the GSP in December 2019.

Table 8-1. Summary of Actions Taken by the Agency

Date Adopted	Regulatory Action	Description
4/22/2020	Resolution No. 2020-03 Establishing Policies and Procedures for Granting Variances from the Initial Extraction Allocation Under the Ordinance to Establish an Allocation System for the Oxnard and Pleasant Valley Groundwater Basins	Facilitated implementation of new extraction allocation system by establishing policies and procedures for granting variances to initial allocations.
5/27/2020	An Ordinance to Adjust Extraction Allocations to Facilitate the Transition from Calendar Year to Water Year Reporting of Groundwater Extractions	Established the process to transition from Agency's traditional calendar year extraction reporting to reporting by water year.
7/22/2020	An Ordinance to Amend the Ordinance Extending the Phase 2 Water Market Pilot Program	Extended FCGMA's Water Market Pilot Program through October 31, 2021.
10/28/2020	An Ordinance to Amend the Ordinance to Establish an Allocation System for the OPV Groundwater Basins to Reduce the Potential for Imposition of Surcharges	Eased transition to new allocation ordinance for pumpers with reduced extraction allocations under new ordinance.
10/28/2020	Resolution No. 2020-05 Imposing a Fee on Groundwater Extractions to Establish a Reserve Fund to be Used to Pay the Cost and Expenses of Actions and Proceedings Related to FCGMA's Groundwater Sustainability Program	Imposed a new $20 per AF fee on all but de minimis pumpers for legal expenses related to actions and proceedings related to FCGMA's GSP implementation.
10/2/2020	Resolution No. 2020-07 Increasing Tiered Groundwater Extraction Surcharge Rates.	Increased the surcharge rate to $1,549 for extractions that exceed a pumper's extraction allocation.
3/24/2021	Ordinance to Amend the Ordinance to Establish an Allocation System for the Oxnard and Pleasant Valley Groundwater Basins	Modified reporting requirements for mutual water companies, special districts, and municipalities for groundwater or in lieu deliveries for agricultural use outside of the Basin or Agency boundary.
3/24/2021	An Ordinance to Exempt Domestic Operators from the Requirement that Flowmeters be Equipped with Advanced Metering Infrastructure (AMI) Telemetry	Exempts domestic pumpers that extract 2 AF or less per year with specified maximum pump discharge and horsepower from Agency's AMI requirements.

Table 8-1. Summary of Actions Taken by the Agency

Date Adopted	Regulatory Action	Description
2/23/2022	Amended Resolution No. 2020-03 establishing policies and procedures for granting variances from the initial extraction allocation under the ordinance to establish an allocation for the Oxnard and Pleasant Valley Groundwater Basins	Facilitated implementation of extraction allocation system by delegating consideration of certain civil penalties to the Executive Officer and clarified text to avoid potential confusion.
5/25/2022	Ordinance 8.10 to Amend the Fox Canyon Groundwater Management Agency Ordinance Code Relating to Reporting Extractions	Requires monthly extraction reporting by M&I and domestic pumpers, in addition to agricultural pumpers, for wells required to be equipped with AMI.
9/28/2022	Resolution No. 2022-05 Increasing Fee on Groundwater Extractions to Fund the Costs of a Groundwater Sustainability Program.	Increased the groundwater sustainability fee to $29 per AF (except de minimis pumpers) to fund the costs of the groundwater sustainability program.
10/26/2022	Resolution No. 2022-06 Increasing the Tiered Groundwater Extraction Surcharge Rates.	Increased the surcharge rate to $1,841 for extractions that exceed a pumper's allocation.
10/25/2023	Resolution No. 2023-02 Regarding the Accrual, Extraction, and Transfer of Recycled Water Pumping Allocation [Supersedes Resolution 2013-02]	Establishes modified in-lieu program to facilitate City of Oxnard's delivery of recycled water to agricultural pumpers.
3/27/2024	An Ordinance Amending Articles 4 and 6 and Rescinding Section 10.2 of an Ordinance to Establish an Allocation System for the Oxnard and Pleasant Valley Groundwater Basins	Amends the allocation ordinance to comply with a court decision and order; establishes a new Calleguas Flex Program to encourage coordinated use of groundwater and imported water supplies.
4/24/2024	Resolution No. 2024-03 Increasing Tiered Groundwater Extraction Surcharge Rates	Increased the surcharge rate to $1,929 for extractions that exceed a pumper's allocation.

8.1.1 Extraction Reporting

FCGMA implemented several ordinances to improve extraction reporting. These include transition from FCGMA's traditional calendar year reporting to reporting by water year; modified reporting requirements for mutual water companies, special districts, and municipalities for groundwater or in lieu deliveries for agricultural use outside of the Basin; exempting de minimis domestic pumpers from FCGMA's AMI requirements; and requiring monthly extraction reporting by all pumpers required to equip wells with AMI.

8.1.2 Extraction Allocations

Regulating extraction allocations is the primary management action available to FCGMA for managing groundwater demand in the Basin. FCGMA's previous allocation system needed to be replaced to sustainably manage the Basin and a new allocation system was developed over several years concurrent with development of the GSP. The new allocation ordinance was adopted in October 2019 and became effective on October 1, 2020. Since adoption of the GSP, FCGMA has adopted ordinance amendments and resolutions to facilitate transition to the new ordinance, provide policies and procedures for seeking variances, and made modifications required under a court order addressing a challenge to the ordinance. Additionally, FCGMA adopted resolutions increasing tiered groundwater surcharge rates for extractions that exceed allocation. The surcharge provides an economic disincentive to extract groundwater exceeding allocation.

8.1.3 Additional Management Actions

Management actions taken by FCGMA since GSP adoption in addition to extraction allocations include an in-lieu use of recycled water for agricultural irrigation program and extension of a pilot water market. The in-lieu program provides a “recycled water pumping allocation” to the City of Oxnard for delivery of recycled water from its Advanced Water Purification Facility to agricultural operators in the Saline Intrusion and Pumping Depression Management Areas for irrigation in lieu of pumping groundwater. Under the program, the City of Oxnard can extract its recycled water pumping allocation from less impacted areas of the Basin. FCGMA’s Water Market Pilot Program was in effect through the end of Water Year 2021 and allowed purchase of annual allocation for use in the current water year.

8.1.4 Funding

FCGMA adopted a “groundwater sustainability” regulatory fee on extractions to fund development of the GSP. Subsequent to adoption of the GSP, the fee was increased from $14 per acre-foot to $29 per acre-foot to fund the cost of FCGMA’s groundwater sustainability program. FCGMA also adopted a $20 per acre-foot “reserve fee” to fund the cost and expense of legal actions and proceedings brought against FCGMA related to implementation of FCGMA’s groundwater sustainability program. Surcharges collected for extractions exceeding allocation are accounted separate from the operating account and are to be used for acquisition of supplemental water or actions to increase the yield of the Basin. FCGMA has also been investigating establishment of a “groundwater replenishment” fee to fund groundwater supply and replenishment projects and programs.

8.2 Enforcement and Legal Actions by the Agency

FCGMA has a robust ordinance code and set of resolutions that establish programs for basin management and reporting. These include ordinances and resolutions adopted under both the authority of the FCGMA Act and SGMA. The FCGMA Board has adopted policies and procedures for ordinance code violations, including sending notices of violation and assessing civil penalties, for failure to:

- Register an extraction facility.
- Report a change in owner or operator of an extraction facility within 30 days.
- Submit a semi-annual groundwater extraction statement.
- Install and maintain AMI on an extraction facility, unless exempt.
- Submit monthly reports of extractions from AMI, unless exempt.
- Install a flowmeter prior to pumping groundwater from an extraction facility.
- Report flowmeter failure and repair or replace the flowmeter within the required timeframe.
- Test and calibrate a flowmeter at the required frequency.
- Remit payment of groundwater extraction fees or civil penalties

The FCGMA Board additionally established a tiered surcharge for extractions in excess of extraction allocation.

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9 Outreach, Engagement, and Coordination

9.1 Outreach And Engagement

A public outreach and engagement plan was developed for the Oxnard Subbasin GSP (FCGMA 2019). The outreach and engagement plan:

- Discusses FCGMA's decision-making process and how public input and responses will be used.
- Identifies opportunities for public engagement.
- Describes how FCGMA encourages the active involvement of diverse social, cultural, and economic elements of the population in the PVB; and
- Describes the method FCGMA shall follow to inform the public about progress implementing the plan, including the status of projects and management actions.

Since adopting the GSP for the Subbasin in 2019, the FCGMA Board of Directors has continued to prioritize outreach and engagement with interested parties and has followed the elements of the outreach and engagement plan developed for the GSP. Review of the outreach and engagement plan for this First Periodic Evaluation indicates that the methods described for outreach and engagement activities are relevant to GSP implementation and are being used successfully to support interested party involvement in the GSP implementation process.

During the GSP development and adoption process, interested parties expressed an interest in developing additional projects to increase the sustainable yield of the Subbasin. FCGMA engaged with interested parties to solicit project descriptions, which were included in the 2022 GSP annual report (FCGMA 2022). In order to assist the FCGMA Board with evaluating the projects, FCGMA collaborated with interested parties to develop a project evaluation criteria checklist and held multiple operations committee meetings at which the project evaluation process was discussed, and project descriptions were refined. This process will allow FCGMA and project proponents to pursue project funding opportunities and has helped the implementation of project and management actions.

FCGMA has provided updates on GSP implementation activities and public participation opportunities to interested parties through direct electronic communications and posts to the FCGMA website. Additional, updates and opportunities for public comment were provided at FCGMA Regular Board meetings, FCGMA Special Board meetings, and FCGMA Board committee meetings. Meeting agendas and minutes, as well as video recordings of all FCGMA Board meetings and workshops, were made available on the FCGMA website.

FCGMA encouraged active participation from interested parties through public workshops (August 30, 2023; April 25, 2024; and September 9, 2024). Additionally, in response to requests from interested parties, the FCGMA Board held a technical workshop focused on baseline and future model scenarios for both the Subbasin and the PVB on May 30, 2024. This workshop provided interested parties with an opportunity to review the numerical model updates and future model scenarios during the development of this periodic evaluation. Comments made during the technical workshop were used to refine the model scenarios proposed and to develop an additional modeling scenario to evaluate impacts of a geographic redistribution groundwater production on seawater intrusion in the Subbasin. The results of the refined model scenarios are presented in Section 5 Updated Numerical Modeling.

The Draft Periodic Evaluation of the GSP was made available for review on the FCGMA website for 45 days. FCGMA received six comment letters on the Draft Periodic Evaluation. Comment themes focused on the numerical modeling, projects and management actions, and the sustainable management criteria. The Draft Periodic Evaluation was revised in response to the comment letters, which are provided in Appendix A, along with the detailed responses to comments. Several of the comments made suggestions for additional work that needs to be done over the upcoming evaluation period. FCGMA has compiled the list of these suggestions and is working to develop a process to evaluate, prioritize, and accomplish the work that remains to be done to guide the Subbasin to sustainability by 2040.

9.2 GSA Board

The FCGMA Board of Directors holds monthly meetings during which the Board is apprised of ongoing projects and upcoming initiatives that impact groundwater conditions in the basins under its jurisdiction, including the LPVB. Interested parties are informed in advance of each Board meeting via email and the Board meeting schedule is posted on the FCGMA website. Technical updates, consideration of impacts to beneficial uses and users of groundwater, and feedback from interested parties serve as the underpinnings for policy decisions made by the Board.

Since adopting the GSP in 2019, the Board has held 52 regular meetings and 25 special meetings. The topics discussed at these meetings included:

- GSP Implementation
- Grant Opportunities for Projects and Management Actions
- GSP Annual Reports
- GSP Periodic Updates
- Groundwater Allocation Ordinances
- Groundwater Adjudication Proceedings

The Board is composed of members representing the County of Ventura, the United Water Conservation District, the seven small water districts within the FCGMA jurisdiction, the five incorporated cities within the FCGMA jurisdiction, and the farmers. Members of the current Board have served for multiple years and are fully informed of the requirements for sustainable management of the PVB under SGMA.

9.3 Summary of Coordination between Agencies

FCGMA has a long-standing history of coordination with other agencies in the Subbasin, including the Camrosa Water District – Oxnard GSA, the Oxnard Outlying Areas GSA (County of Ventura), and United Water Conservation District. FCGMA also coordinates with the Federal and state agencies that oversee the Channel Islands Air National Guard Station, Naval Base Ventura County, and state beaches within the Subbasin. There are no federally recognized tribal communities within the Oxnard Subbasin. Coordination between relevant agencies in the Subbasin has continued throughout the implementation of the GSP, with FCGMA holding regular meetings to develop projects, pursue grant funding opportunities, and organize collaborative strategies for land use planning, well permitting, and water management within the Subbasin. Because of the history of coordination between agencies that began before SGMA was enacted, no new inter-agency agreements have been required to manage the Subbasin since the GSP was adopted. Similarly, no changes were made to the GSP in response to new local requirements by these agencies.

The Subbasin shares a boundary with both the PVB and LPVB to the east. FCGMA is the primary GSA, along with Camrosa Water District and the County of Ventura, for these adjacent basins. The GSPs for the Subbasin, PVB, and LPVB were all prepared by FCGMA using consistent data, methods, and tools, and the sustainable management criteria for each basin were developed with the consideration of impacts on the adjacent basins. The internal coordination that has been in place since the formation of FCGMA in 1982 has continued through the first 5 years of GSP implementation. The FCGMA Board considers the impacts of implementation activities and policy decisions on the interested parties in all of the basins within the FCGMA jurisdiction.

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10 Other Information

10.1 Consideration of Adjacent Basins

The Subbasin is hydrogeologically connected, to varying degrees, with the PVB, WLPMA, Mound Subbasin, and Santa Paula Subbasin.

FCGMA, as the lead GSA for the Subbasin, PVB, and LPVB, used a regional approach to determine the combined sustainable yield of all three basins during development of the GSP. The individual sustainable yields and sustainable management criteria for each basin were then established to ensure that each basin is managed with mutually beneficial sustainability goals. DWR found that FCGMA's approach demonstrated an adequate consideration of adjacent basins (DWR 2021). FCGMA has not altered this approach as a result of the first periodic evaluation process because implementation of the GSP has not affected the ability of the PVB or LPVB to achieve their respective sustainability goals. FCGMA will continue to manage the Subbasin with consideration of impacts to the adjacent basins and, as part of GSP implementation, will continue to evaluate the relationship between groundwater production in the PVB and groundwater conditions in adjacent basins.

FCGMA will continue to manage the Subbasin with consideration of impacts to the adjacent basins and, as part of GSP implementation, will continue to evaluate the relationship between groundwater production in the Subbasin and groundwater conditions in adjacent basins.

10.2 Challenges Not Previously Discussed

The most significant challenge for successful implementation of the GSP is acquiring funding to fill data gaps, address DWR recommended corrective actions, and construct projects. After adopting the GSP, FCGMA allocated budget and staff resources to work with external consultants to investigate funding mechanisms to support these efforts, and FCGMA and has implemented a reserve fee to respond to legal challenges. However, development and implementation of replenishment fees sufficient to fund full GSP implementation remains a challenge for the agency. FCGMA is currently evaluating Proposition 218 requirements, as required under SGMA, as they relate to a potential replenishment fee.

Additionally, legal challenges have required the focus of significant staff resources that would have been otherwise allocated to pursuing funding to conduct feasibility studies, develop projects, fill data gaps, and address DWR's recommended corrective actions. The upcoming adjudication of the Subbasin has the potential to require additional time and resources that may pose an additional challenge for FCGMA over the next five years.

10.3 Legal Challenges

Fox Canyon Groundwater Management Agency (FCGMA) did not take legal action or enforcement in the Subbasin or the PVB in furtherance of their sustainability goals (23 C.C.R. § 356.4(h).) The following discussion describes the lawsuits pending against FCGMA and their effect on FCGMA's implementation of the OPV GSPs and sustainable management of the Subbasin and the PVB.

City of Oxnard v. Fox Canyon Groundwater Management Agency, Los Angeles Sup. Ct. Case No. 20STCP00929

In December 2019, the City of Oxnard (City) filed a petition for writ of mandate challenging FCGMA's adoption of an ordinance intended to transition FCGMA's current groundwater management programs to sustainable groundwater management under SGMA. The ordinance establishes extraction allocations (limits) for all users in the Subbasin and PVB and recognizes the need to reduce allocations in the event the sustainable yield of these basins is less than the total extraction allocations established under the ordinance. In August 2023, the Los Angeles Superior Court issued a writ of mandate requiring FCGMA to amend the ordinance; FCGMA amended the ordinance in March 2024; the City challenged FCGMA's adoption of the amended ordinance in April 2024; and a hearing on FCGMA's amended ordinance is scheduled for August 2024. If the amended ordinance is invalidated, FCGMA will be required to rescind or revise the ordinance including provisions governing extraction allocations. If required to further amend the ordinance, it is unclear at this time whether FCGMA will rescind or further amend the ordinance and what amendments will be adopted. Consequently, the legal effect of the City's lawsuit on FCGMA's implementation of the OPV GSPs and the sustainable management of the Subbasin and PVB is uncertain at this time.

OPV Coalition, et al. v. Fox Canyon Groundwater Management Agency, Santa Barbara Sup. Ct. Case No. VENCI00555357

In June 2021, the OPV Coalition filed a lawsuit against FCGMA, challenging the OPV GSPs, the ordinance that establishes extraction allocations (limits) for all users in the Subbasin and PVB, and requesting an adjudication of all groundwater rights in the Subbasin and PVB. In May 2024, the Court stayed the claims challenging the OPV GSPs and the ordinance establishing allocations in favor of the groundwater adjudication. In June 2024, the Court issued an order dividing the adjudication into three phases with Phase 1 deciding the safe yield and total safe yield; Phase 2 adjudicating all groundwater rights; and Phase 3 dedicated to deciding the challenges to the OPV GSPs and the allocation ordinance, basin governance and management, and whether a physical solution is necessary. At this time, it is unclear what legal effect the lawsuit, in particular the adjudication action, will have on FCGMA's continued ability to implement the OPV GSPs and sustainably manage the Subbasin and PVB. If the Court had given priority to the writ claims challenging the OPV GSPs and the allocation ordinance (rather than the adjudication), review of the OPV GSPs (including their sustainable yield estimates) and the allocation ordinance would be limited to the administrative records and discovery on the GSPs and ordinance would likely be avoided. Because the Court decided to prioritize the adjudication, plaintiffs intend to take discovery on the OPV GSPs and ordinance during the adjudication, which will necessarily divert FCGMA resources from implementation of the OPV GSPs and sustainably managing the Subbasin and PVB.

11 Summary of Proposed or Completed Revisions to Plan Elements

This first Periodic Evaluation marks an important milestone in FCGMA's continued progress toward meeting the sustainability goal of the Subbasin by 2040. The work completed as part of this periodic GSP evaluation has resulted in:

- An expanded suite of projects considered as part of GSP implementation.
- Improvements to the hydrogeologic conceptual model of the Subbasin based on newly available data.
- Improvements to the estimate of the sustainable yield of Subbasin that accounts for a range of projects and management actions implemented in the Subbasin.
- Revisions to the monitoring network, including the key well network, used to evaluate groundwater conditions and groundwater sustainability in the Subbasin.

None of the revisions and improvements made as a result of this Periodic Evaluation warrant amending the GSP for the Subbasin.

The key take-away from this first Periodic Evaluation is the additional insight gained into potential pathways to sustainability in the Subbasin. These insights were gained from the analysis of the numerical groundwater modeling that incorporated potential projects and management actions that were not contemplated in the GSP. The expanded suite of projects solicited by FCGMA and advanced by interested parties, have provided FCGMA and interested parties with the potential for expanded operational flexibility and new pathways to reach the sustainability goal of the Subbasin. FCGMA and interested parties also identified additional work to be done between 2025 and 2030 to further improve the understanding and management of the Subbasin before the second Periodic Evaluation. The suggestions provided by interested parties and technical experts will be incorporated into a document that can be used to guide funding decisions during FCGMA's annual budget process. Through an integrated planning and budgeting process that facilitates GSP implementation, FCGMA will continue to advance sustainable management of the Subbasin over the upcoming years, in order to reach sustainable management by 2040.

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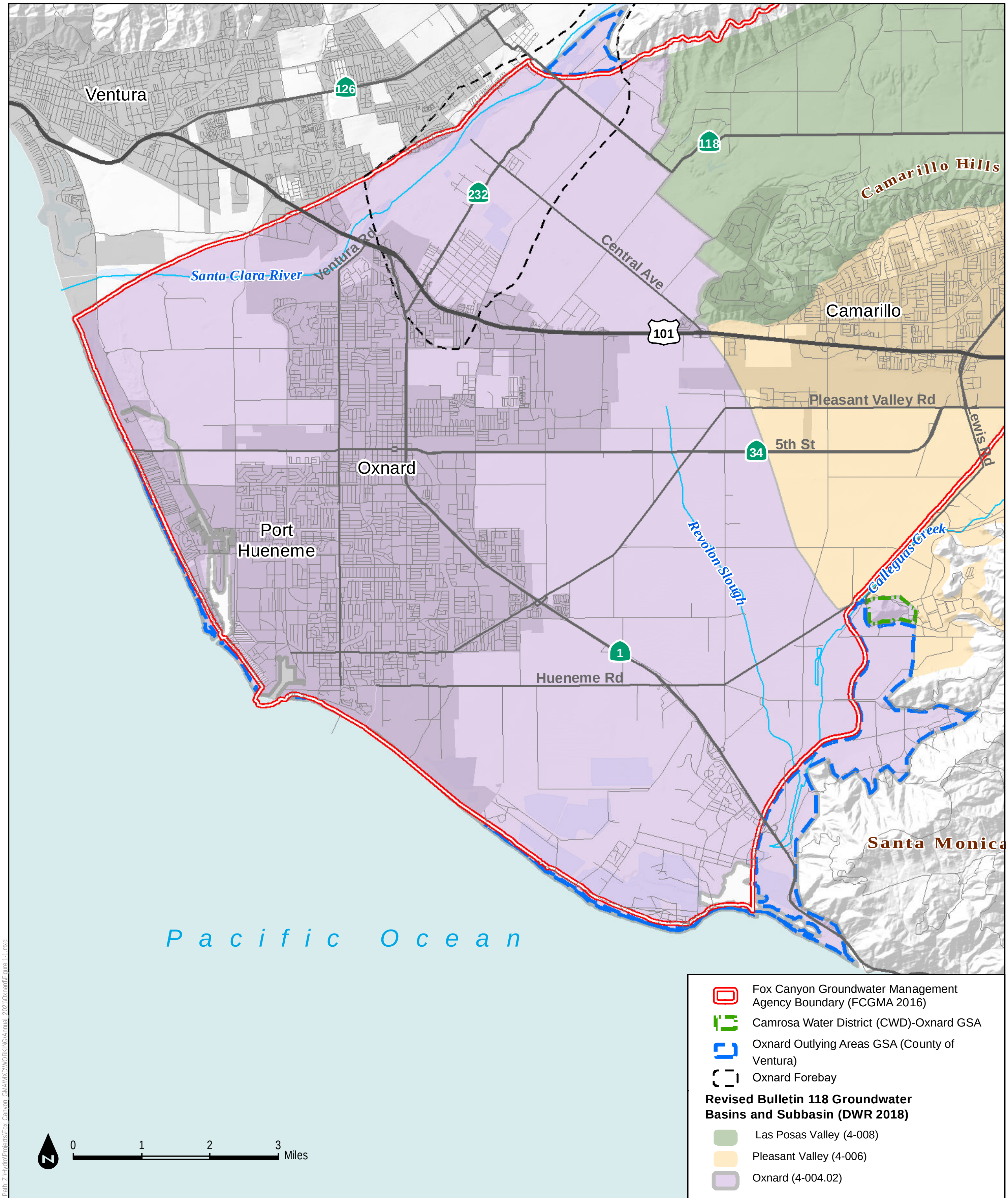

DUDEK

SOURCE: DWR; Santa Barbara County; FCGMA

FIGURE 2-1

Vicinity Map for the Oxnard Subbasin

Groundwater Sustainability Plan for the Oxnard Subbasin: First Periodic Evaluation

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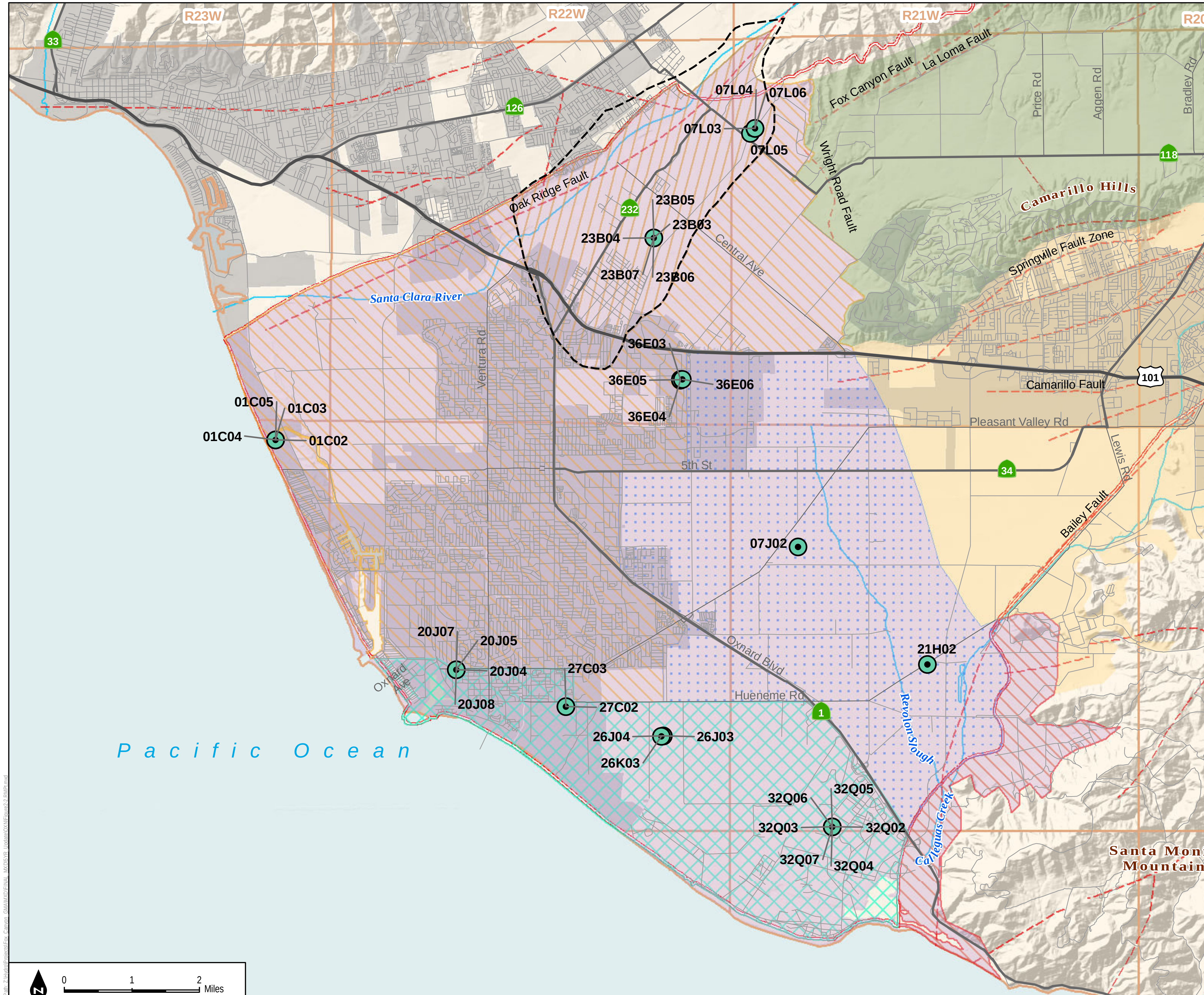

Abbreviated SWN	Aquifer Screened
32Q06	Oxnard
20J08	Oxnard
26J04	Oxnard
27C03	Oxnard
01C05	Oxnard
36E06	Oxnard
32Q05	Mugu
32Q07	Mugu
20J07	Mugu
26J03	Mugu
27C02	Mugu
07L06	Mugu
23B07	Mugu
36E05	Mugu
20J05	Hueneme
01C03	Hueneme
01C04	Hueneme
23B04	Hueneme
23B05	Hueneme
23B06	Hueneme
36E03	Hueneme
36E04	Hueneme
32Q04	Fox
20J04	Fox
26K03	Fox
01C02	Fox
07L04	Fox
23B03	Fox
32Q02	Grimes
32Q03	Grimes
07J02	Multiple
21H02	Multiple
07L03	Multiple
07L05	Multiple

Legend

- Representative Monitoring Points
- **15P01** Abbreviated State Well Number (see notes)
- East Oxnard Plain Management Area (EOPMA)
- Forebay Management Area
- West Oxnard Plain Management Area (WOPMA)
- Oxnard Pumping Depression Management Area
- Saline Intrusion Management
- Fox Canyon Groundwater Management Agency Boundary
- Faults
- Township (North-South) and Range (East-West)

Bulletin 118 Groundwater Basins and Subbasin (DWR 2018)

- Arroyo Santa Rosa Valley (4-007)
- Las Posas Valley (4-008)
- Pleasant Valley (4-006)
- Oxnard (4-004.02)

Notes:
1) Well labels consist of an abbreviated State Well Number (SWN). SWNs are based on Township and Range in the Public Land Survey System. To construct a full SWN from the abbreviation shown on the map, concatenate the Township, Range, abbreviation, and the letter "S". Example: the SWN for the well labeled "29B02" located in Township 02N (T02N) and Range 20W (R20W) is 02N20W29B02S.
2) Aquifer designation information for individual wells was provided by FCGMA, CMWD and UWCD.

SOURCE: DWR; Ventura County; UWCD; CMWD

DUDEK

FIGURE 2-2
Representative Monitoring Points in the Oxnard Subbasin

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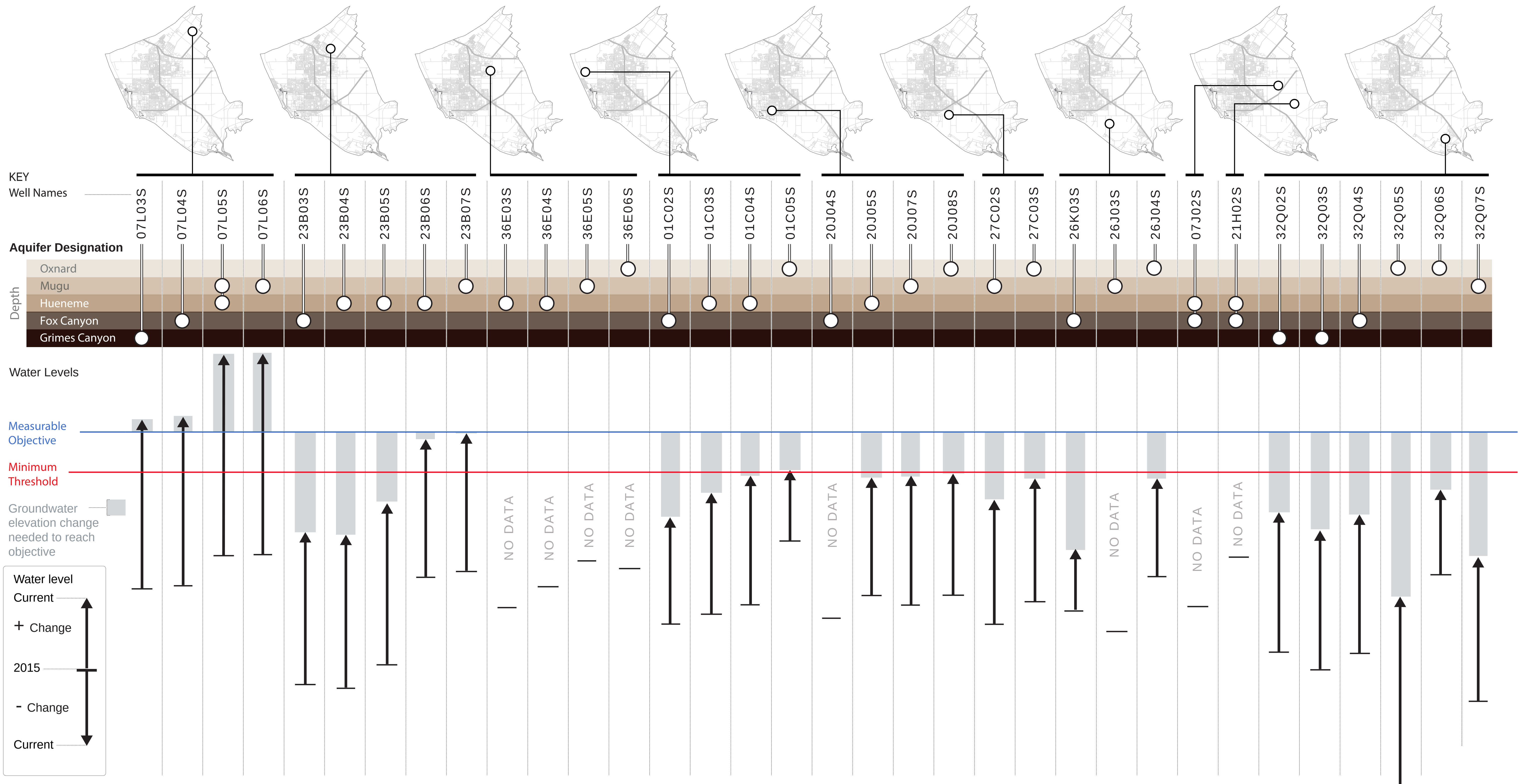

Groundwater elevation change needed to reach objective is scaled to the difference in water level between the measurable objective and minimum threshold water level at each well.

SOURCE:

FIGURE 2-3

Fall 2023 Groundwater Levels Relative to the Minimum Thresholds and Measurable Objectives

Groundwater Sustainability Plan for the Oxnard Subbasin: First Periodic Evaluation

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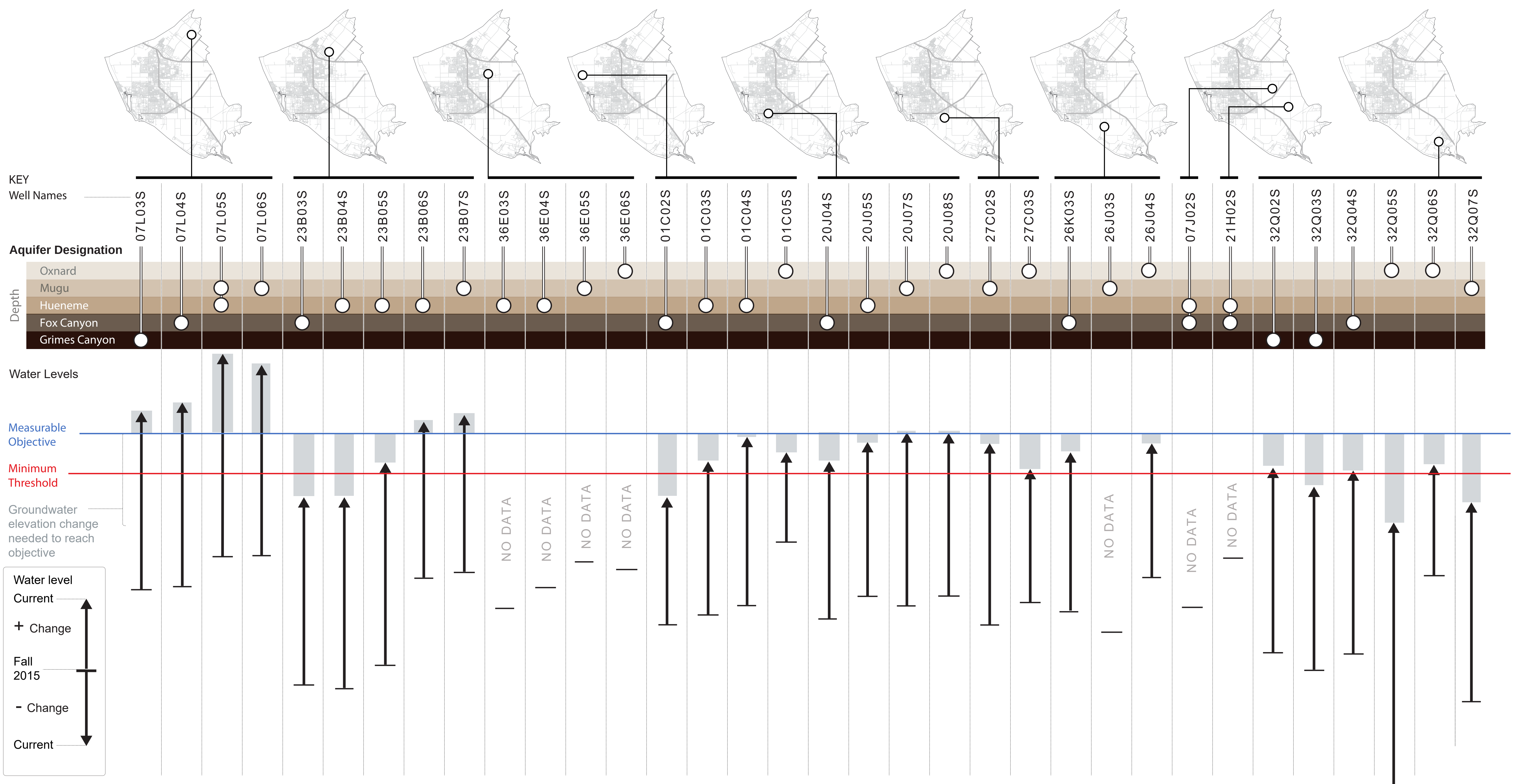

Groundwater elevation change needed to reach objective is scaled to the difference in water level between the measurable objective and minimum threshold water level at each well.

SOURCE:

FIGURE 2-4

Spring 2024 Groundwater Levels Relative to the Minimum Thresholds and Measurable Objectives

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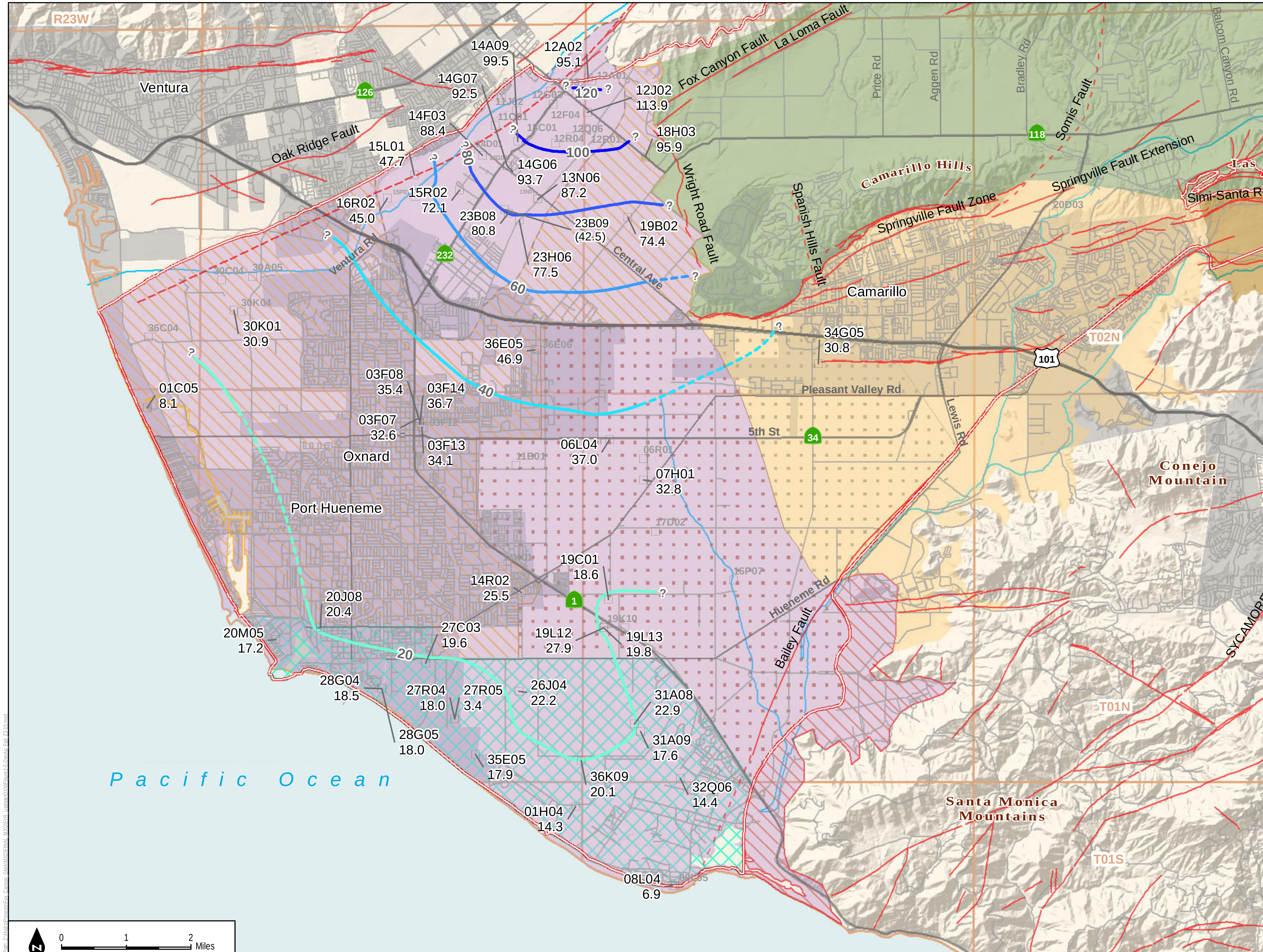

Legend

Contour of equal groundwater elevation change (feet) since 2015. Dashed where approximate; queried where inferred. See Note 3.

Wells screened in the Oxnard Aquifer

15P01 Abbreviated State Well Number (see notes)

+14.7 Difference in Fall 2023 to Fall 2015 Groundwater Elevations

Fox Canyon Groundwater Management Agency Boundary

Faults (Dashed Where Inferred)

Forebay Management Area

East Oxnard Plain Management Area (EOPMA)

West Oxnard Plain Management Area (WOPMA)

Oxnard Pumping Depression Management Area

Saline Intrusion Management

Pleasant Valley Pumping Depression Management Area

Township (North-South) and Range (East-West)

Bulletin 118 Groundwater Basins and Subbasin (DWR 2018)

Arroyo Santa Rosa Valley (4-007)

Las Posas Valley (4-008)

Pleasant Valley (4-006)

Oxnard (4-004.02)

Notes:

1) Well labels consist of an abbreviated State Well Number (SWN) and a groundwater elevation change since 2015 beneath it. SWNs are based on Township and Range in the Public Land Survey System. To construct a full SWN from the abbreviation shown on the map, concatenate the Township, Range, abbreviation, and the letter "S". Example: the SWN for the well labeled "29B02" located in Township 02N (T02N) and Range 20W (R20W) is 02N20W29B02S.

2) Gray SWN abbreviation with no water level difference is missing groundwater elevations from one or both years.

3) Negative (-) values indicate groundwater elevations have declined since 2015, Positive (+) values indicate groundwater elevations have increased since 2015. Contours are graduated in color from red (-100) to blue (+100).

4) Aquifer designation information for individual wells was provided by FCGMA, CMWD and UWCD.

DUDEK

SOURCE: DWR; Ventura County; UWCD; CMWD

FIGURE 2-5

Oxnard Aquifer - Groundwater Elevation Changes from Fall 2015 to 2023

Groundwater Sustainability Plan for the Oxnard Subbasin: First Periodic Evaluation

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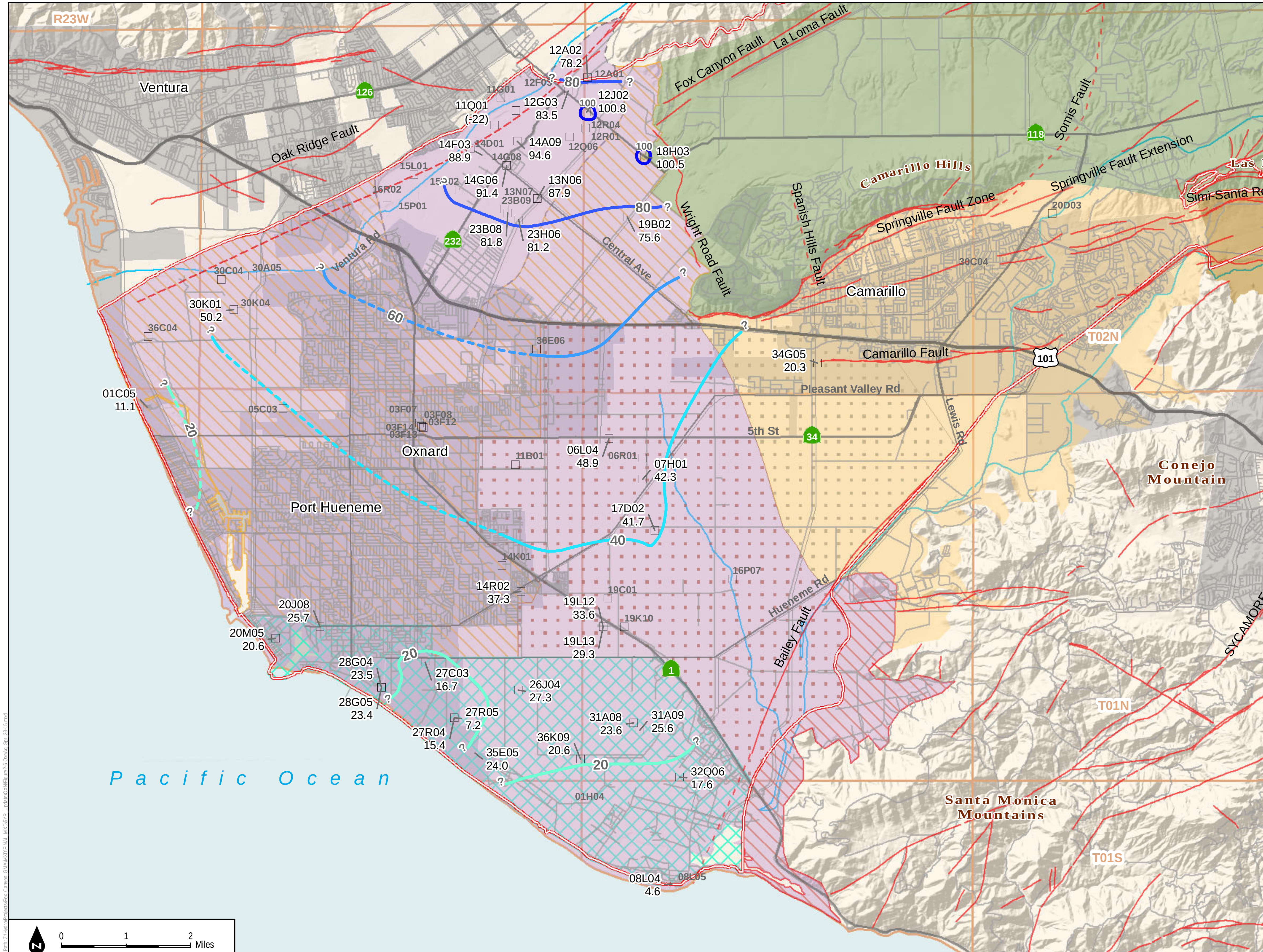

Legend

Contour of equal groundwater elevation change (feet) since 2015. Dashed where approximate; queried where inferred. See Note 3.

Wells screened in the Oxnard Aquifer

15P01 Abbreviated State Well Number (see notes)

+14.7 Difference in Spring 2024 to Spring 2015 Groundwater Elevations

Fox Canyon Groundwater Management Agency Boundary

Faults (Dashed Where Inferred)

Forebay Management Area

East Oxnard Plain Management Area (EOPMA)

West Oxnard Plain Management Area (WOPMA)

Oxnard Pumping Depression Management Area

Saline Intrusion Management Area

Pleasant Valley Pumping Depression Management Area

Township (North-South) and Range (East-West)

Bulletin 118 Groundwater Basins and Subbasin (DWR 2018)

Arroyo Santa Rosa Valley (4-007)

Las Posas Valley (4-008)

Pleasant Valley (4-006)

Oxnard (4-004.02)

Notes:

1) Well labels consist of an abbreviated State Well Number (SWN) and a groundwater elevation change since 2015 beneath it. SWNs are based on Township and Range in the Public Land Survey System. To construct a full SWN from the abbreviation shown on the map, concatenate the Township, Range, abbreviation, and the letter "S". Example: the SWN for the well labeled "29B02" located in Township 02N (T02N) and Range 20W (R20W) is 02N20W29B02S.

2) Gray SWN abbreviation with no water level difference is missing groundwater elevations from one or both years.

3) Negative (-) values indicate groundwater elevations have declined since 2015, Positive (+) values indicate groundwater elevations have increased since 2015. Contours are graduated in color from red (-100) to blue (+100).

4) Aquifer designation information for individual wells was provided by FCGMA, CMWD and UWCD.

SOURCE: DWR; Ventura County; UWCD; CMWD

DUDEK

FIGURE 2-6

Oxnard Aquifer - Groundwater Elevation Changes from Spring 2015 to 2024

Groundwater Sustainability Plan for the Oxnard Subbasin: First Periodic Evaluation

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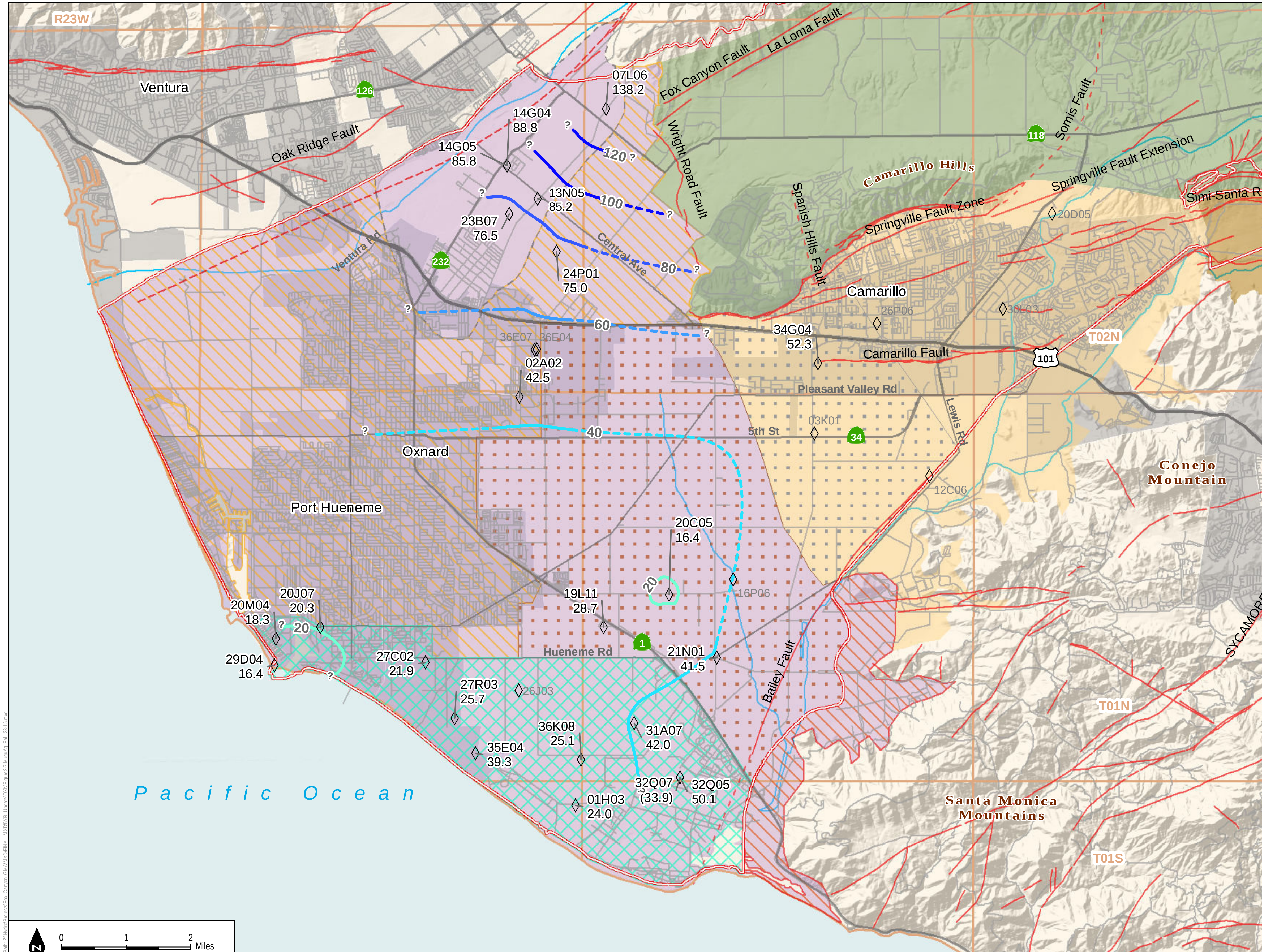

Legend

- Contour of equal groundwater elevation change (feet) since 2015. Dashed where approximate; queried where inferred. See Note 3.
- Wells screened in the Mugu Aquifer
- 15P01 Abbreviated State Well Number (see notes)
- +14.7 Change in groundwater elevation (in Feet) from Fall 2023 to Fall 2015
- Faults (Dashed Where Inferred)
- Fox Canyon Groundwater Management Agency Boundary
- Forebay Management Area
- East Oxnard Plain Management Area (EOPMA)
- West Oxnard Plain Management Area (WOPMA)
- Oxnard Pumping Depression Management Area
- Saline Intrusion Management
- Pleasant Valley Pumping Depression Management Area
- Township (North-South) and Range (East-West)

Bulletin 118 Groundwater Basins and Subbasin (DWR 2018)

- Arroyo Santa Rosa Valley (4-007)
- Las Posas Valley (4-008)
- Pleasant Valley (4-006)
- Oxnard (4-004.02)

Notes:
1) Well labels consist of an abbreviated State Well Number (SWN) and a groundwater elevation change since 2015 beneath it. SWNs are based on Township and Range in the Public Land Survey System. To construct a full SWN from the abbreviation shown on the map, concatenate the Township, Range, abbreviation, and the letter "S". Example: the SWN for the well labeled "29B02" located in Township 02N (T02N) and Range 20W (R20W) is 02N20W29B02S.
2) Gray SWN abbreviation with no water level difference is missing groundwater elevations from one or both years.
3) Negative (-) values indicate groundwater elevations have declined since 2015, Positive (+) values indicate groundwater elevations have increased since 2015. Contours are graduated in color from red (-100) to blue (+100).
4) Aquifer designation information for individual wells was provided by FCGMA, CMWD and UWCD.

DUDEK

SOURCE: DWR; Ventura County; UWCD; CMWD

FIGURE 2-7

Mugu Aquifer - Groundwater Elevation Changes from Fall 2015 to 2023

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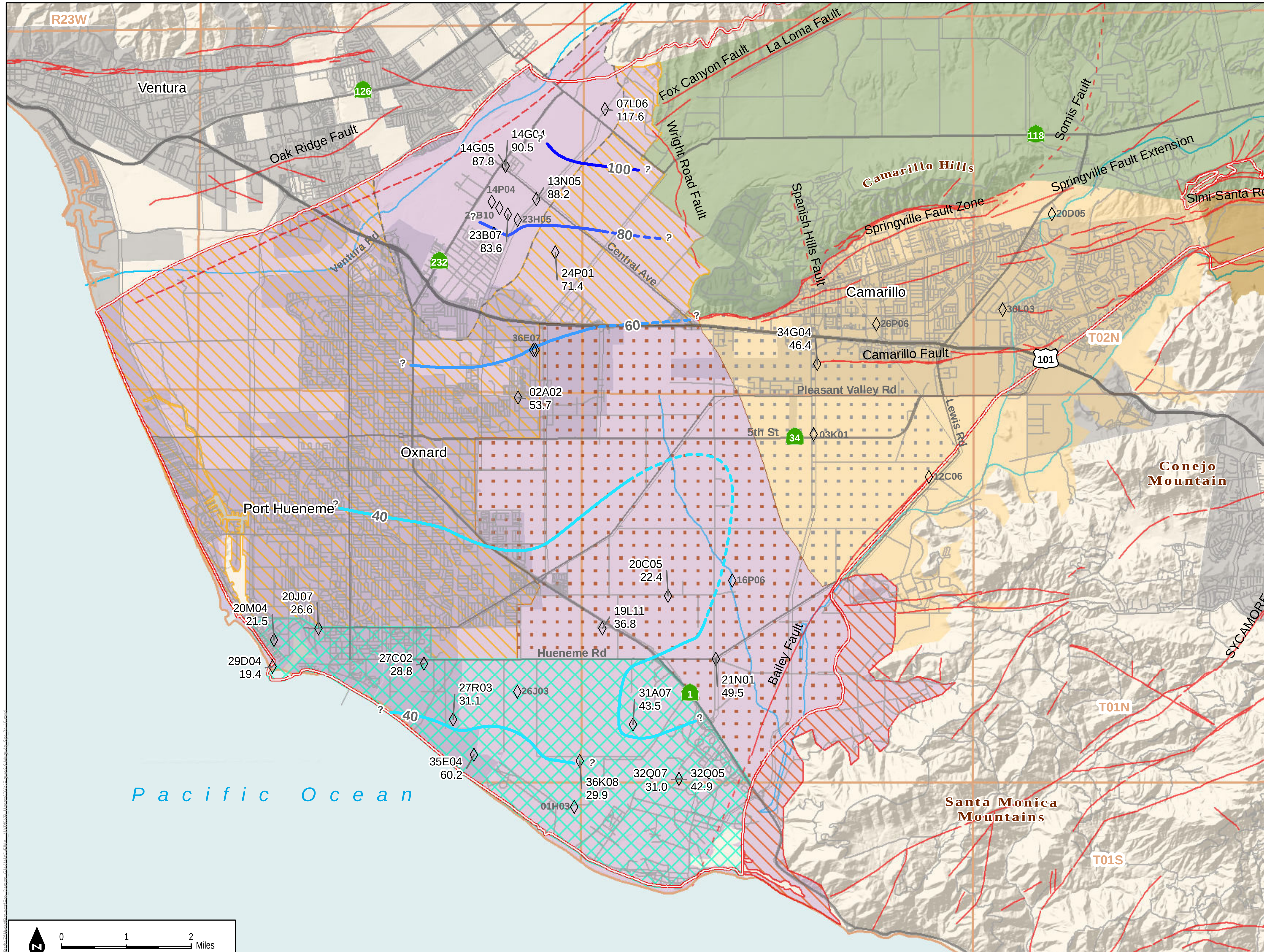

Legend

Contour of equal groundwater elevation change (feet) since 2015. Dashed where approximate; queried where inferred. See Note 3.

Wells screened in the Mugu Aquifer

15P01 Abbreviated State Well Number (see notes)

+14.7 Change in groundwater elevation (in Feet) from Spring 2024 to Spring 2015

Fox Canyon Groundwater Management Agency Boundary

Faults (Dashed Where Inferred)

Forebay Management Area

East Oxnard Plain Management Area (EOPMA)

West Oxnard Plain Management Area (WOPMA)

Oxnard Pumping Depression Management Area

Saline Intrusion Management Area

Pleasant Valley Pumping Depression Management Area

Township (North-South) and Range (East-West)

Bulletin 118 Groundwater Basins and Subbasin (DWR 2018)

Arroyo Santa Rosa Valley (4-007)

Las Posas Valley (4-008)

Pleasant Valley (4-006)

Oxnard (4-004.02)

Notes:

1) Well labels consist of an abbreviated State Well Number (SWN) and a groundwater elevation change since 2015 beneath it. SWNs are based on Township and Range in the Public Land Survey System. To construct a full SWN from the abbreviation shown on the map, concatenate the Township, Range, abbreviation, and the letter "S". Example: the SWN for the well labeled "29B02" located in Township 02N (T02N) and Range 20W (R20W) is 02N20W29B02S.

2) Gray SWN abbreviation with no water level difference is missing groundwater elevations from one or both years.

3) Negative (-) values indicate groundwater elevations have declined since 2015, Positive (+) values indicate groundwater elevations have increased since 2015. Contours are graduated in color from red (-100) to blue (+100).

4) Aquifer designation information for individual wells was provided by FCGMA, CMWD and UWCD.

DUDEK

SOURCE: DWR; Ventura County; UWCD; CMWD

FIGURE 2-8

Mugu Aquifer - Groundwater Elevation Changes from Spring 2015 to 2024

Groundwater Sustainability Plan for the Oxnard Subbasin: First Periodic Evaluation

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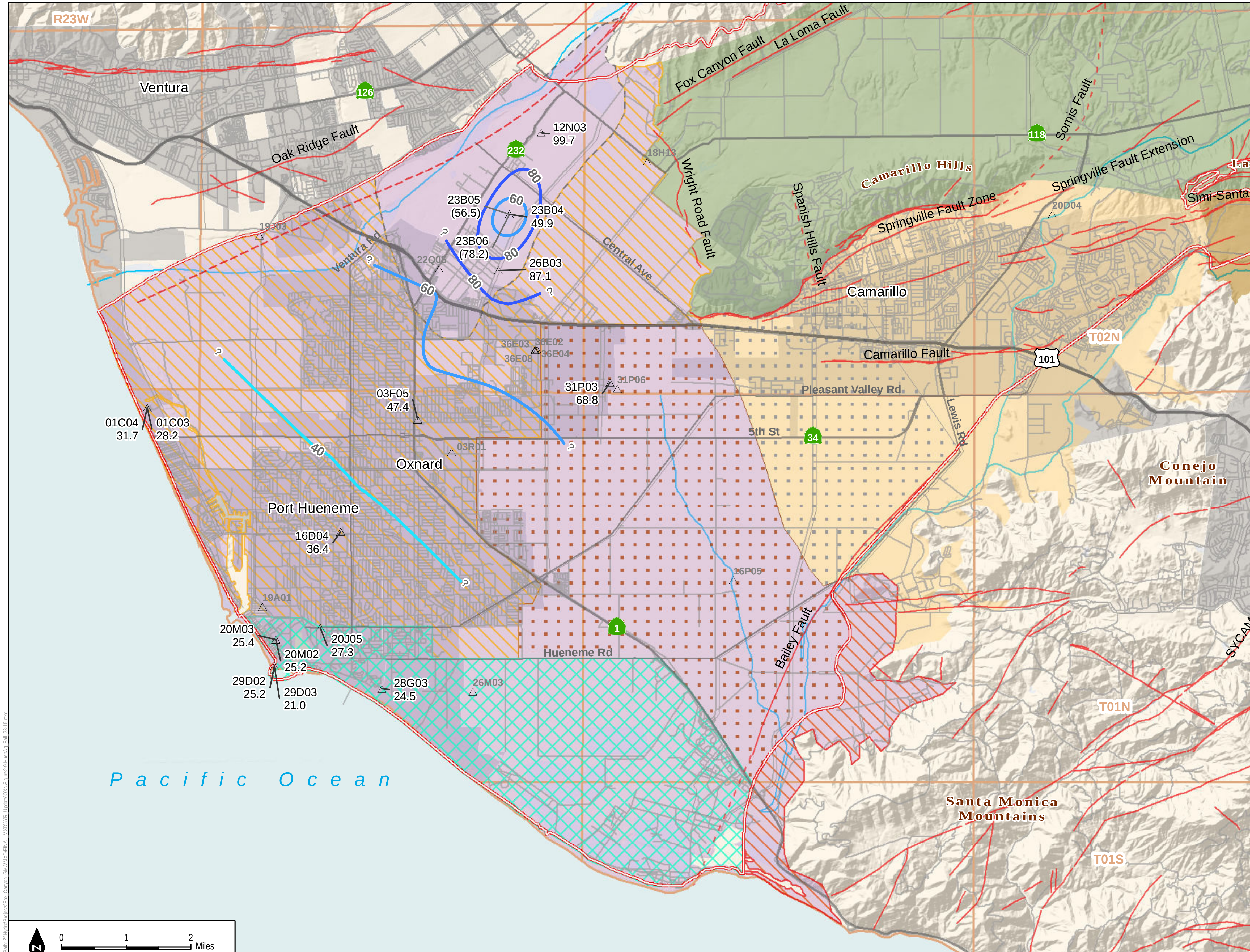

Legend

Contour of equal groundwater elevation change (feet) since 2015. Dashed where approximate; queried where inferred. See Note 3.

Wells Screened in the Hueneme Aquifer

15P01 Abbreviated State Well Number (see notes)

+14.7 Change in groundwater elevation (in feet) from Fall 2015 to Fall 2023

(+14.7) Change in groundwater elevations are not used to create contours

Fox Canyon Groundwater Management Agency Boundary

Faults (Dashed Where Inferred)

Forebay Management Area

East Oxnard Plain Management Area (EOPMA)

West Oxnard Plain Management Area (WOPMA)

Oxnard Pumping Depression Management Area

Saline Intrusion Management Area

Pleasant Valley Pumping Depression Management Area

Township (North-South) and Range (East-West)

Bulletin 118 Groundwater Basins and Subbasin (DWR 2018)

Arroyo Santa Rosa Valley (4-007)

Las Posas Valley (4-008)

Pleasant Valley (4-006)

Oxnard (4-004.02)

Notes:

1) Well labels consist of an abbreviated State Well Number (SWN) and a groundwater elevation change since 2015 beneath it. SWNs are based on Township and Range in the Public Land Survey System. To construct a full SWN from the abbreviation shown on the map, concatenate the Township, Range, abbreviation, and the letter "S". Example: the SWN for the well labeled "29B02" located in Township 02N (T02N) and Range 20W (R20W) is 02N20W29B02S.

2) Gray SWN abbreviation with no water level difference is missing groundwater elevations from one or both years.

3) Negative (-) values indicate groundwater elevations have declined since 2015, Positive (+) values indicate groundwater elevations have increased since 2015. Contours are graduated in color from red (-100) to blue (+100).

4) Aquifer designation information for individual wells was provided by FCGMA, CMWD and UWCD.

SOURCE: DWR; Ventura County; UWCD; CMWD

FIGURE 2-9

Hueneme Aquifer - Groundwater Elevation Changes from Fall 2015 to 2023

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Groundwater Sustainability Plan for the Oxnard Subbasin: First Periodic Evaluation

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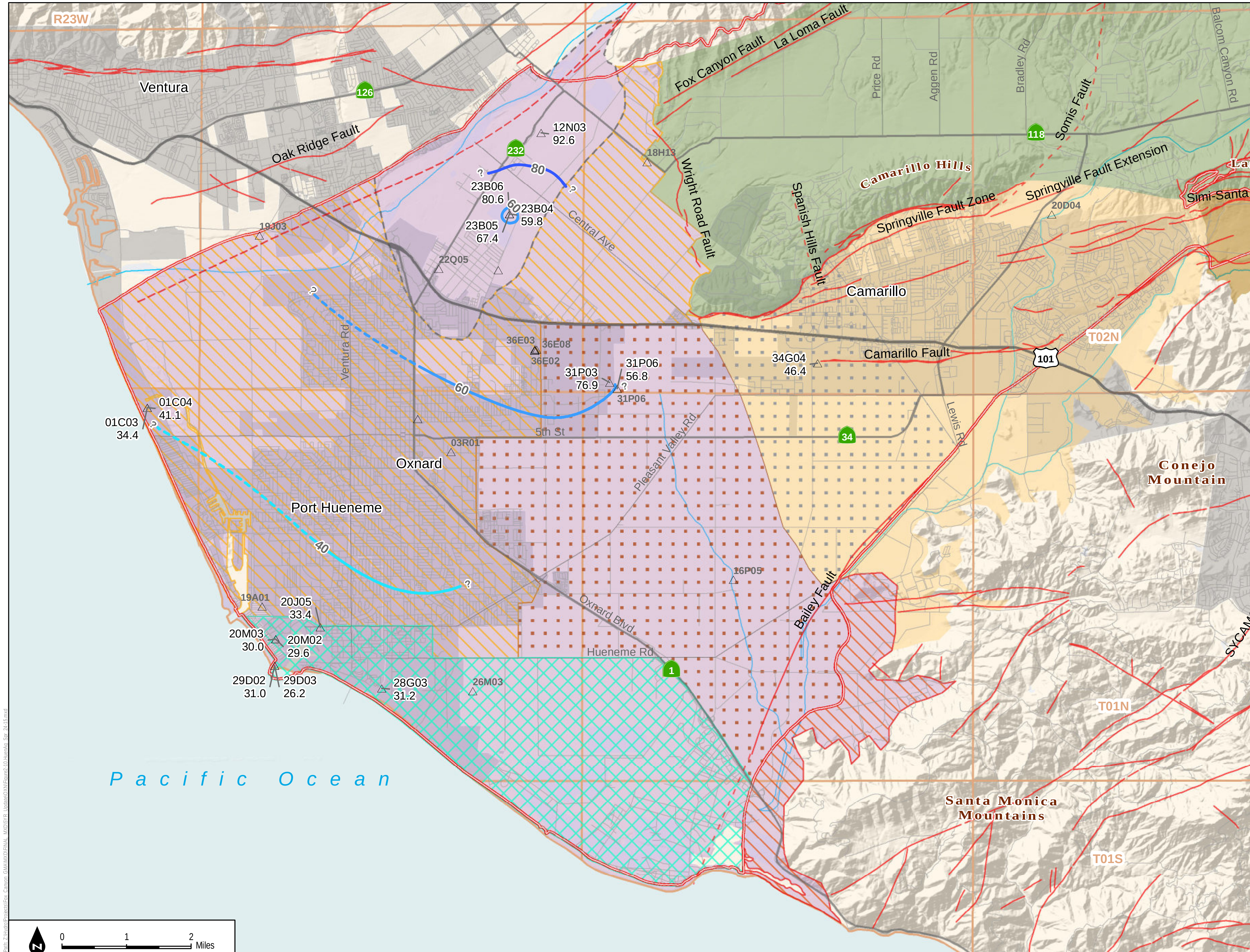

Legend

Contour of equal groundwater elevation change (feet) since 2015. Dashed where approximate; queried where inferred. See Note 3.

△ Wells Screened in the Hueneme Aquifer

15P01 Abbreviated State Well Number (see notes)

+14.7 Change in groundwater elevation (in feet) from Spring 2015 to Spring 2024

(+14.7) Change in groundwater elevations are not used to create contours

Fox Canyon Groundwater Management Agency Boundary

Faults (Dashed Where Inferred)

Forebay Management Area

East Oxnard Plain Management Area (EOPMA)

West Oxnard Plain Management Area (WOPMA)

Oxnard Pumping Depression Management Area

Saline Intrusion Management

Pleasant Valley Pumping Depression Management Area

Township (North-South) and Range (East-West)

Bulletin 118 Groundwater Basins and Subbasin (DWR 2018)

Arroyo Santa Rosa Valley (4-007)

Las Posas Valley (4-008)

Pleasant Valley (4-006)

Oxnard (4-004.02)

Notes:
1) Well labels consist of an abbreviated State Well Number (SWN) and a groundwater elevation change since 2015 beneath it. SWNs are based on Township and Range in the Public Land Survey System. To construct a full SWN from the abbreviation shown on the map, concatenate the Township, Range, abbreviation, and the letter "S". Example: the SWN for the well labeled "29B02" located in Township 02N (T02N) and Range 20W (R20W) is 02N20W29B02S.
2) Gray SWN abbreviation with no water level difference is missing groundwater elevations from one or both years.
3) Negative (-) values indicate groundwater elevations have declined since 2015, Positive (+) values indicate groundwater elevations have increased since 2015. Contours are graduated in color from red (-100) to blue (+100).
4) Aquifer designation information for individual wells was provided by FCGMA, CMWD and UWCD.

SOURCE: DWR; Ventura County; UWCD; CMWD

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FIGURE 2-10

Hueneme Aquifer - Groundwater Elevation Changes from Spring 2015 to 2024

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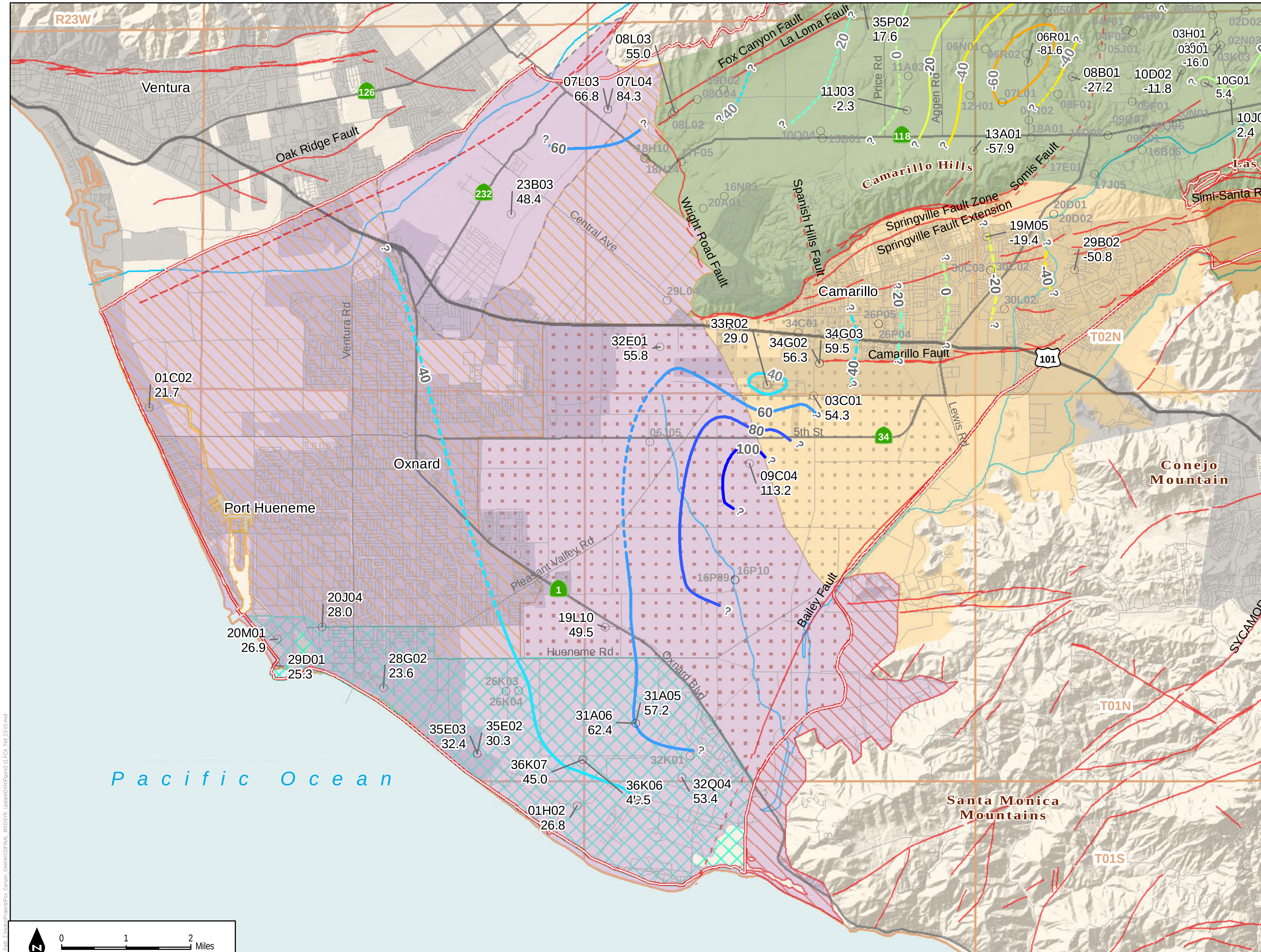

Legend

- Contour of equal groundwater elevation change (feet) since 2015. Dashed where approximate; queried where inferred. See Note 3.
- Wells Screened in the Fox Canyon Aquifer
- 19M05 Abbreviated State Well Number (see notes)
- +19 Change in groundwater elevation (in feet) from Fall 2015 to Fall 2023
- Fox Canyon Groundwater Management Agency Boundary
- Faults (Dashed Where Inferred)
- Forebay Management Area
- East Oxnard Plain Management Area (EOPMA)
- West Oxnard Plain Management Area (WOPMA)
- Oxnard Pumping Depression Management Area
- Saline Intrusion Management Area
- Pleasant Valley Pumping Depression Management Area
- Township (North-South) and Range (East-West)

Revised Bulletin 118 Groundwater Basins and Subbasins (DWR 2018)

- Arroyo Santa Rosa Valley (4-007)
- Las Posas Valley (4-008)
- Pleasant Valley (4-006)
- Oxnard (4-004.02)

Notes:

1) Well labels consist of an abbreviated State Well Number (SWN) and a groundwater elevation change since 2015 beneath it. SWNs are based on Township and Range in the Public Land Survey System. To construct a full SWN from the abbreviation shown on the map, concatenate the Township, Range, abbreviation, and the letter "S". Example: the SWN for the well labeled "29B02" located in Township 02N (T02N) and Range 20W (R20W) is 02N20W29B02S.
2) Gray SWN abbreviation with no water level difference is missing groundwater elevations from one or both years.
3) Negative (-) values indicate groundwater elevations have declined since 2015, Positive (+) values indicate groundwater elevations have increased since 2015. Contours are graduated in color from red (-100) to blue (+100).
4) Aquifer designation information for individual wells was provided by FCGMA, CMWD and UWCD.

SOURCE: DWR; Ventura County; UWCD; CMWD

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FIGURE 2-11

Fox Canyon Aquifer - Groundwater Elevation Changes from Fall 2015 to 2023

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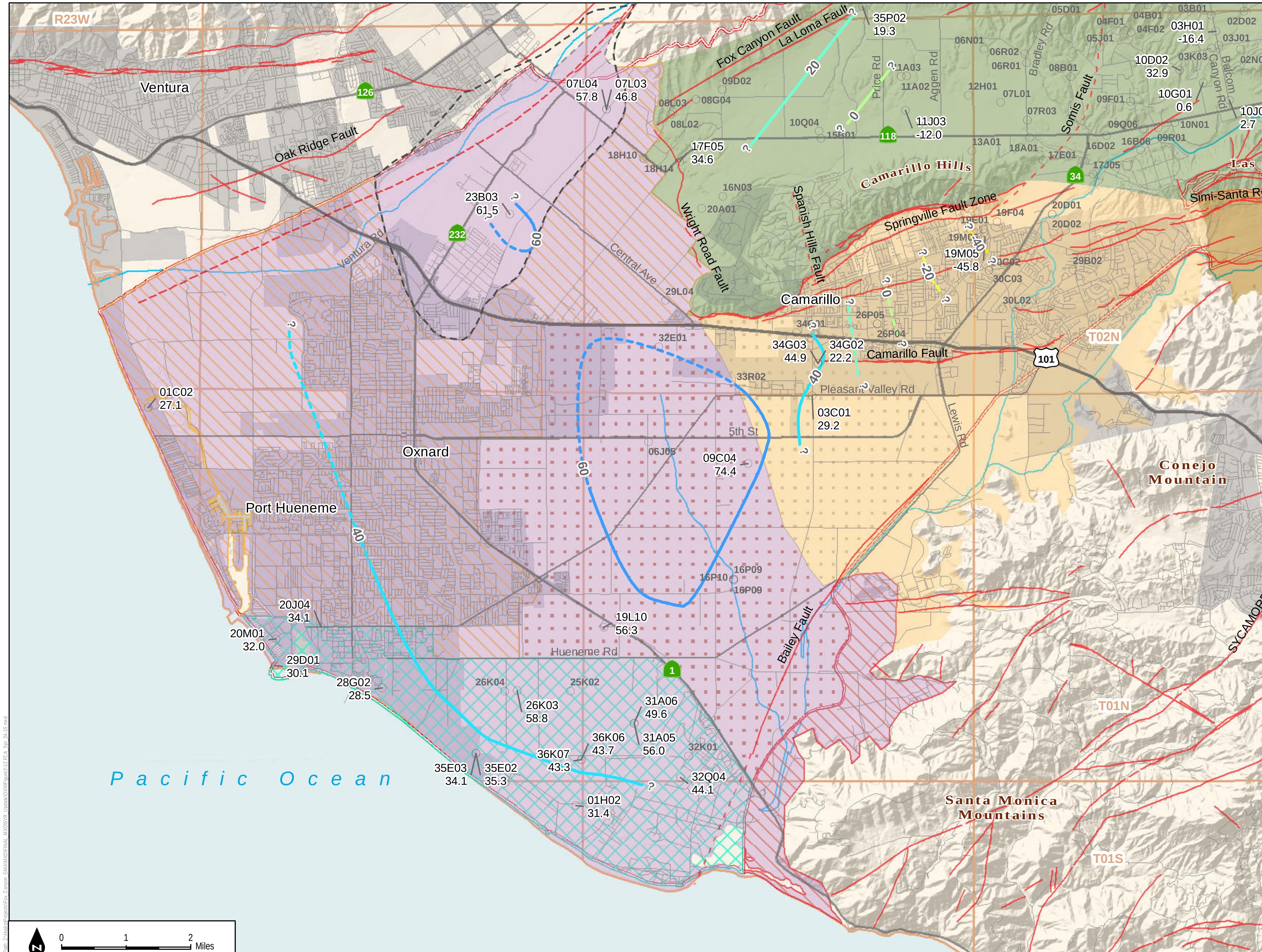

Legend

- Contour of equal groundwater elevation change (feet) since 2015. Dashed where approximate; queried where inferred. See Note 3.
- Wells Screened in the Fox Canyon Aquifer
- 19M05 Abbreviated State Well Number (see notes)
- +19 Change in groundwater elevation (in feet) from Spring 2015 to Spring 2024
- Faults (Dashed Where Inferred)
- Pleasant Valley Pumping Depression Management Area
- Forebay Management Area
- East Oxnard Plain Management Area (EOPMA)
- West Oxnard Plain Management Area
- Oxnard Pumping Depression Management Area
- Saline Intrusion Management Area
- Fox Canyon Groundwater Management Agency Boundary
- Township (North-South) and Range (East-West)

Revised Bulletin 118 Groundwater Basins and Subbasin (DWR 2018)

- Arroyo Santa Rosa Valley (4-007)
- Las Posas Valley (4-008)
- Pleasant Valley (4-006)
- Oxnard (4-004.02)

Notes:
1) Well labels consist of an abbreviated State Well Number (SWN) and a groundwater elevation change since 2015 beneath it. SWNs are based on Township and Range in the Public Land Survey System. To construct a full SWN from the abbreviation shown on the map, concatenate the Township, Range, abbreviation, and the letter "S". Example: the SWN for the well labeled "29B02" located in Township 02N (T02N) and Range 20W (R20W) is 02N20W29B02S.
2) Gray SWN abbreviation with no water level difference is missing groundwater elevations from one or both years.
3) Negative (-) values indicate groundwater elevations have declined since 2015, Positive (+) values indicate groundwater elevations have increased since 2015. Contours are graduated in color from red (-100) to blue (+100).
4) Aquifer designation information for individual wells was provided by FCGMA, CMWD and UWCD.

0 1 2 Miles

SOURCE: DWR; Ventura County; UWCD; CMWD

DUDEK

FIGURE 2-12

Fox Canyon Aquifer - Groundwater Elevation Changes from Spring 2015 to 2024

Groundwater Sustainability Plan for the Oxnard Subbasin: First Periodic Evaluation

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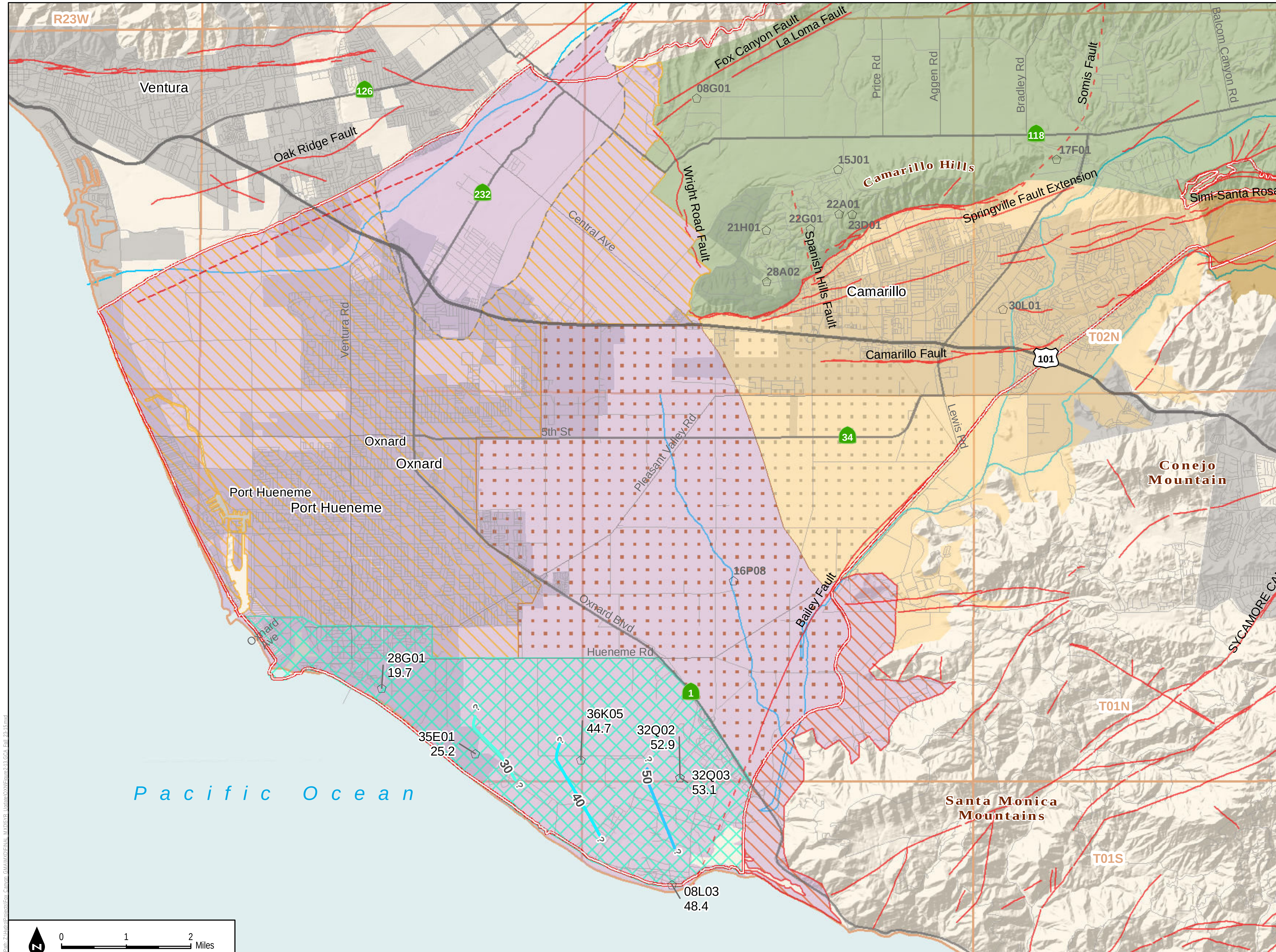

Legend

- Contour of equal groundwater elevation change (feet) since 2015. Dashed where approximate; queried where inferred. See Note 3.
- Wells screened in Grimes Canyon Aquifer
- 15P01 Abbreviated State Well Number (see notes)
- +14.7 Change in groundwater elevation (in feet) from Fall 2015 to Fall 2023
- Fox Canyon Groundwater Management Agency Boundary
- Faults (Dashed Where Inferred)
- Forebay Management Area
- East Oxnard Plain Management Area (EOPMA)
- West Oxnard Plain Management Area (WOPMA)
- Oxnard Pumping Depression Management Area
- Saline Intrusion Management Area
- Pleasant Valley Pumping Depression Management Area
- Township (North-South) and Range (East-West)

Bulletin 118 Groundwater Basins and Subbasin (DWR 2018)

- Arroyo Santa Rosa Valley (4-007)
- Las Posas Valley (4-008)
- Pleasant Valley (4-006)
- Oxnard (4-004.02)

Notes:
1) Well labels consist of an abbreviated State Well Number (SWN) and a groundwater elevation change since 2015 beneath it. SWNs are based on Township and Range in the Public Land Survey System. To construct a full SWN from the abbreviation shown on the map, concatenate the Township, Range, abbreviation, and the letter "S". Example: the SWN for the well labeled "29B02" located in Township 02N (T02N) and Range 20W (R20W) is 02N20W29B02S.
2) Gray SWN abbreviation with no water level difference is missing groundwater elevations from one or both years.
3) Negative (-) values indicate groundwater elevations have declined since 2015, Positive (+) values indicate groundwater elevations have increased since 2015. Contours are graduated in color from red (-100) to blue (+100).
4) Aquifer designation information for individual wells was provided by FCGMA, CMWD and UWCD.

DUDEK

SOURCE: DWR; Ventura County; UWCD; CMWD

FIGURE 2-13

Grimes Canyon Aquifer - Groundwater Elevation Changes from Fall 2015 to 2023

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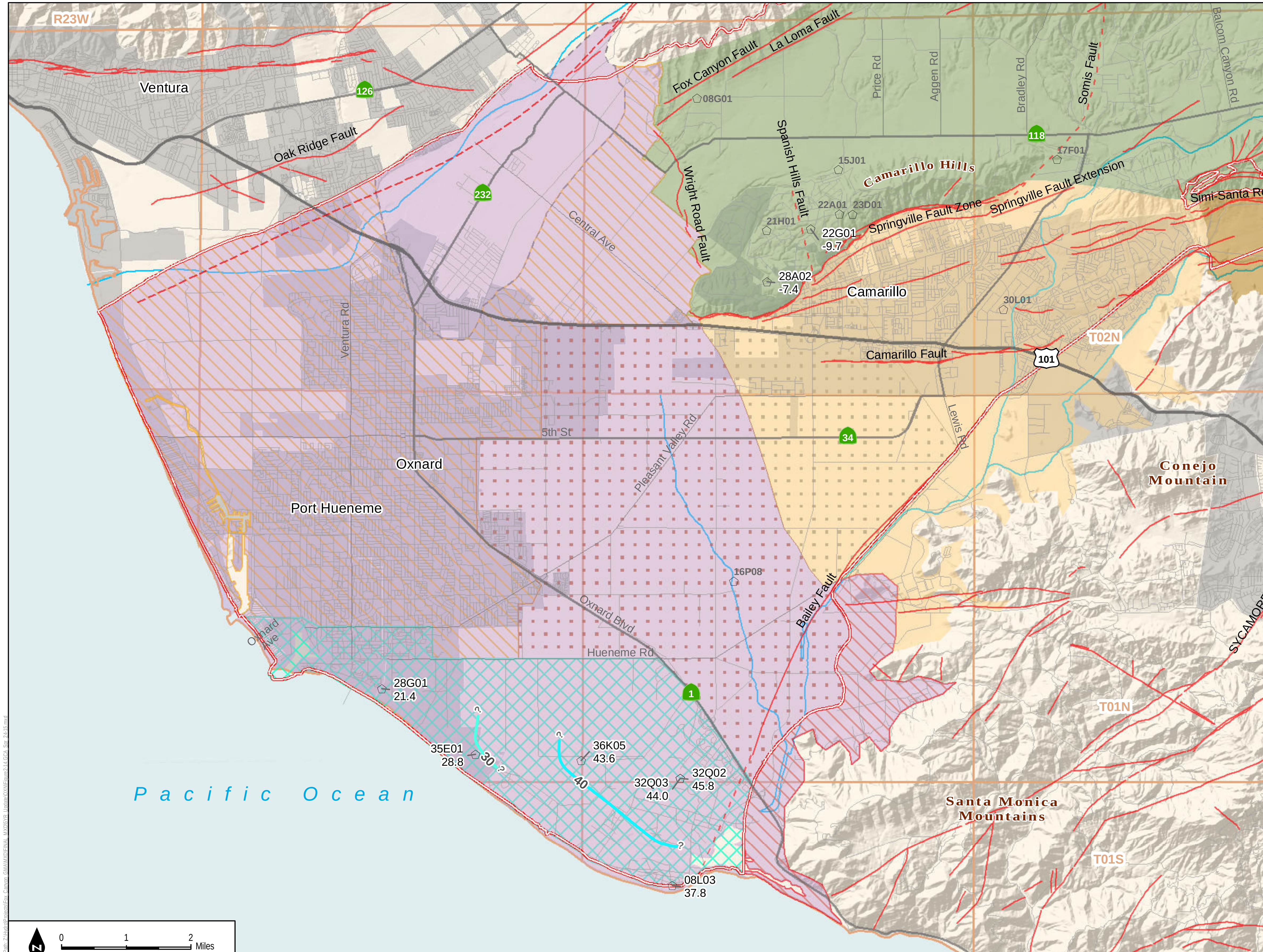

Legend

Contour of equal groundwater elevation change (feet) since 2015. Dashed where approximate; queried where inferred. See Note 3.

Wells screened in Grimes Canyon Aquifer

15P01 Abbreviated State Well Number (see notes)

+14.7 Change in groundwater elevation (in feet) from Spring 2015 to Spring 2023

Fox Canyon Groundwater Management Agency Boundary

Faults (Dashed Where Inferred)

Forebay Management Area

East Oxnard Plain Management Area (EOPMA)

West Oxnard Plain Management Area (WOPMA)

Oxnard Pumping Depression Management Area

Saline Intrusion Management

Pleasant Valley Pumping Depression Management Area

Township (North-South) and Range (East-West)

Bulletin 118 Groundwater Basins and Subbasin (DWR 2018)

Arroyo Santa Rosa Valley (4-007)

Las Posas Valley (4-008)

Pleasant Valley (4-006)

Oxnard (4-004.02)

Notes:

1) Well labels consist of an abbreviated State Well Number (SWN) and a groundwater elevation change since 2015 beneath it. SWNs are based on Township and Range in the Public Land Survey System. To construct a full SWN from the abbreviation shown on the map, concatenate the Township, Range, abbreviation, and the letter "S". Example: the SWN for the well labeled "29B02" located in Township 02N (T02N) and Range 20W (R20W) is 02N20W29B02S.

2) Gray SWN abbreviation with no water level difference is missing groundwater elevations from one or both years.

3) Negative (-) values indicate groundwater elevations have declined since 2015, Positive (+) values indicate groundwater elevations have increased since 2015. Contours are graduated in color from red (-100) to blue (+100).

4) Aquifer designation information for individual wells was provided by FCGMA, CMWD and UWCD.

DUDEK

SOURCE: DWR; Ventura County; UWCD; CMWD

FIGURE 2-14

Grimes Canyon Aquifer - Groundwater Elevation Changes from Spring 2015 to 2024

Groundwater Sustainability Plan for the Oxnard Subbasin: First Periodic Evaluation

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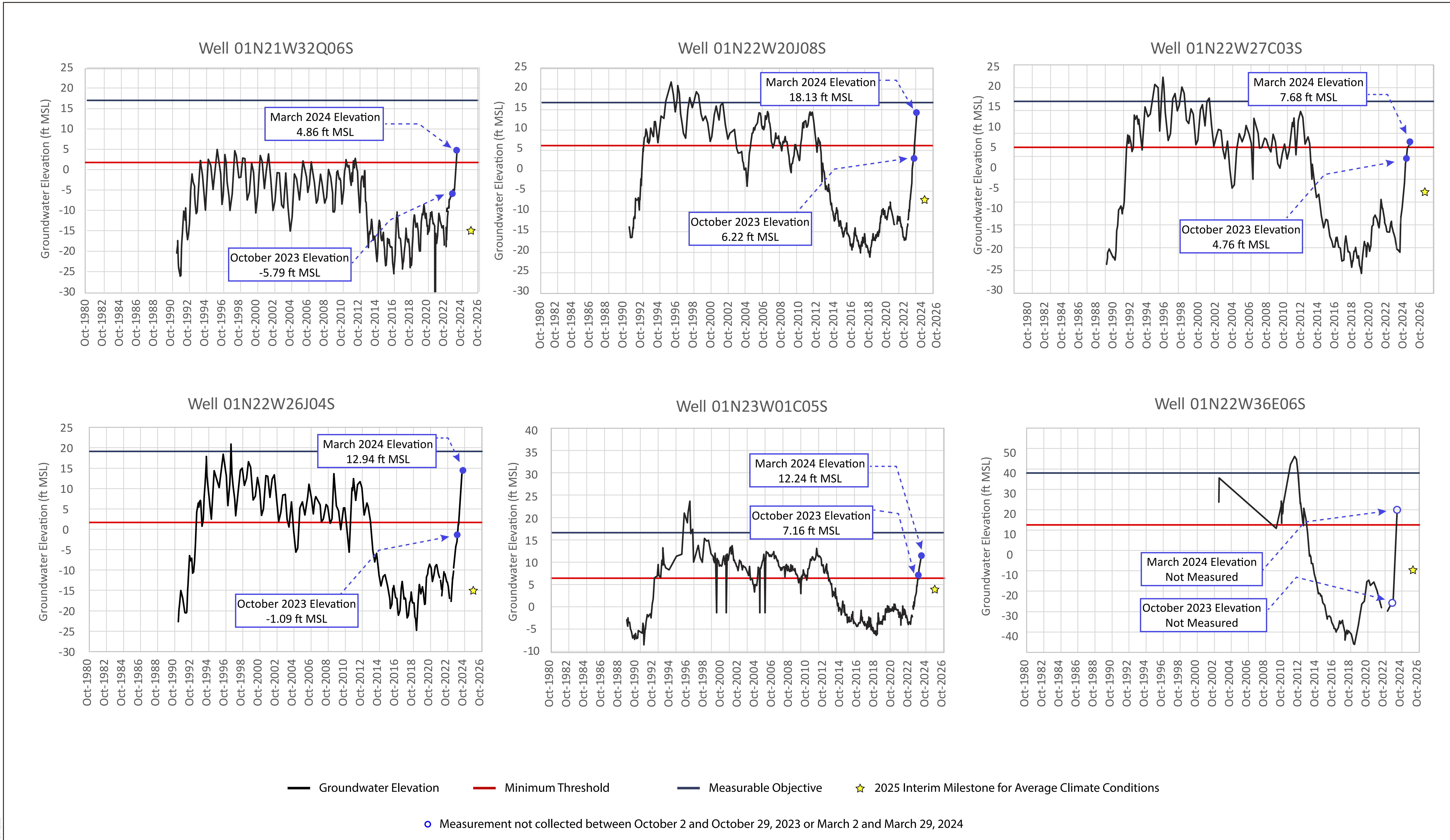

SOURCE: UWCD, VCWPD

FIGURE 2-15

Groundwater Elevation Hydrographs for Representative Monitoring Points in the Oxnard Aquifer

Groundwater Sustainability Plan for the Oxnard Subbasin: First Periodic Evaluation

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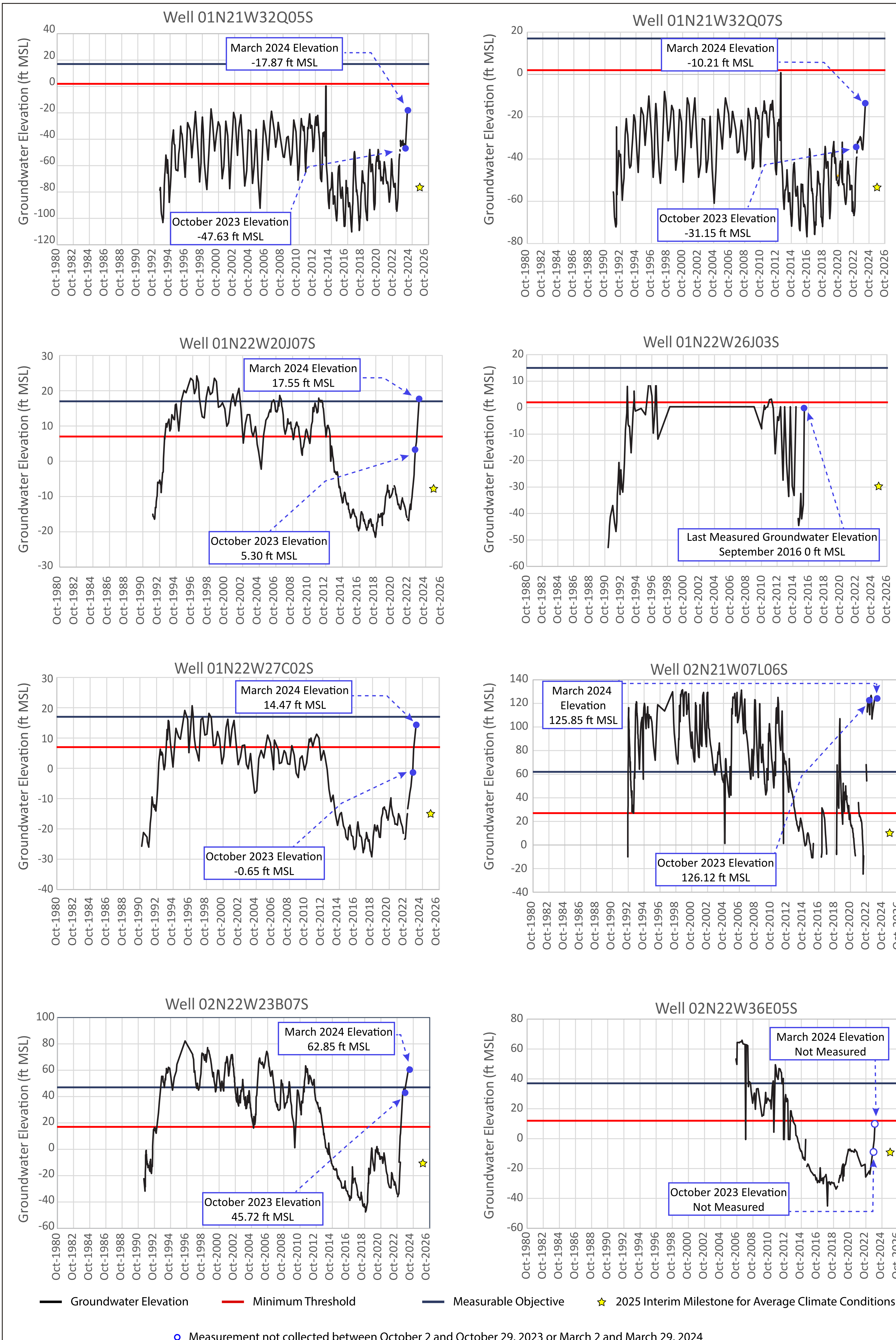

SOURCE: UWCD, VCWPD

FIGURE 2-16

Groundwater Elevation Hydrographs for Representative Monitoring Points in the Mugu Aquifer

Groundwater Sustainability Plan for the Oxnard Subbasin: First Periodic Evaluation

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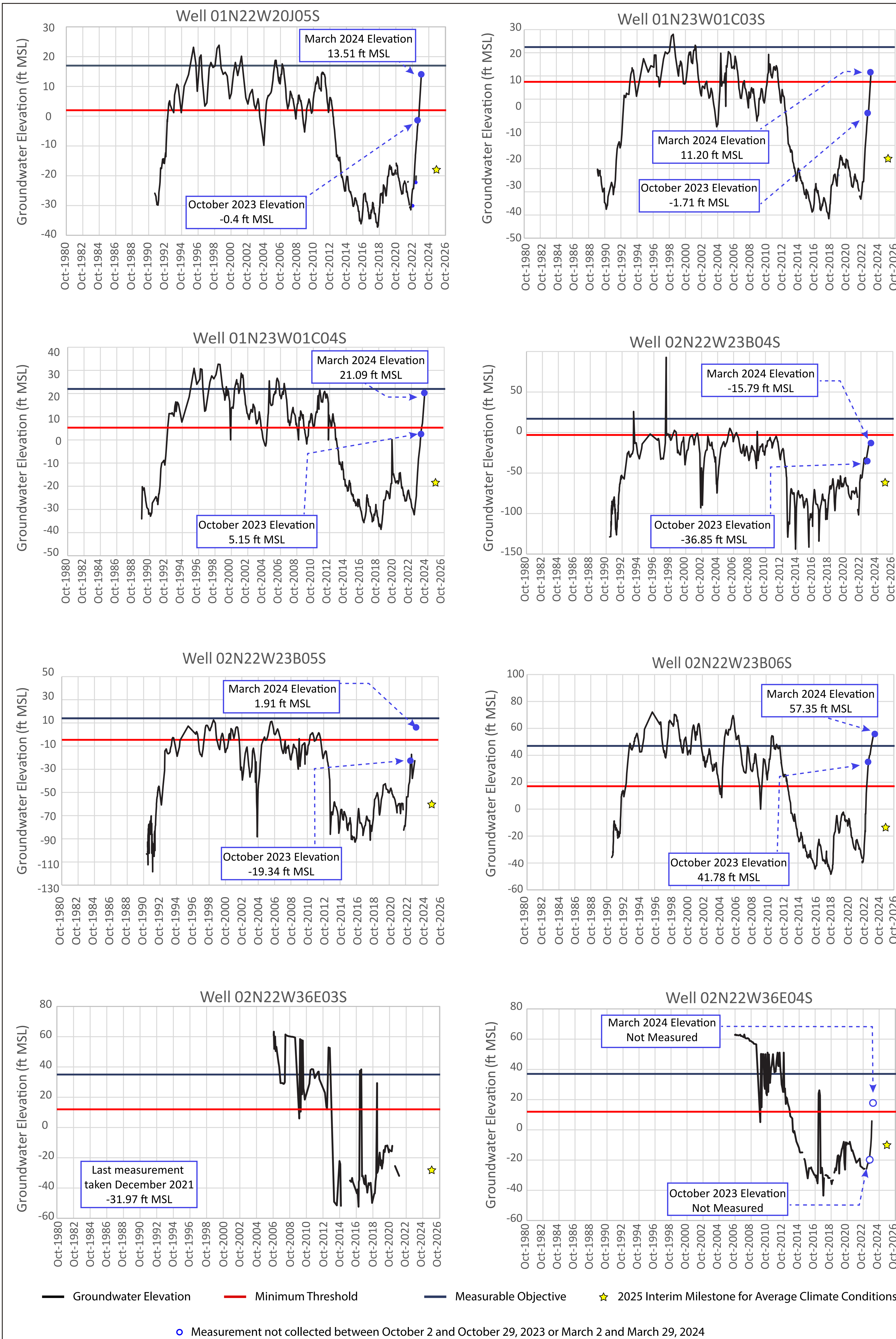

SOURCE: UWCD, VCWPD

FIGURE 2-17

Groundwater Elevation Hydrographs for Representative Monitoring Points in the Hueneme Aquifer

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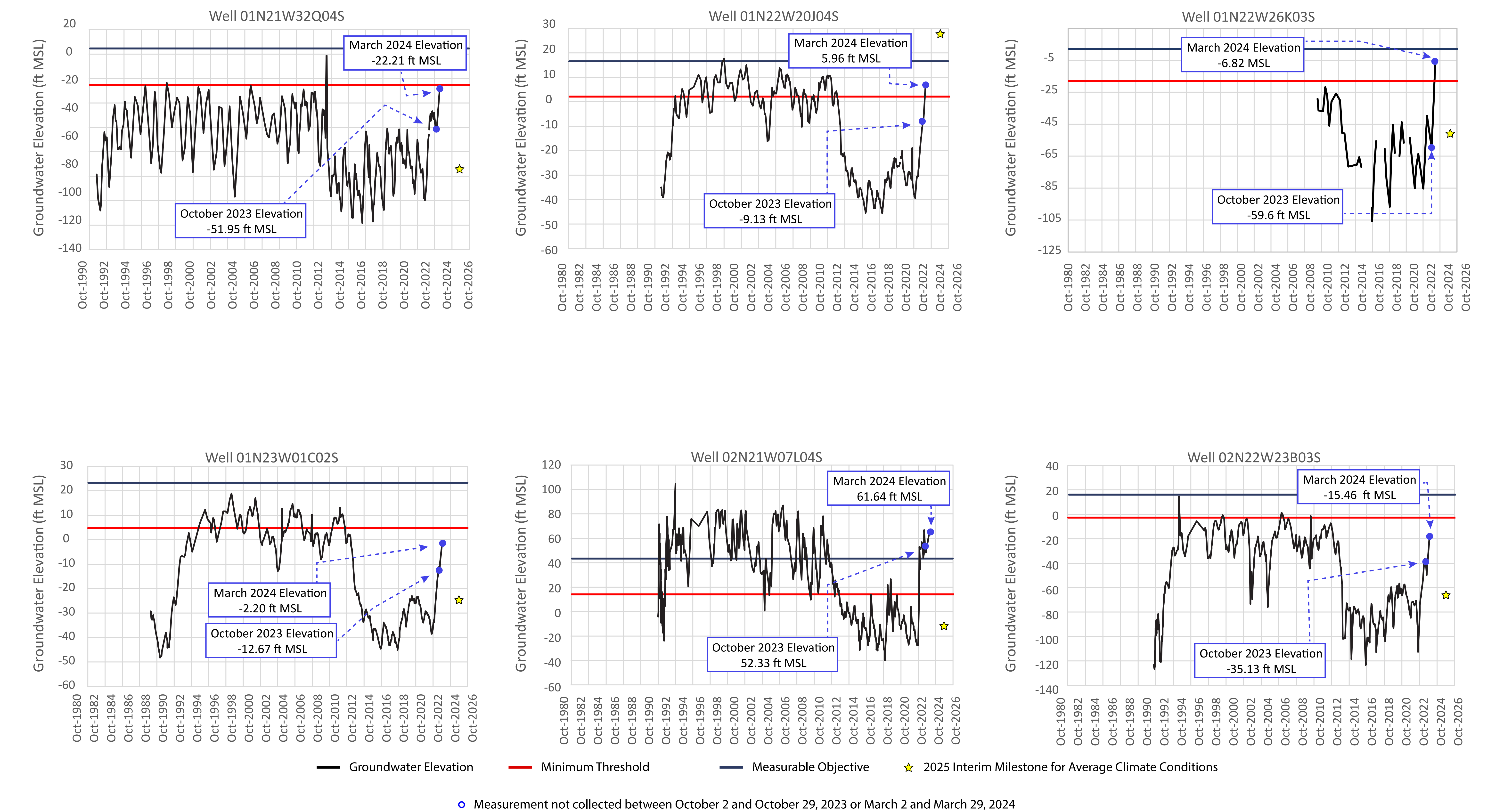

SOURCE: UWCD, VCWPD

FIGURE 2-18

Groundwater Elevation Hydrographs for Representative Monitoring Points in the Fox Canyon Aquifer

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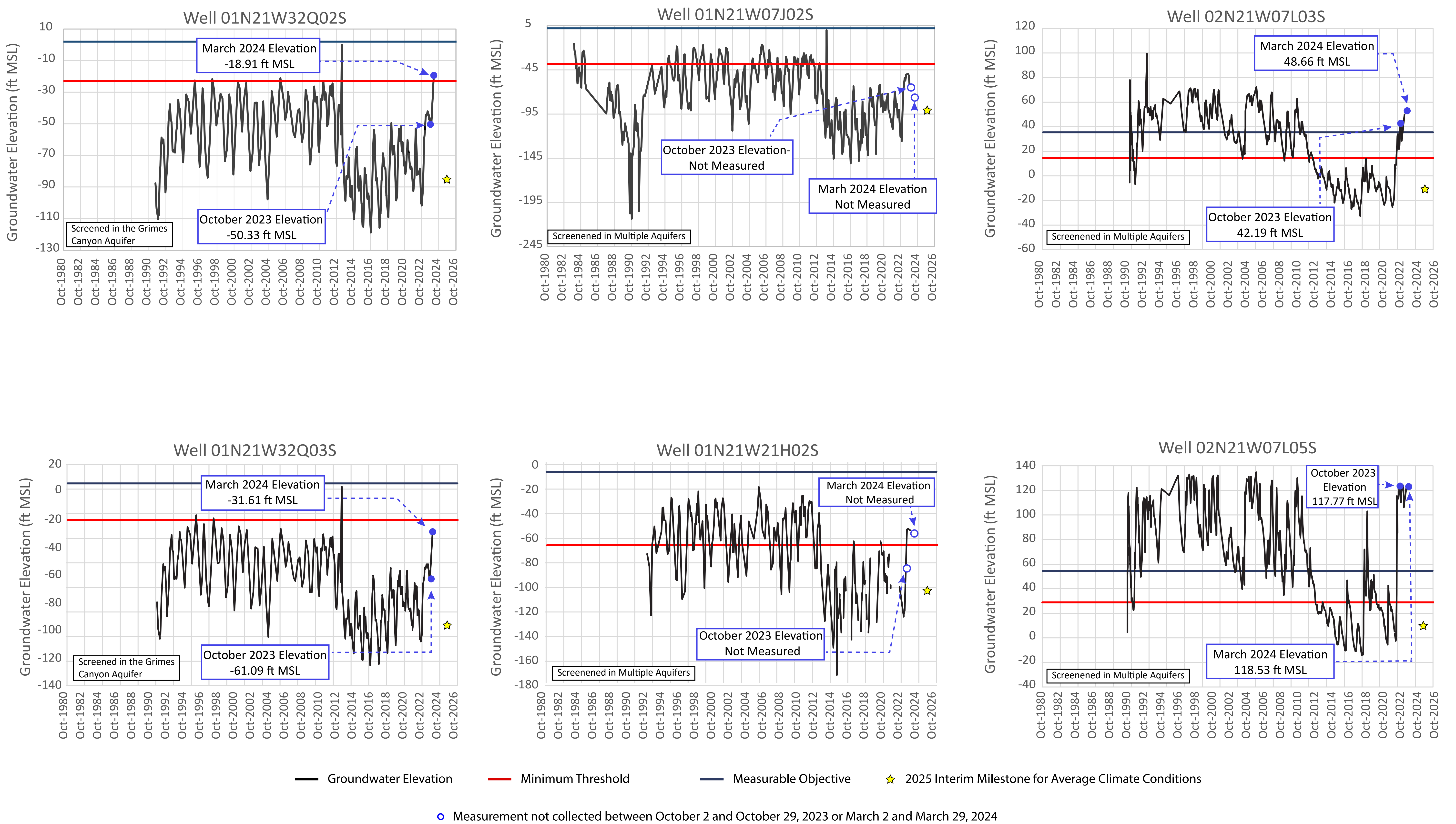

SOURCE: UWCD, VCWPD

FIGURE 2-19

Groundwater Elevation Hydrographs for Representative Monitoring Points in the Grimes Canyon Aquifer

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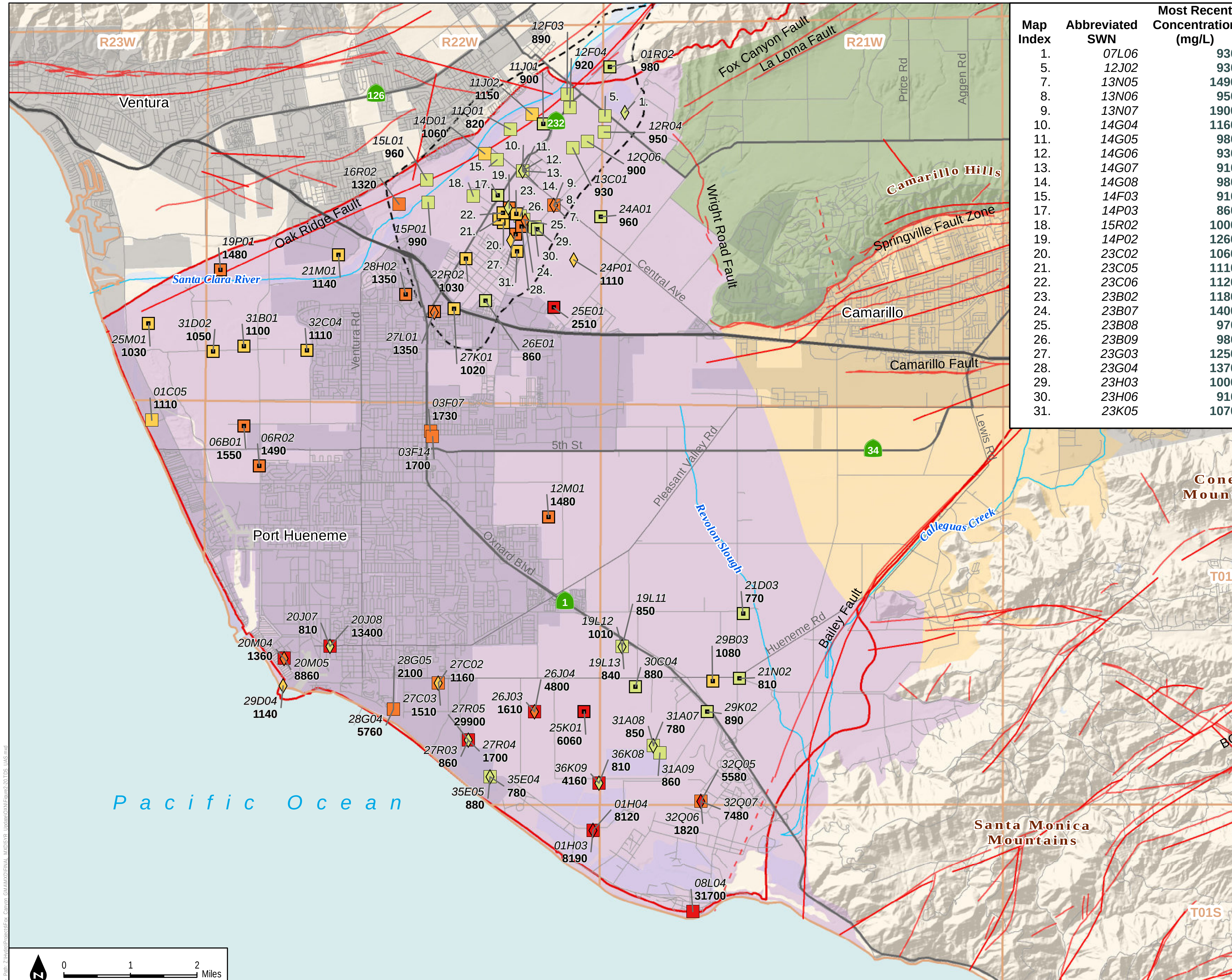

Map Index	Abbreviated SWN	Most Recent Concentration (mg/L)
1.	07L06	930
5.	12J02	930
7.	13N05	1490
8.	13N06	950
9.	13N07	1900
10.	14G04	1160
11.	14G05	980
12.	14G06	930
13.	14G07	910
14.	14G08	980
15.	14F03	910
17.	14P03	860
18.	15R02	1000
19.	14P02	1260
20.	23C02	1060
21.	23C05	1110
22.	23C06	1120
23.	23B02	1180
24.	23B07	1400
25.	23B08	970
26.	23B09	980
27.	23G03	1250
28.	23G04	1370
29.	23H03	1000
30.	23H06	910
31.	23K05	1070

Legend

- Fox Canyon Groundwater Management Agency Boundary (FCGMA 2016)
- Major Rivers/Stream Channels
- Township (North-South) and Range (East-West)
- Faults (Dashed Where Inferred)
- Oxnard Forebay

Revised Bulletin 118 Groundwater Basins and Subbasin (DWR 2018)

- Arroyo Santa Rosa Valley (4-007)
- Las Posas Valley (4-008)
- Pleasant Valley (4-006)
- Oxnard (4-004.02)

TDS concentration (mg/L), 2019-2023

- 290 - 500
- >500 - 750
- >750 - 1000
- >1000 - 1200
- >1200 - 2500
- >2500 - 49800

Aquifer designation

- Well screened in the Oxnard aquifer
- Well screened in the Mugu aquifer
- Wells screened in multiple aquifers in the UAS

15P01 Abbreviated State Well Number (see notes)
10.5 Concentration (mg/L)

Notes:
1) Well labels consist of an italicized abbreviated State Well Number (SWN) and a concentration value beneath it.The concentration is the most recent concentration measured in water quality samples collected at that well in the five years from 2019-2023.
2) SWNs are based on Township and Range in the Public Land Survey System. To construct a full SWN from the abbreviation shown on the map,concatenate the Township, Range, abbreviation, and the letter "S". Example: the SWN for the well labeled "15L01" located in Township 02N (T02N) and Range 22W (R22W) is 02N22W15L01S.
3) The shape of each well symbol corresponds to the aquifer(s) in which it is screened (see above).
4) The color of each well symbol corresponds to the most recent concentration measured in a water quality sample from that well.
5) All concentrations are in mg/L.
6) Aquifer designation information for individual wells was provided by FCGMA, CMWD and UWCD.

SOURCE: DWR, FCGMA, VCWPD, CMWD, UWCD

DUDEK

FIGURE 2-20

Upper Aquifer System - Most Recent TDS (mg/L) Measured 2019-2023

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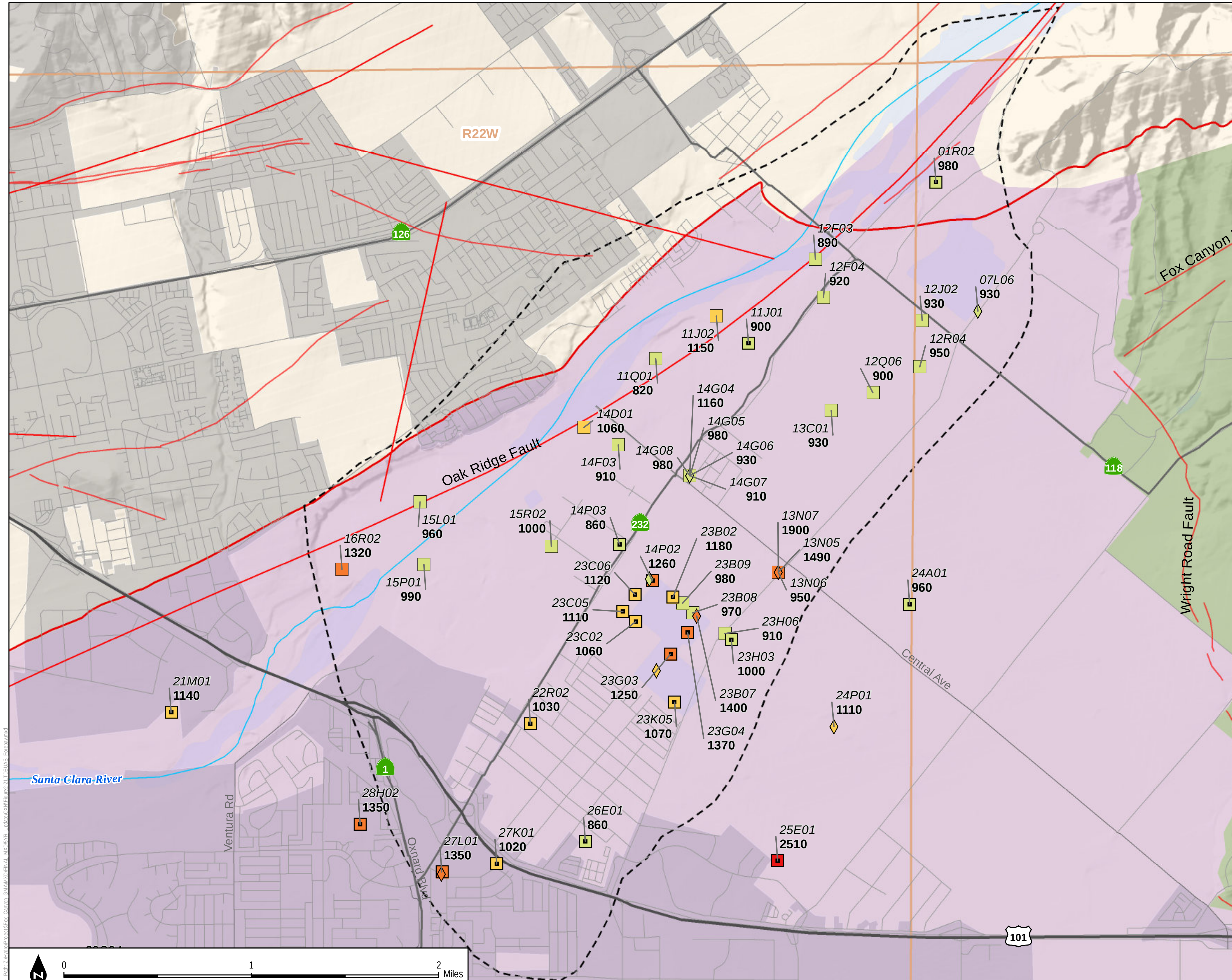

Legend

Fox Canyon Groundwater Management Agency Boundary (FCGMA 2016)

Major Rivers/Stream Channels

Township (North-South) and Range (East-West)

Faults (Dashed Where Inferred)

Oxnard Forebay

Revised Bulletin 118 Groundwater Basins and Subbasin (DWR 2018)

Las Posas Valley (4-008)

Pleasant Valley (4-006)

Oxnard (4-004.02)

TDS concentration (mg/L), 2019-2023

290 - 500

>500 - 750

>750 - 1000

>1000 - 1200

>1200 - 2500

>2500 - 49800

Aquifer designation

Well screened in the Oxnard aquifer

Well screened in the Mugu aquifer

Wells screened in multiple aquifers in the UAS

15P01 Abbreviated State Well Number (see notes)

10.5 Concentration (mg/L)

Notes:
1) Well labels consist of an italicized abbreviated State Well Number (SWN) and a concentration value beneath it.The concentration is the most recent concentration measured in water quality samples collected at that well in the five years from 2019-2023.
2) SWNs are based on Township and Range in the Public Land Survey System. To construct a full SWN from the abbreviation shown on the map,concatenate the Township, Range, abbreviation, and the letter "S". Example: the SWN for the well labeled "15L01" located in Township 02N (T02N) and Range 22W (R22W) is 02N22W15L01S.
3) The shape of each well symbol correspondsto the aquifer(s) in which it is screened (see above).
4) The color of each well symbol corresponds to the most recent concentration measured in a water quality sample from that well.
5) All concentrations are in mg/L.
6) Aquifer designation information for individual wells was provided by FCGMA, CMWD and UWCD.

DUDEK

SOURCE: DWR, FCGMA, VCWPD, CMWD, UWCD

FIGURE 2-21

Upper Aquifer System, Forebay Area - Most Recent TDS (mg/L) Measured 2019-2023

Groundwater Sustainability Plan for the Oxnard Subbasin: First Periodic Evaluation

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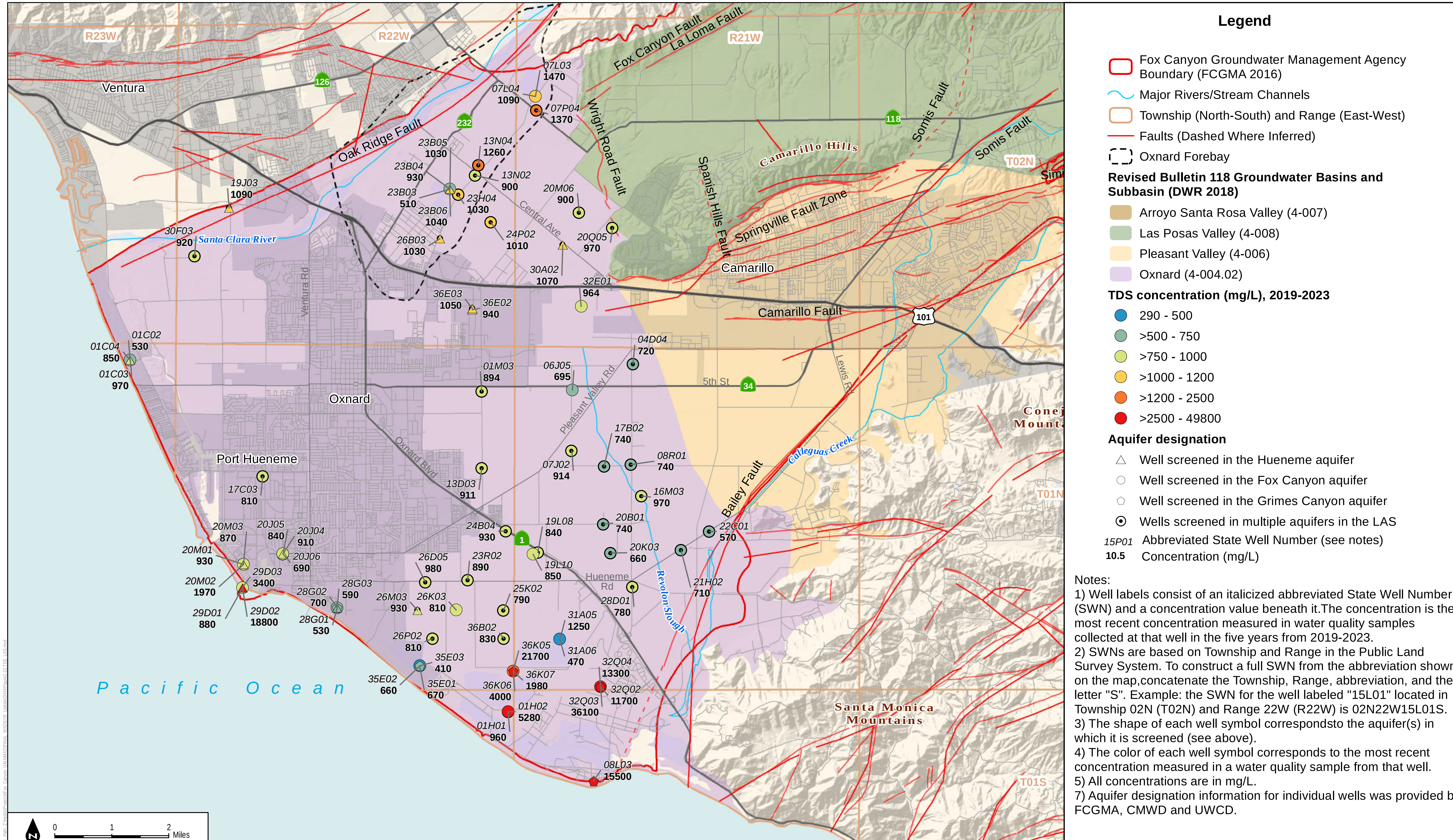

SOURCE: DWR, FCGMA, VCWPD, CMWD, UWCD

DUDEK

FIGURE 2-22

Lower Aquifer System - Most Recent TDS (mg/L) Measured 2019-2023

Groundwater Sustainability Plan for the Oxnard Subbasin: First Periodic Evaluation

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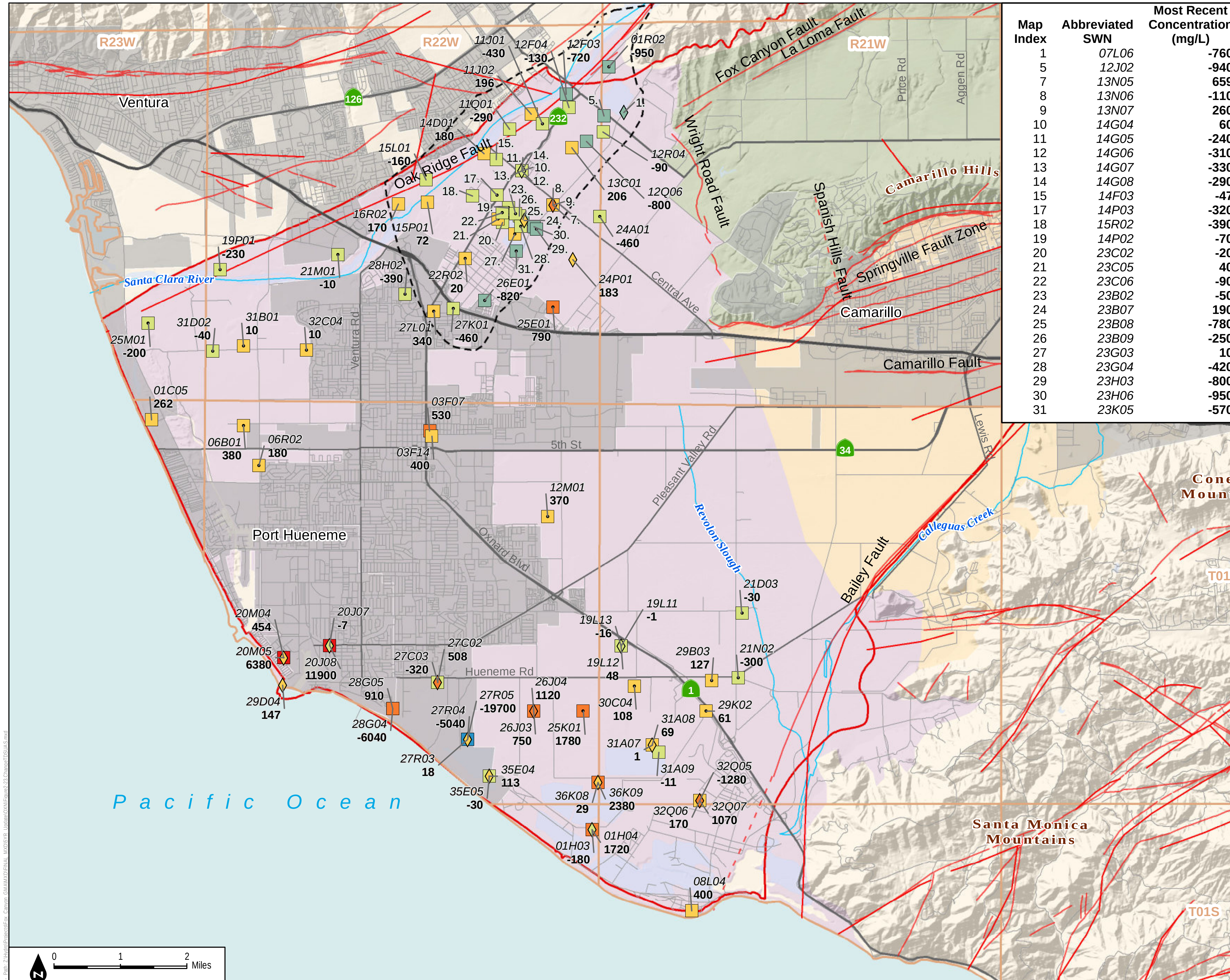

Map Index	Abbreviated SWN	Most Recent Concentration (mg/L)
1	07L06	-760
5	12J02	-940
7	13N05	659
8	13N06	-110
9	13N07	260
10	14G04	60
11	14G05	-240
12	14G06	-310
13	14G07	-330
14	14G08	-290
15	14F03	-47
17	14P03	-320
18	15R02	-390
19	14P02	-70
20	23C02	-20
21	23C05	40
22	23C06	-90
23	23B02	-50
24	23B07	190
25	23B08	-780
26	23B09	-250
27	23G03	10
28	23G04	-420
29	23H03	-800
30	23H06	-950
31	23K05	-570

Legend

- Fox Canyon Groundwater Management Agency Boundary (FCGMA 2016)
- Major Rivers/Stream
- Township (North-South) and Range (East-
- Faults (Dashed Where
- Oxnard Forebay

Revised Bulletin 118 Groundwater Basins and Subbasin (DWR 2018)

- Arroyo Santa Rosa Valley (4-
- Las Posas Valley (4-008)
- Pleasant Valley (4-006)
- Oxnard (4-004.02)

TDS change in concentration (mg/L)

- =< -4000
- -3999 - -500
- -499 - 0
- 1 - 500
- 501 - 4000
- >4000

Aquifer designation

- Well screened in the Oxnard
- Well screened in the Mugu
- Wells screened in multiple aquifers in the UAS

15P01 Abbreviated State Well Number (see notes)
10.5 Change in Concentration (mg/L)

Notes:
1) Well labels consist of an italicized abbreviated State Well Number (SWN) and change in concentration value beneath it. The change in concentration represents the difference between the 2011-2015 and 2019-2023 most recent concentrations. Maps of the 2011-2015 most recent concentration are included in the GSP.
2) SWNs are based on Township and Range in the Public Land Survey System. To construct a full SWN from the abbreviation shown on the map,concatenate the Township, Range, abbreviation, and the letter "S". Example: the SWN for the well labeled "15L01" located in Township 02N (T02N) and Range 22W (R22W) is 02N22W15L01S.
3) The shape of each well symbol correspondsto the aquifer(s) in which it is screened (see above).
4) The color of each well symbol represents the change in groundwater quality measured since the 2011 to 2015 period.
5) All change in concentrations are in mg/L.
6) Aquifer designation information for individual wells was provided by FCGMA, CMWD and UWCD.
7) Negative (-) values represent a decrease in concentration. Positive (+) values represent an increase in concentration.

SOURCE: DWR, FCGMA, VCWPD, CMWD, UWCD

DUDEK

FIGURE 2-23
Change in TDS Concentration (mg/L) in the UAS between 2011-2015 and 2019-2023

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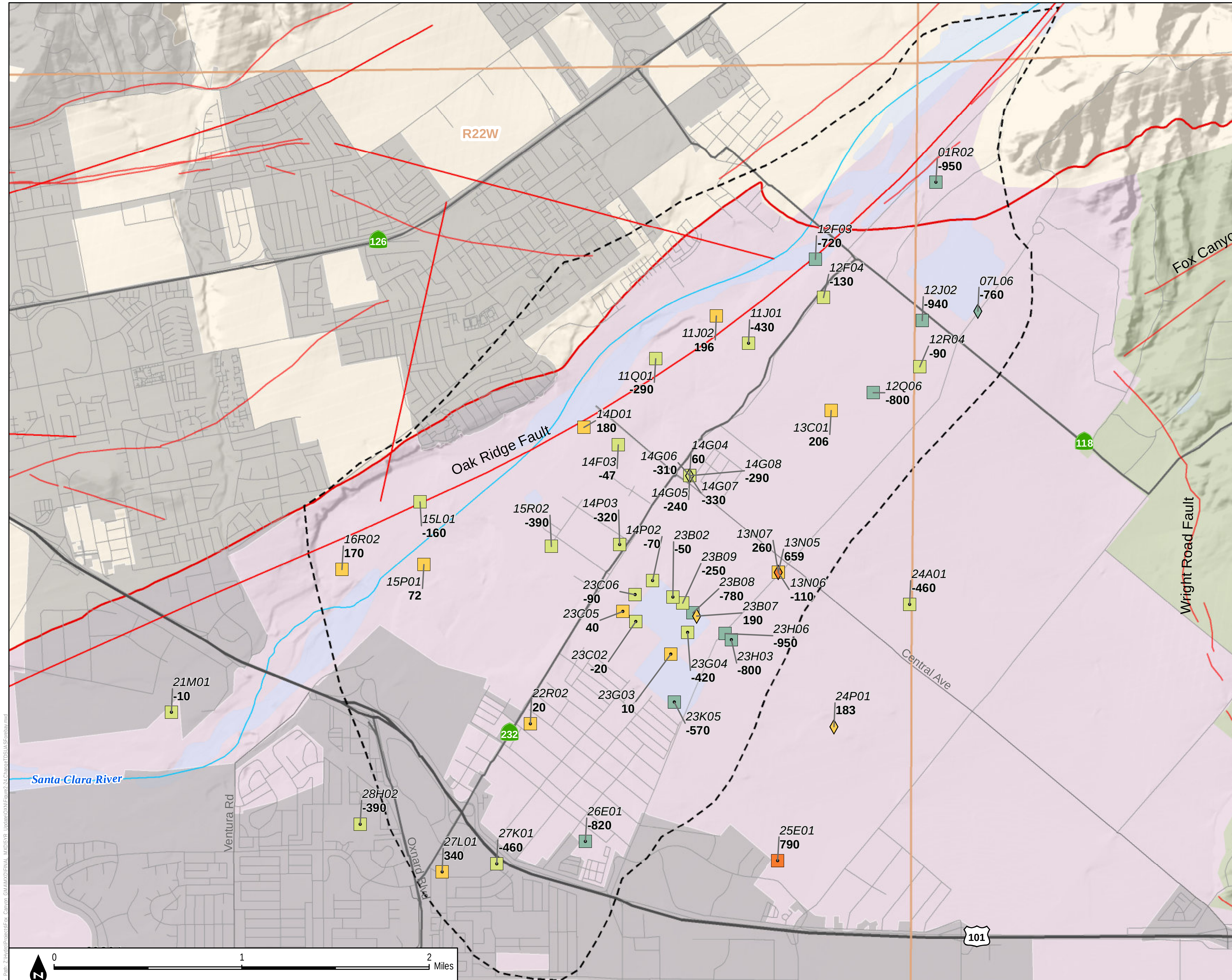

Legend

Fox Canyon Groundwater Management Agency Boundary (FCGMA 2016)
Major Rivers/Stream Channels
Township (North-South) and Range (East-West)
Faults (Dashed Where Inferred)
Oxnard Forebay

Revised Bulletin 118 Groundwater Basins and Subbasin (DWR 2018)

Las Posas Valley (4-008)
Pleasant Valley (4-006)
Oxnard (4-004.02)

TDS change in concentration (mg/L)

=< -4000
-3999 - -500
-499 - 0
1 - 500
501 - 4000
>4000

Aquifer designation

Well screened in the Oxnard aquifer
Well screened in the Mugu aquifer
Wells screened in multiple aquifers in the UAS
15P01 Abbreviated State Well Number (see notes)
10.5 Change in Concentration (mg/L)

Notes:
1) Well labels consist of an italicized abbreviated State Well Number (SWN) and change in concentration value beneath it. The change in concentration represents the difference between the 2011-2015 and 2019-2023 most recent concentrations. Maps of the 2011-2015 most recent concentration are included in the GSP.
2) SWNs are based on Township and Range in the Public Land Survey System. To construct a full SWN from the abbreviation shown on the map,concatenate the Township, Range, abbreviation, and the letter "S". Example: the SWN for the well labeled "15L01" located in Township 02N (T02N) and Range 22W (R22W) is 02N22W15L01S.
3) The shape of each well symbol correspondsto the aquifer(s) in which it is screened (see above).
4) The color of each well symbol represents the change in groundwater quality measured since the 2011 to 2015 period.
5) All change in concentrations are in mg/L.
6) Aquifer designation information for individual wells was provided by FCGMA, CMWD and UWCD.
7) Negative (-) values represent a decrease in concentration. Positive (+) values represent an increase in concentration.

DUDEK

SOURCE: DWR, FCGMA, VCWPD, CMWD, UWCD

FIGURE 2-24

Change in TDS Concentration (mg/L) in the UAS, Forebay Area, between 2011-2015 and 2019-2023

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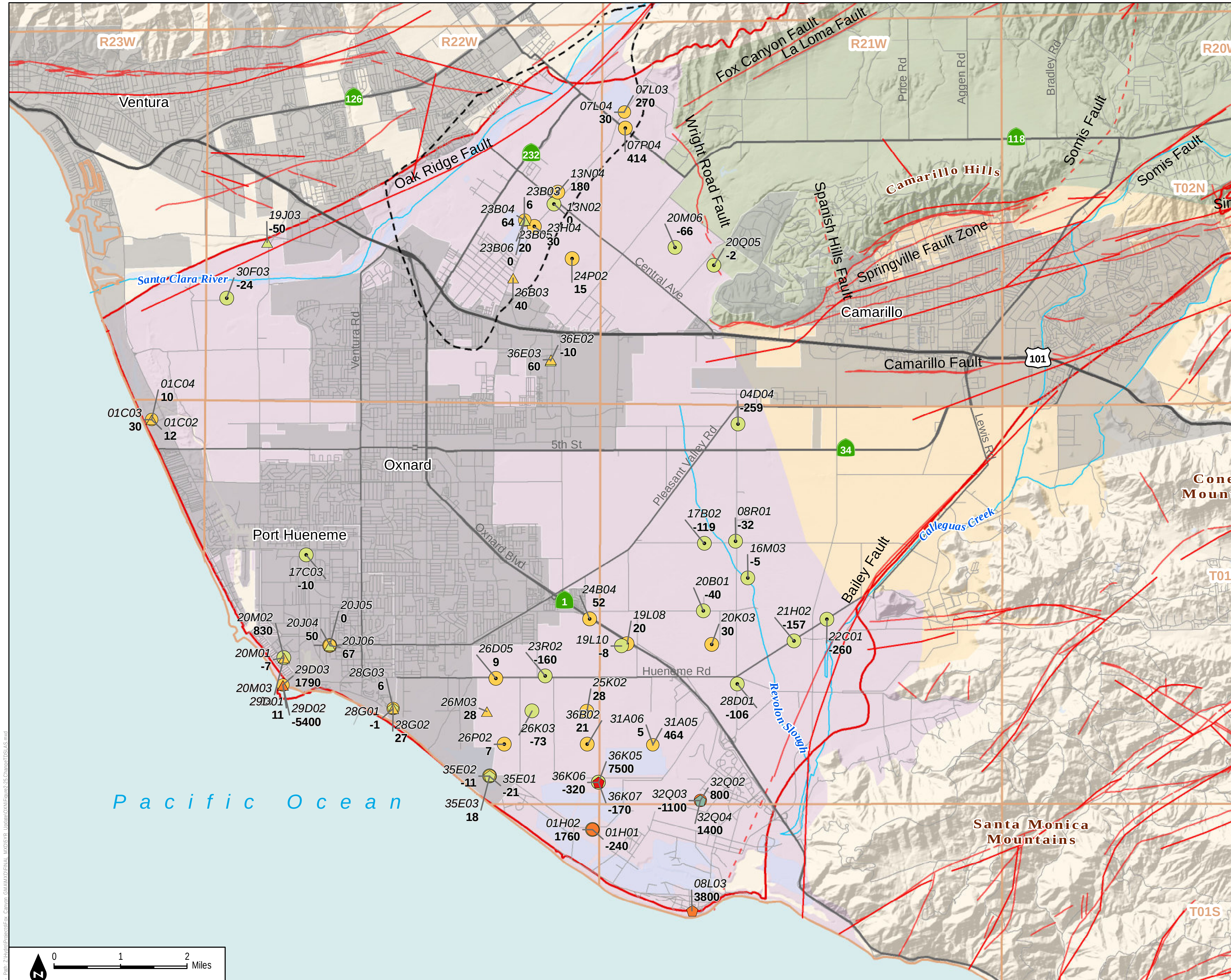

Legend

- Fox Canyon Groundwater Management Agency Boundary (FCGMA 2016)
- Major Rivers/Stream Channels
- Township (North-South) and Range (East-
- Faults (Dashed Where Inferred)
- Oxnard Forebay

Revised Bulletin 118 Groundwater Basins and Subbasin (DWR 2018)

- Arroyo Santa Rosa Valley (4-
- Las Posas Valley (4-008)
- Pleasant Valley (4-006)
- Oxnard (4-004.02)

TDS change in concentration (mg/L)

- =< -4000
- -3999 - -500
- -499 - 0
- 1 - 500
- 501 - 4000
- >4000

Aquifer designation

- Well screened in the Hueneme
- Well screened in the Fox Canyon
- Well screened in the Grimes Canyon
- Wells screened in multiple aquifers in the LAS

15P01 Abbreviated State Well Number (see notes)
10.5 Change in Concentration (mg/L)

Notes:
1) Well labels consist of an italicized abbreviated State Well Number (SWN) and change in concentration value beneath it.
The change in concentration represents the difference between the 2011-2015 and 2019-2023 most recent concentrations.
Maps of the 2011-2015 most recent concentration are included in the GSP.
2) SWNs are based on Township and Range in the Public Land Survey System. To construct a full SWN from the abbreviation shown on the map,concatenate the Township, Range, abbreviation, and the letter "S". Example: the SWN for the well labeled "15L01" located in Township 02N (T02N) and Range 22W (R22W) is 02N22W15L01S.
3) The shape of each well symbol correspondsto the aquifer(s) in which it is screened (see above).
4) The color of each well symbol represents the change in groundwater quality measured since the 2011 to 2015 period.
5) All change in concentrations are in mg/L.
6) Aquifer designation information for individual wells was provided by FCGMA, CMWD and UWCD.
7) Negative (-) values represent a decrease in concentration. Positive (+) values represent an increase in concentration.

SOURCE: DWR, FCGMA, VCWPD, CMWD, UWCD

DUDEK

FIGURE 2-25

Change in TDS Concentration (mg/L) in the LAS between 2011-2015 and 2019-2023

Groundwater Sustainability Plan for the Oxnard Subbasin: First Periodic Evaluation

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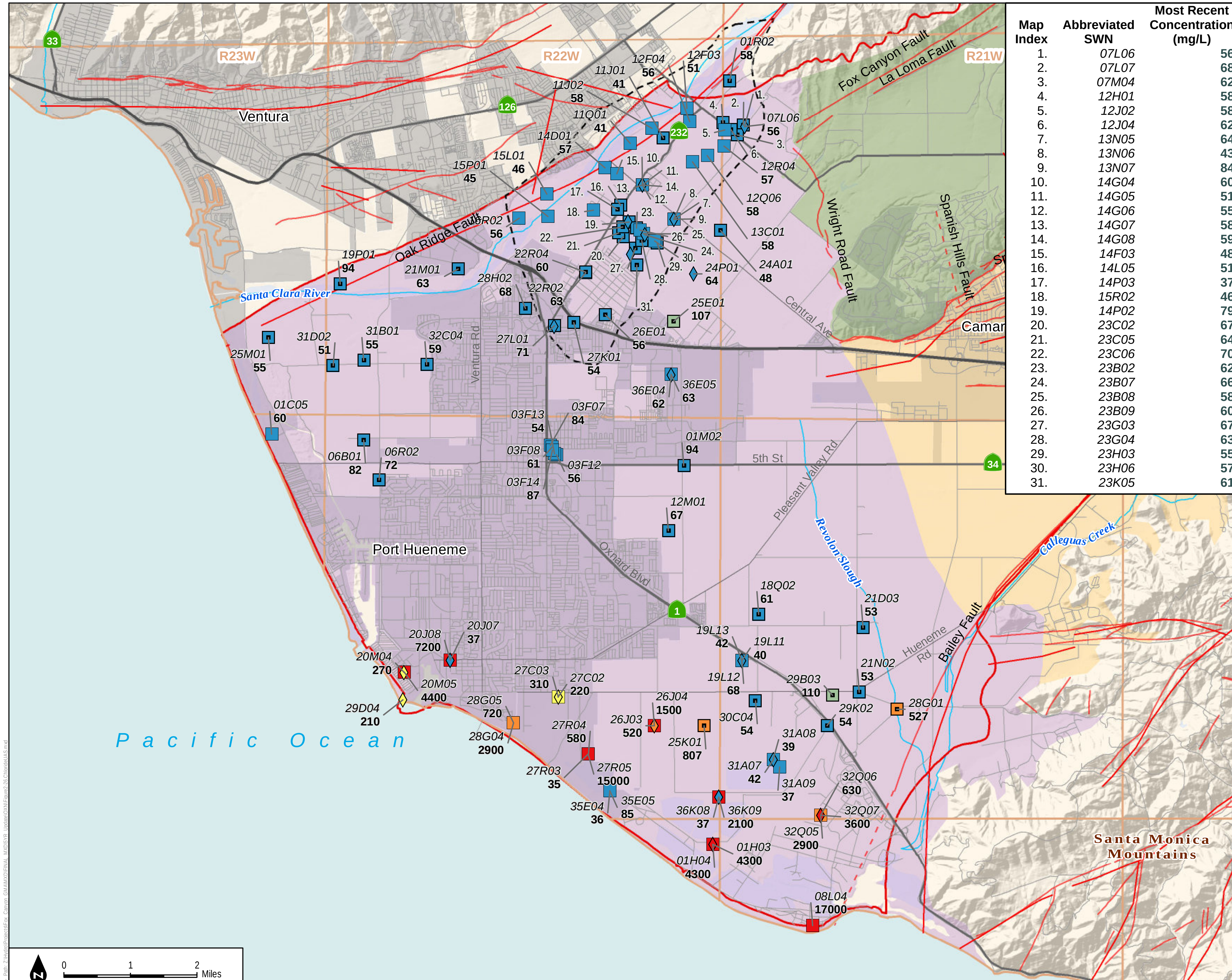

Map Index	Abbreviated SWN	Most Recent Concentration (mg/L)
1.	07L06	56
2.	07L07	68
3.	07M04	62
4.	12H01	58
5.	12J02	58
6.	12J04	62
7.	13N05	64
8.	13N06	43
9.	13N07	84
10.	14G04	60
11.	14G05	51
12.	14G06	55
13.	14G07	58
14.	14G08	59
15.	14F03	48
16.	14L05	51
17.	14P03	37
18.	15R02	46
19.	14P02	79
20.	23C02	67
21.	23C05	64
22.	23C06	70
23.	23B02	62
24.	23B07	66
25.	23B08	58
26.	23B09	60
27.	23G03	67
28.	23G04	63
29.	23H03	55
30.	23H06	57
31.	23K05	61

Legend

- Fox Canyon Groundwater Management Agency Boundary (FCGMA 2016)
- Major Rivers/Stream Channels
- Township (North-South) and Range (East-West)
- Faults (Dashed Where Inferred)
- Oxnard Forebay

Revised Bulletin 118 Groundwater Basins and Subbasin (DWR 2018)

- Arroyo Santa Rosa Valley (4-007)
- Las Posas Valley (4-008)
- Pleasant Valley (4-006)
- Oxnard (4-004.02)

Chloride concentration (mg/L), 2019-2023

- 23 - 100
- 101 - 200
- 201 - 500
- 501 - 1000
- 1001 - 22500

Aquifer designation

- Well screened in the Oxnard aquifer
- Well screened in the Mugu aquifer
- Wells screened in multiple aquifers in the UAS

15P01 Abbreviated State Well Number (see notes)
10.5 Concentration (mg/L)

Notes:
1) Well labels consist of an italicized abbreviated State Well Number (SWN) and a concentration value beneath it.The concentration is the most recent concentration measured in water quality samples collected at that well in the five years from 2019-2023.
2) SWNs are based on Township and Range in the Public Land Survey System. To construct a full SWN from the abbreviation shown on the map,concatenate the Township, Range, abbreviation, and the letter "S". Example: the SWN for the well labeled "15L01" located in Township 02N (T02N) and Range 22W (R22W) is 02N22W15L01S.
3) The shape of each well symbol correspondsto the aquifer(s) in which it is screened (see above).
4) The color of each well symbol corresponds to the most recent concentration measured in a water quality sample from that well.
5) All concentrations are in mg/L.
7) Aquifer designation information for individual wells was provided by FCGMA, CMWD and UWCD.

SOURCE: DWR, FCGMA, VCWPD, CMWD, UWCD

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FIGURE 2-26
Upper Aquifer System - Most Recent Chloride (mg/L) Measured 2019-2023

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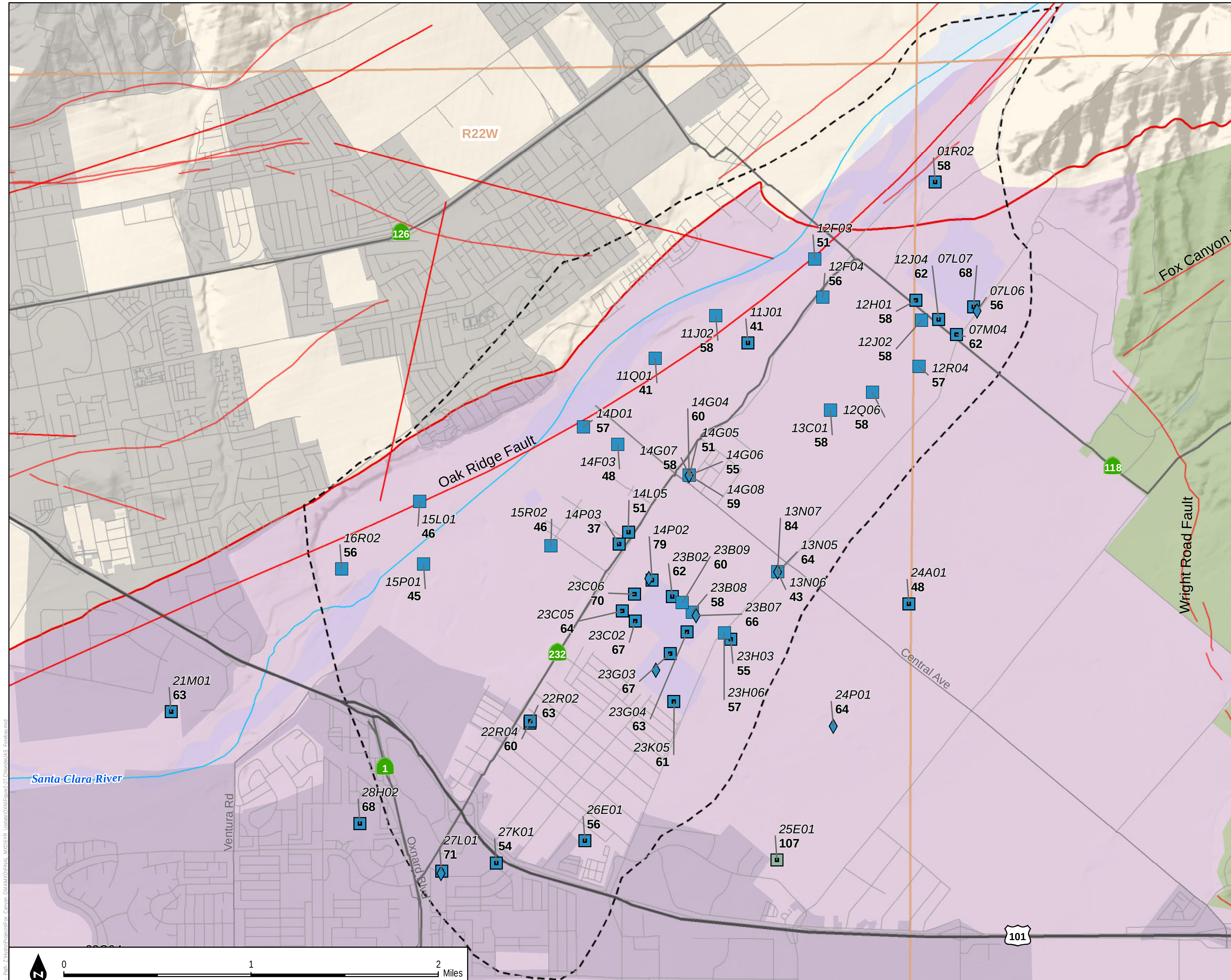

Legend

- Fox Canyon Groundwater Management Agency Boundary (FCGMA 2016)
- Major Rivers/Stream Channels
- Township (North-South) and Range (East-West)
- Faults (Dashed Where Inferred)
- Oxnard Forebay

Revised Bulletin 118 Groundwater Basins and Subbasin (DWR 2018)

- Las Posas Valley (4-008)
- Pleasant Valley (4-006)
- Oxnard (4-004.02)

Chloride concentration (mg/L), 2019-2023

- 23 - 100
- 101 - 150
- 151 - 200
- 201 - 500
- 501 - 1000
- 1001 - 22500

Aquifer designation

- Well screened in the Oxnard aquifer
- Well screened in the Mugu aquifer
- Wells screened in multiple aquifers in the UAS

15P01 Abbreviated State Well Number (see notes)
10.5 Concentration (mg/L)

Notes:
1) Well labels consist of an italicized abbreviated State Well Number (SWN) and a concentration value beneath it.The concentration is the most recent concentration measured in water quality samples collected at that well in the five years from 2019-2023.
2) SWNs are based on Township and Range in the Public Land Survey System. To construct a full SWN from the abbreviation shown on the map,concatenate the Township, Range, abbreviation, and the letter "S". Example: the SWN for the well labeled "15L01" located in Township 02N (T02N) and Range 22W (R22W) is 02N22W15L01S.
3) The shape of each well symbol correspondsto the aquifer(s) in which it is screened (see above).
4) The color of each well symbol corresponds to the most recent concentration measured in a water quality sample from that well.
5) All concentrations are in mg/L.
7) Aquifer designation information for individual wells was provided by FCGMA, CMWD and UWCD.

SOURCE: DWR, FCGMA, VCWPD, CMWD, UWCD

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FIGURE 2-27

Upper Aquifer System, Forebay Area - Most Recent Chloride (mg/L) Measured 2019-2023

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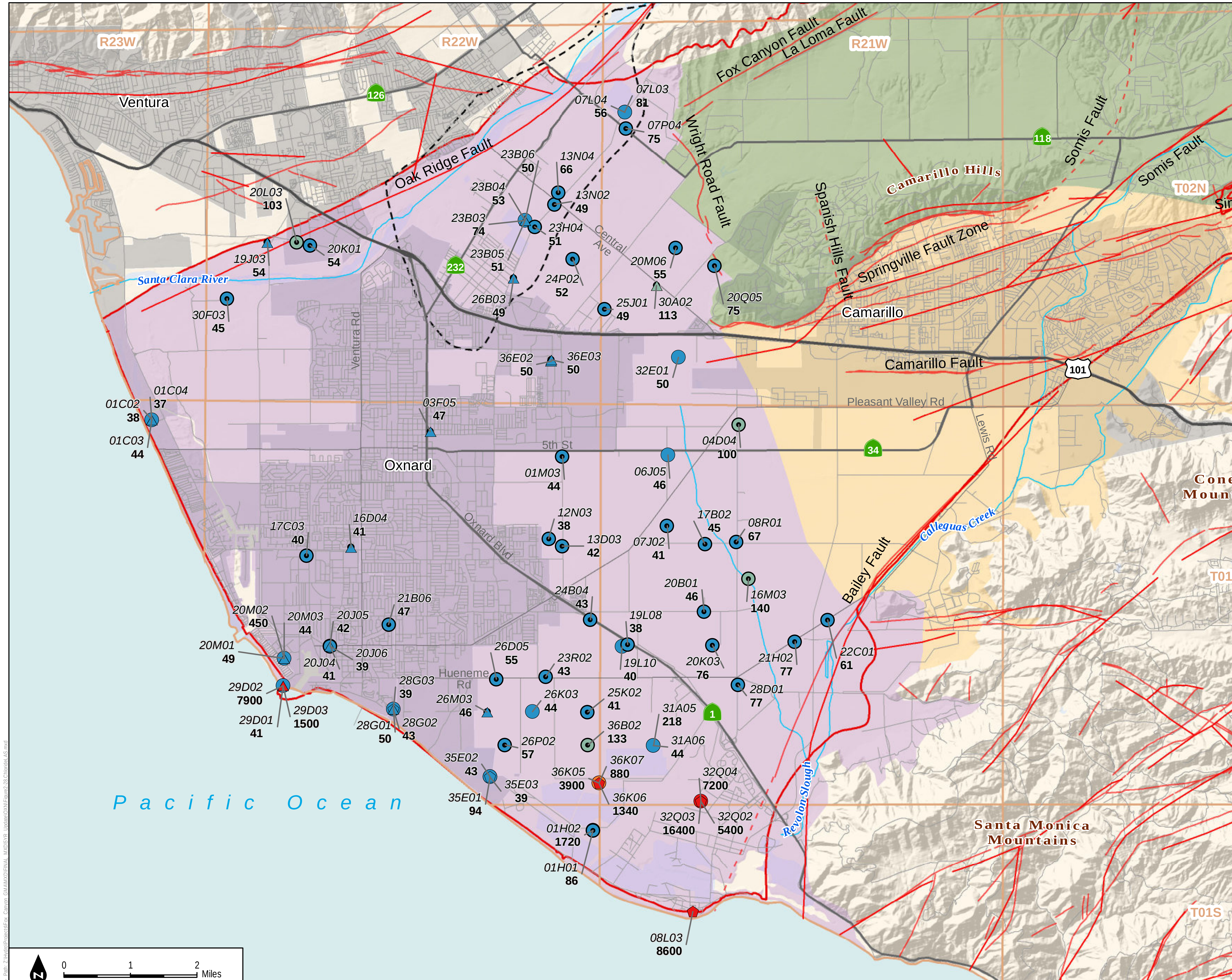

Legend

- Fox Canyon Groundwater Management Agency Boundary (FCGMA 2016)
- Major Rivers/Stream Channels
- Township (North-South) and Range (East-West)
- Faults (Dashed Where Inferred)
- Oxnard Forebay

Revised Bulletin 118 Groundwater Basins and Subbasins (DWR 2018)

- Arroyo Santa Rosa Valley (4-007)
- Las Posas Valley (4-008)
- Pleasant Valley (4-006)
- Oxnard (4-004.02)

Chloride concentration (mg/L), 2019-2023

- 23 - 100
- 101 - 150
- 151 - 200
- 201 - 500
- 501 - 1000
- 1001 - 22500

Aquifer designation

- Well screened in the Hueneme aquifer
- Well screened in the Fox Canyon aquifer
- Well screened in the Grimes Canyon aquifer
- Wells screened in multiple aquifers in the LAS

15P01 Abbreviated State Well Number (see notes)
10.5 Concentration (mg/L)

Notes:
1) Well labels consist of an italicized abbreviated State Well Number (SWN) and a concentration value beneath it.The concentration is the most recent concentration measured in water quality samples collected at that well in the five years from 2019-2023.
2) SWNs are based on Township and Range in the Public Land Survey System. To construct a full SWN from the abbreviation shown on the map,concatenate the Township, Range, abbreviation, and the letter "S". Example: the SWN for the well labeled "15L01" located in Township 02N (T02N) and Range 22W (R22W) is 02N22W15L01S.
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4) The color of each well symbol corresponds to the most recent concentration measured in a water quality sample from that well.
5) All concentrations are in mg/L.
7) Aquifer designation information for individual wells was provided by FCGMA, CMWD and UWCD.

SOURCE: DWR, FCGMA, VCWPD, CMWD, UWCD

FIGURE 2-28

Lower Aquifer System - Most Recent Chloride (mg/L) Measured 2019-2023

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Groundwater Sustainability Plan for the Oxnard Subbasin: First Periodic Evaluation

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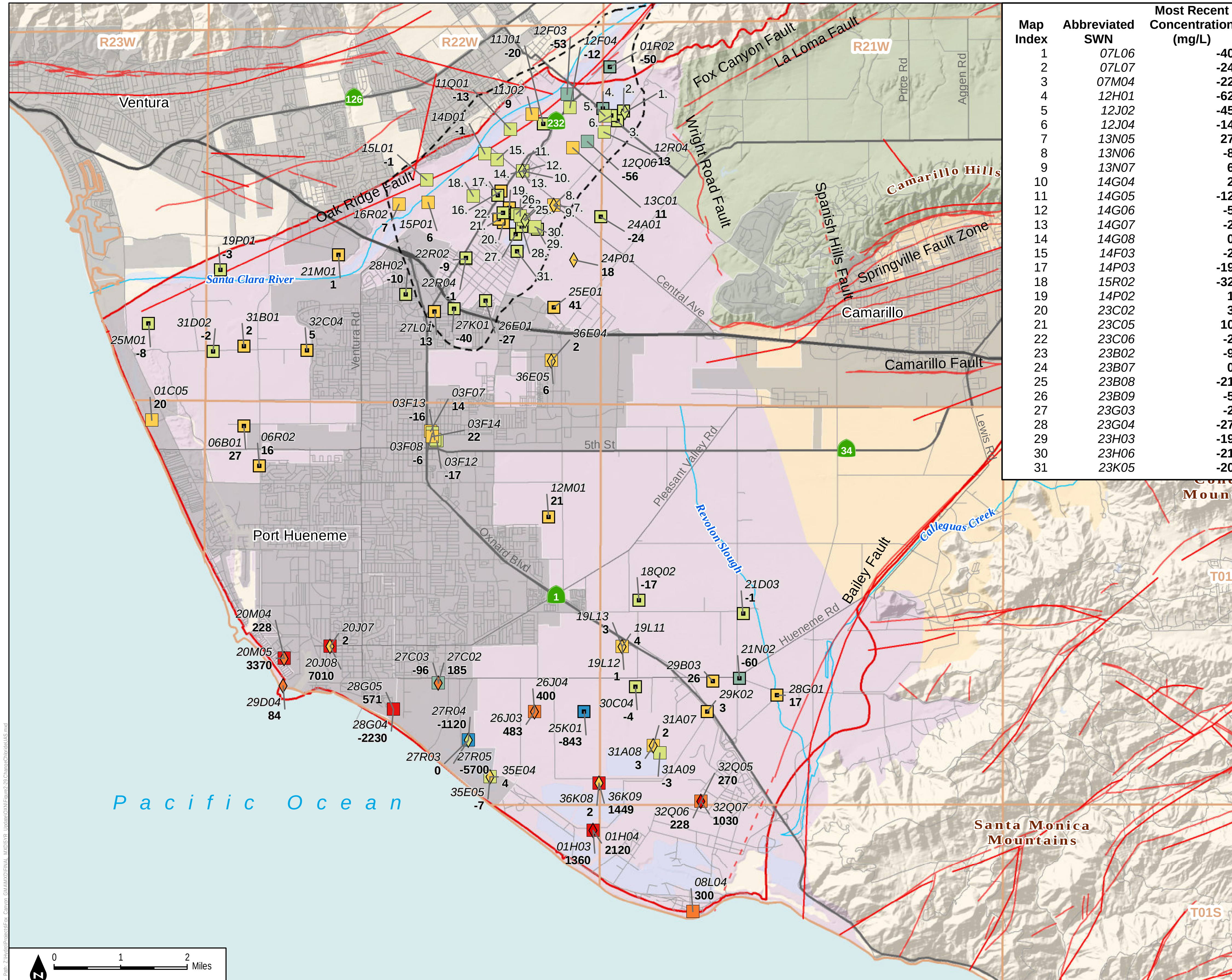

Map Index	Abbreviated SWN	Most Recent Concentration (mg/L)
1	07L06	-40
2	07L07	-24
3	07M04	-22
4	12H01	-62
5	12J02	-45
6	12J04	-14
7	13N05	27
8	13N06	-8
9	13N07	6
10	14G04	2
11	14G05	-12
12	14G06	-5
13	14G07	-2
14	14G08	0
15	14F03	-2
17	14P03	-19
18	15R02	-32
19	14P02	1
20	23C02	3
21	23C05	10
22	23C06	-2
23	23B02	-9
24	23B07	0
25	23B08	-21
26	23B09	-5
27	23G03	-2
28	23G04	-27
29	23H03	-19
30	23H06	-21
31	23K05	-20

Legend

- Fox Canyon Groundwater Management Agency Boundary (FCGMA 2016)
- Major Rivers/Stream Channels
- Township (North-South) and Range (East-West)
- Faults (Dashed Where Inferred)
- Oxnard Forebay

Revised Bulletin 118 Groundwater Basins and Subbasin (DWR 2018)

- Arroyo Santa Rosa Valley (4-007)
- Las Posas Valley (4-008)
- Pleasant Valley (4-006)
- Oxnard (4-004.02)

Chloride change in concentration (mg/L)

- =< -100
- > -100 - -50
- > -50 - 0
- >0 - 50
- >50 - 500
- >500

Aquifer designation

- Well screened in the Oxnard aquifer
- Well screened in the Mugu aquifer
- Wells screened in multiple aquifers in the UAS

15P01 Abbreviated State Well Number (see notes)
10.5 Change in Concentration (mg/L)

Notes:
1) Well labels consist of an italicized abbreviated State Well Number (SWN) and change in concentration value beneath it.
The change in concentration represents the difference between the 2011-2015 and 2019-2023 most recent concentrations.
Maps of the 2011-2015 most recent concentration are included in the GSP.
2) SWNs are based on Township and Range in the Public Land Survey System. To construct a full SWN from the abbreviation shown on the map,concatenate the Township, Range, abbreviation, and the letter "S". Example: the SWN for the well labeled "15L01" located in Township 02N (T02N) and Range 22W (R22W) is 02N22W15L01S.
3) The shape of each well symbol correspondsto the aquifer(s) in which it is screened (see above).
4) The color of each well symbol represents the change in groundwater quality measured since the 2011 to 2015 period.
5) All change in concentrations are in mg/L.
6) Aquifer designation information for individual wells was provided by FCGMA, CMWD and UWCD.
7) Negative (-) values represent a decrease in concentration. Positive (+) values represent an increase in concentration.

SOURCE: DWR, FCGMA, VCWPD, CMWD, UWCD

DUDEK

FIGURE 2-29

Change in Chloride Concentration (mg/L) in the UAS between 2011-2015 and 2019-2023

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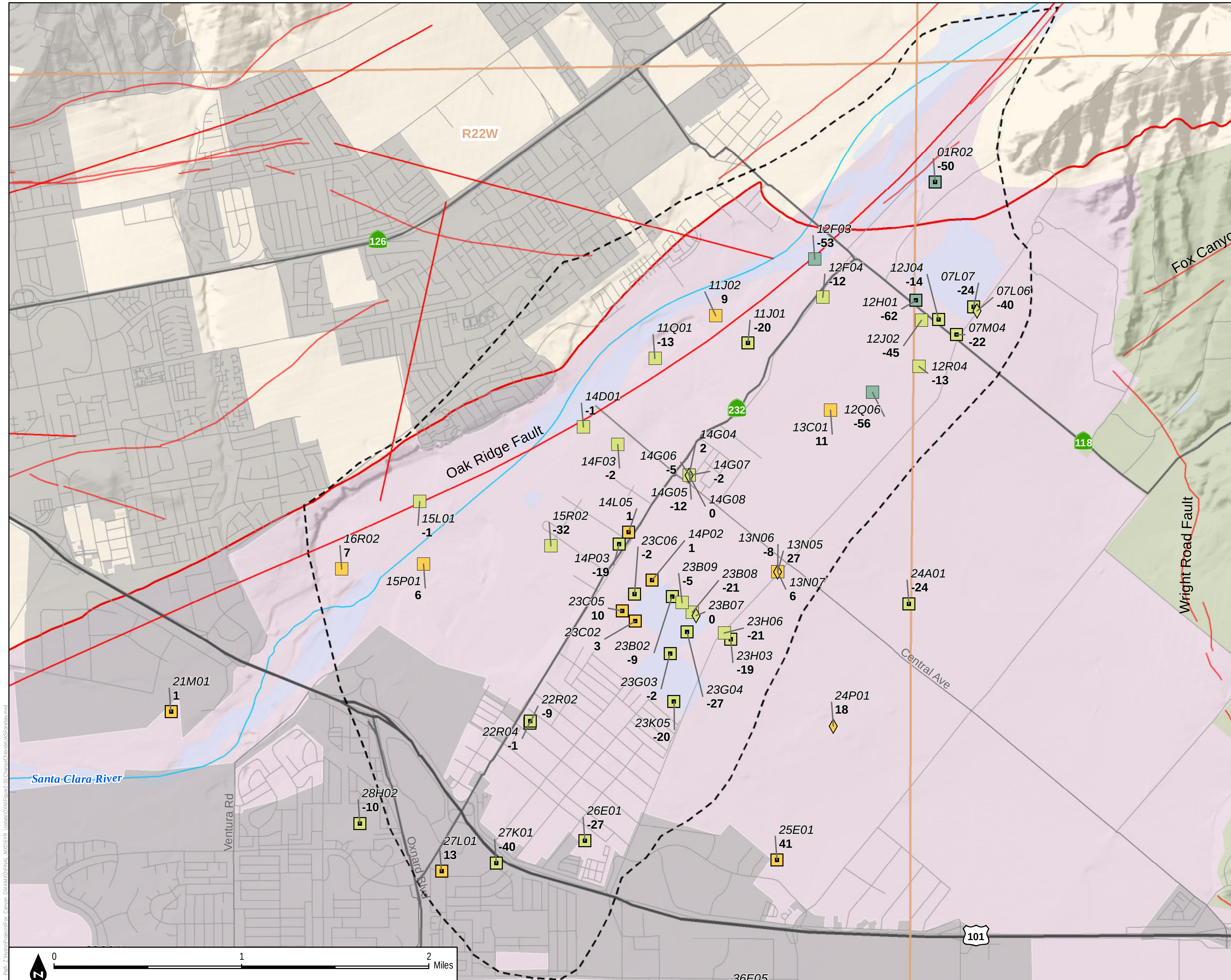

Legend

Fox Canyon Groundwater Management Agency Boundary (FCGMA 2016)

Major Rivers/Stream Channels

Township (North-South) and Range (East-West)

Faults (Dashed Where Inferred)

Oxnard Forebay

Revised Bulletin 118 Groundwater Basins and Subbasin (DWR 2018)

Las Posas Valley (4-008)

Pleasant Valley (4-006)

Oxnard (4-004.02)

Chloride change in concentration (mg/L)

=< -100

-99 - -50

-49 - 0

1 - 50

51 - 100

>100

Aquifer designation

Well screened in the Oxnard aquifer

Well screened in the Mugu aquifer

Wells screened in multiple aquifers in the UAS

15P01 Abbreviated State Well Number (see notes)

10.5 Change in Concentration (mg/L)

Notes:

1) Well labels consist of an italicized abbreviated State Well Number (SWN) and change in concentration value beneath it.

The change in concentration represents the difference between the 2011-2015 and 2019-2023 most recent concentrations.

Maps of the 2011-2015 most recent concentration are included in the GSP.

2) SWNs are based on Township and Range in the Public Land Survey System. To construct a full SWN from the abbreviation shown on the map,concatenate the Township, Range, abbreviation, and the letter "S". Example: the SWN for the well labeled "15L01" located in Township 02N (T02N) and Range 22W (R22W) is 02N22W15L01S.

3) The shape of each well symbol correspondsto the aquifer(s) in which it is screened (see above).

4) The color of each well symbol represents the change in groundwater quality measured since the 2011 to 2015 period.

5) All change in concentrations are in mg/L.

6) Aquifer designation information for individual wells was provided by FCGMA, CMWD and UWCD.

7) Negative (-) values represent a decrease in concentration. Positive (+) values represent an increase in concentration.

DUDEK

SOURCE: DWR, FCGMA, VCWPD, CMWD, UWCD

FIGURE 2-30

Change in Chloride Concentration (mg/L) in the UAS, Forebay Area, between 2011-2015 and 2019-2023

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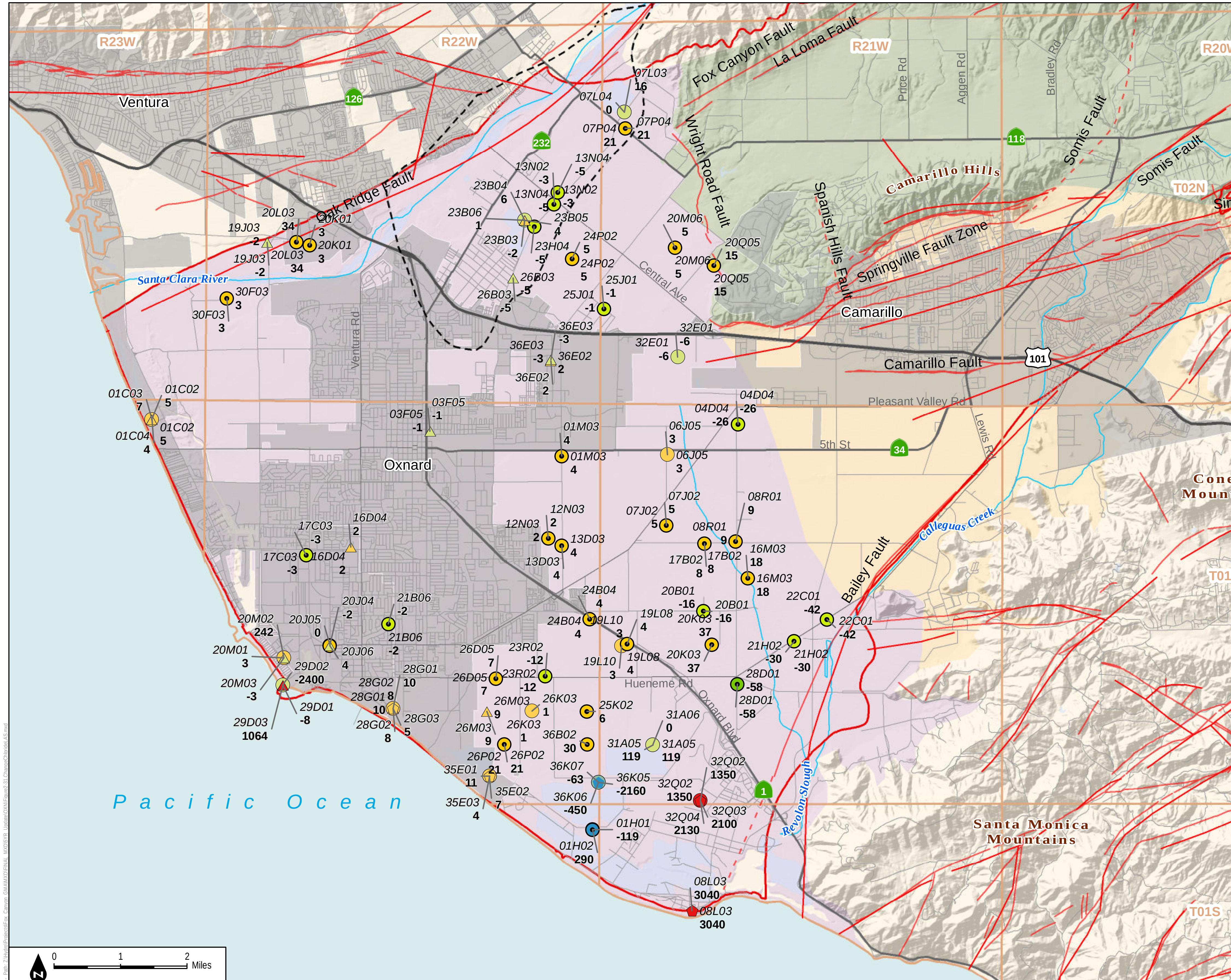

Legend

Fox Canyon Groundwater Management Agency Boundary (FCGMA 2016)

Major Rivers/Stream Channels

Township (North-South) and Range (East-West)

Faults (Dashed Where Inferred)

Oxnard Forebay

Revised Bulletin 118 Groundwater Basins and Subbasin (DWR 2018)

Arroyo Santa Rosa Valley (4-007)

Las Posas Valley (4-008)

Pleasant Valley (4-006)

Oxnard (4-004.02)

Chloride change in concentration (mg/L)

=< -100

> -100 - -50

> -50 - 0

>0 - 50

>50 - 500

>500

Aquifer designation

Well screened in the Hueneme aquifer

Well screened in the Fox Canyon aquifer

Well screened in the Grimes Canyon aquifer

Wells screened in multiple aquifers in the LAS

15P01 Abbreviated State Well Number (see notes)

10.5 Change in Concentration (mg/L)

Notes:
1) Well labels consist of an italicized abbreviated State Well Number (SWN) and change in concentration value beneath it.
The change in concentration represents the difference between the 2011-2015 and 2019-2023 most recent concentrations.
Maps of the 2011-2015 most recent concentration are included in the GSP.
2) SWNs are based on Township and Range in the Public Land Survey System. To construct a full SWN from the abbreviation shown on the map,concatenate the Township, Range, abbreviation, and the letter "S". Example: the SWN for the well labeled "15L01" located in Township 02N (T02N) and Range 22W (R22W) is 02N22W15L01S.
3) The shape of each well symbol correspondsto the aquifer(s) in which it is screened (see above).
4) The color of each well symbol represents the change in groundwater quality measured since the 2011 to 2015 period.
5) All change in concentrations are in mg/L.
6) Aquifer designation information for individual wells was provided by FCGMA, CMWD and UWCD.
7) Negative (-) values represent a decrease in concentration.
Positive (+) values represent an increase in concentration.

SOURCE: DWR, FCGMA, VCWPD, CMWD, UWCD

DUDEK

FIGURE 2-31

Change in Chloride Concentration (mg/L) in the LAS between 2011-2015 and 2019-2023

Groundwater Sustainability Plan for the Oxnard Subbasin: First Periodic Evaluation

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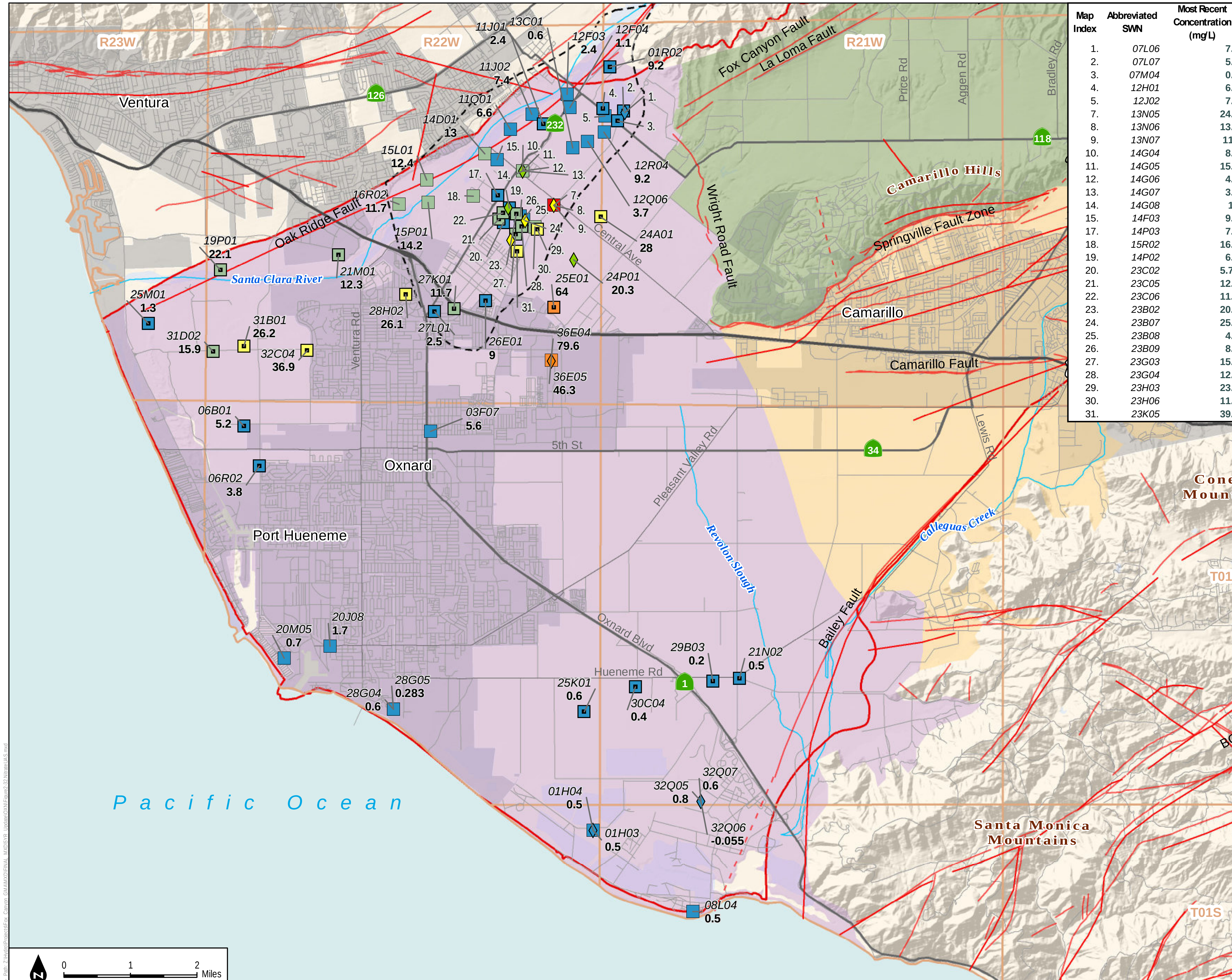
FIGURE 2-32

Upper Aquifer System - Most Recent Nitrate (mg/L) Measured 2019-2023



Map Index	Abbreviated SWN	Most Recent Concentration (mg/L)
1.	*07L06*	7.6
2.	*07L07*	5.6
3.	*07M04*	0.4
4.	*12H01*	6.2
5.	*12J02*	7.6
7.	*13N05*	24.8
8.	*13N06*	13.8
9.	*13N07*	115
10.	*14G04*	8.4
11.	*14G05*	15.7
12.	*14G06*	4.8
13.	*14G07*	3.8
14.	*14G08*	13
15.	*14F03*	9.8
17.	*14P03*	7.7
18.	*15R02*	16.3
19.	*14P02*	6.2
20.	*23C02*	5.76
21.	*23C05*	12.4
22.	*23C06*	11.5
23.	*23B02*	20.8
24.	*23B07*	25.9
25.	*23B08*	4.6
26.	*23B09*	8.5
27.	*23G03*	15.1
28.	*23G04*	12.4
29.	*23H03*	23.5
30.	*23H06*	11.4
31.	*23K05*	39.4

Legend

- Fox Canyon Groundwater Management Agency Boundary (FCGMA 2016)
- Major Rivers/Stream Channels
- Township (North-South) and Range (East-West)
- Faults (Dashed Where Inferred)
- Oxnard Forebay

Revised Bulletin 118 Groundwater Basins and Subbasin (DWR 2018)

- Arroyo Santa Rosa Valley (4-007)
- Las Posas Valley (4-008)
- Pleasant Valley (4-006)
- Oxnard (4-004.02)

Nitrate concentration (mg/L as Nitrate), 2019-2023

- 0 - 10
- >10 - 22.5
- >22.5 - 45
- >45 - 90
- >90 - 528

Aquifer designation

- Well screened in the Oxnard aquifer
- Well screened in the Mugu aquifer
- Wells screened in multiple aquifers in the UAS

15P01 Abbreviated State Well Number (see notes)
10.5 Concentration (mg/L)

Notes:
1) Well labels consist of an italicized abbreviated State Well Number (SWN) and a concentration value beneath it.The concentration is the most recent concentration measured in water quality samples collected at that well in the five years from 2019-2023.
2) SWNs are based on Township and Range in the Public Land Survey System. To construct a full SWN from the abbreviation shown on the map,concatenate the Township, Range, abbreviation, and the letter "S". Example: the SWN for the well labeled "15L01" located in Township 02N (T02N) and Range 22W (R22W) is 02N22W15L01S.
3) The shape of each well symbol corresponds to the aquifer(s) in which it is screened (see above).
4) The color of each well symbol corresponds to the most recent concentration measured in a water quality sample from that well.
5) All concentrations are in mg/L.
6) Aquifer designation information for individual wells was provided by FCGMA, CMWD and UWCD.

SOURCE: DWR, FCGMA, VCWPD, CMWD, UWCD

DUDEK

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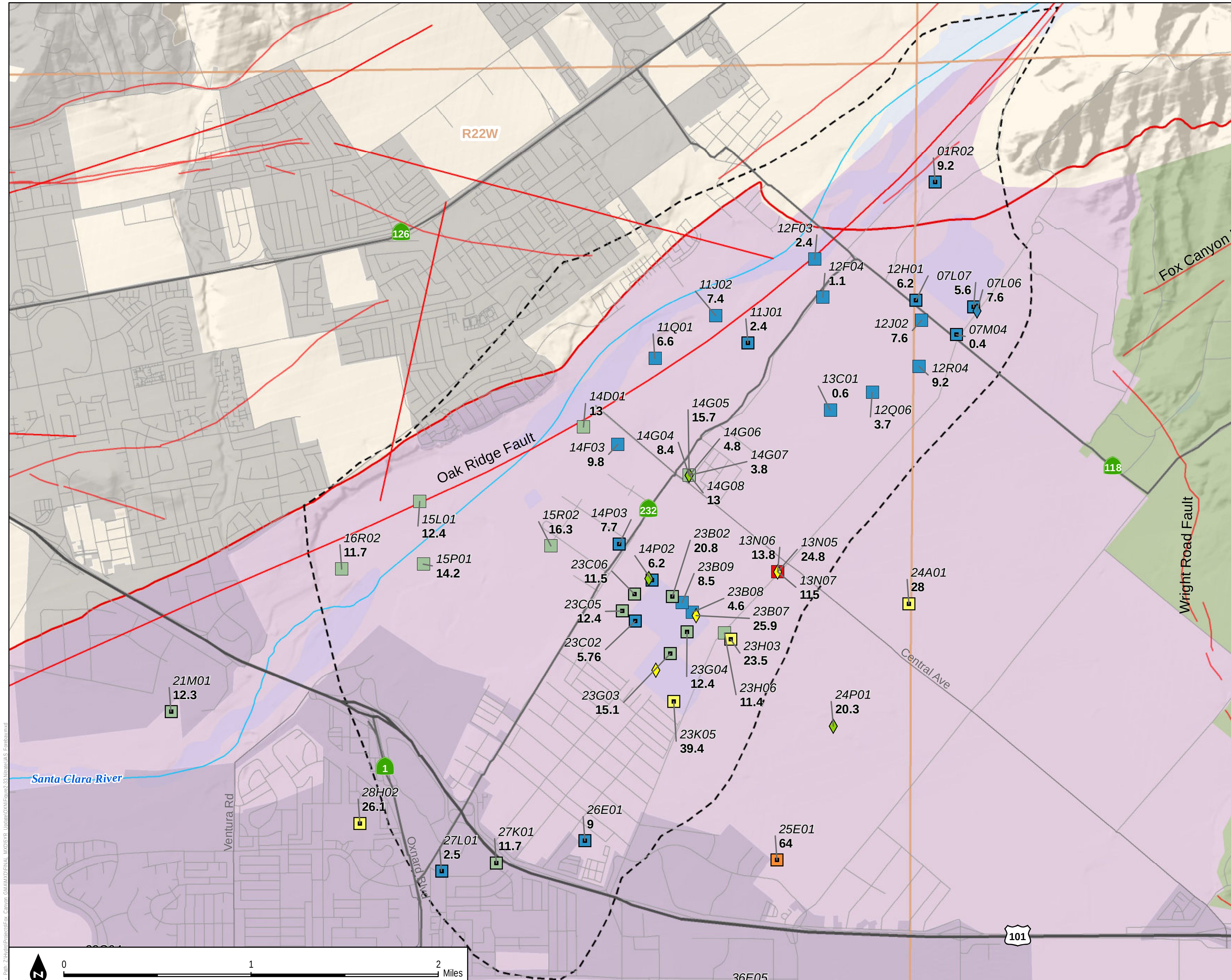

Legend

- Fox Canyon Groundwater Management Agency Boundary (FCGMA 2016)
- Major Rivers/Stream Channels
- Township (North-South) and Range (East-West)
- Faults (Dashed Where Inferred)
- Oxnard Forebay

Revised Bulletin 118 Groundwater Basins and Subbasin (DWR 2018)

- Las Posas Valley (4-008)
- Pleasant Valley (4-006)
- Oxnard (4-004.02)

Nitrate concentration (mg/L as Nitrate), 2019-2023

- 0 - 10
- >10 - 22.5
- >22.5 - 45
- >45 - 90
- >90 - 528

Aquifer designation

- Well screened in the Oxnard aquifer
- Well screened in the Mugu aquifer
- Wells screened in multiple aquifers in the UAS

15P01 Abbreviated State Well Number (see notes)
10.5 Concentration (mg/L)

Notes:
1) Well labels consist of an italicized abbreviated State Well Number (SWN) and a concentration value beneath it.The concentration is the most recent concentration measured in water quality samples collected at that well in the five years from 2019-2023.
2) SWNs are based on Township and Range in the Public Land Survey System. To construct a full SWN from the abbreviation shown on the map,concatenate the Township, Range, abbreviation, and the letter "S". Example: the SWN for the well labeled "15L01" located in Township 02N (T02N) and Range 22W (R22W) is 02N22W15L01S.
3) The shape of each well symbol correspondsto the aquifer(s) in which it is screened (see above).
4) The color of each well symbol corresponds to the most recent concentration measured in a water quality sample from that well.
5) All concentrations are in mg/L.
7) Aquifer designation information for individual wells was provided by FCGMA, CMWD and UWCD.

SOURCE: DWR, FCGMA, VCWPD, CMWD, UWCD

DUDEK

FIGURE 2-33
Upper Aquifer System, Forebay Area - Most Recent Nitrate (mg/L) Measured 2019-2023

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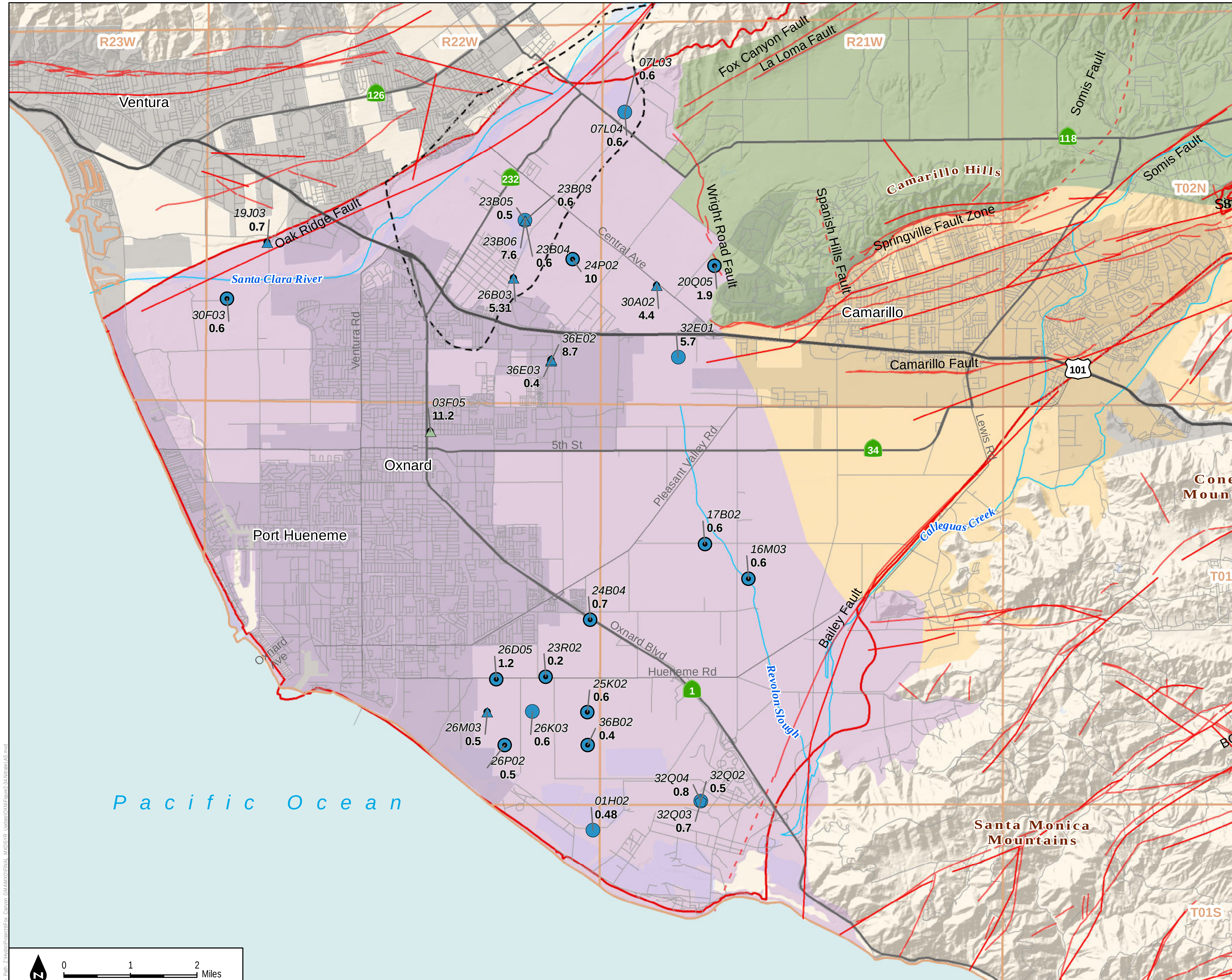

Legend

- Fox Canyon Groundwater Management Agency Boundary (FCGMA 2016)
- Major Rivers/Stream Channels
- Township (North-South) and Range (East-West)
- Faults (Dashed Where Inferred)
- Oxnard Forebay

Revised Bulletin 118 Groundwater Basins and Subbasin (DWR 2018)

- Arroyo Santa Rosa Valley (4-007)
- Las Posas Valley (4-008)
- Pleasant Valley (4-006)
- Oxnard (4-004.02)

Nitrate concentration (mg/L as Nitrate), 2019-2023

- 0 - 10
- >10 - 22.5
- >22.5 - 45
- >45- 90
- >90 - 528

Aquifer designation

- Well screened in the Hueneme aquifer
- Well screened in the Fox Canyon aquifer
- Well screened in the Grimes Canyon aquifer
- Wells screened in multiple aquifers in the LAS

15P01 Abbreviated State Well Number (see notes)
10.5 Concentration (mg/L)

Notes:
1) Well labels consist of an italicized abbreviated State Well Number (SWN) and a concentration value beneath it.The concentration is the most recent concentration measured in water quality samples collected at that well in the five years from 2019-2023.
2) SWNs are based on Township and Range in the Public Land Survey System. To construct a full SWN from the abbreviation shown on the map,concatenate the Township, Range, abbreviation, and the letter "S". Example: the SWN for the well labeled "15L01" located in Township 02N (T02N) and Range 22W (R22W) is 02N22W15L01S.
3) The shape of each well symbol correspondsto the aquifer(s) in which it is screened (see above).
4) The color of each well symbol corresponds to the most recent concentration measured in a water quality sample from that well.
5) All concentrations are in mg/L.
7) Aquifer designation information for individual wells was provided by FCGMA, CMWD and UWCD.

SOURCE: DWR, FCGMA, VCWPD, CMWD, UWCD

DUDEK

FIGURE 2-34

Lower Aquifer System - Most Recent Nitrate (mg/L) Measured 2019-2023

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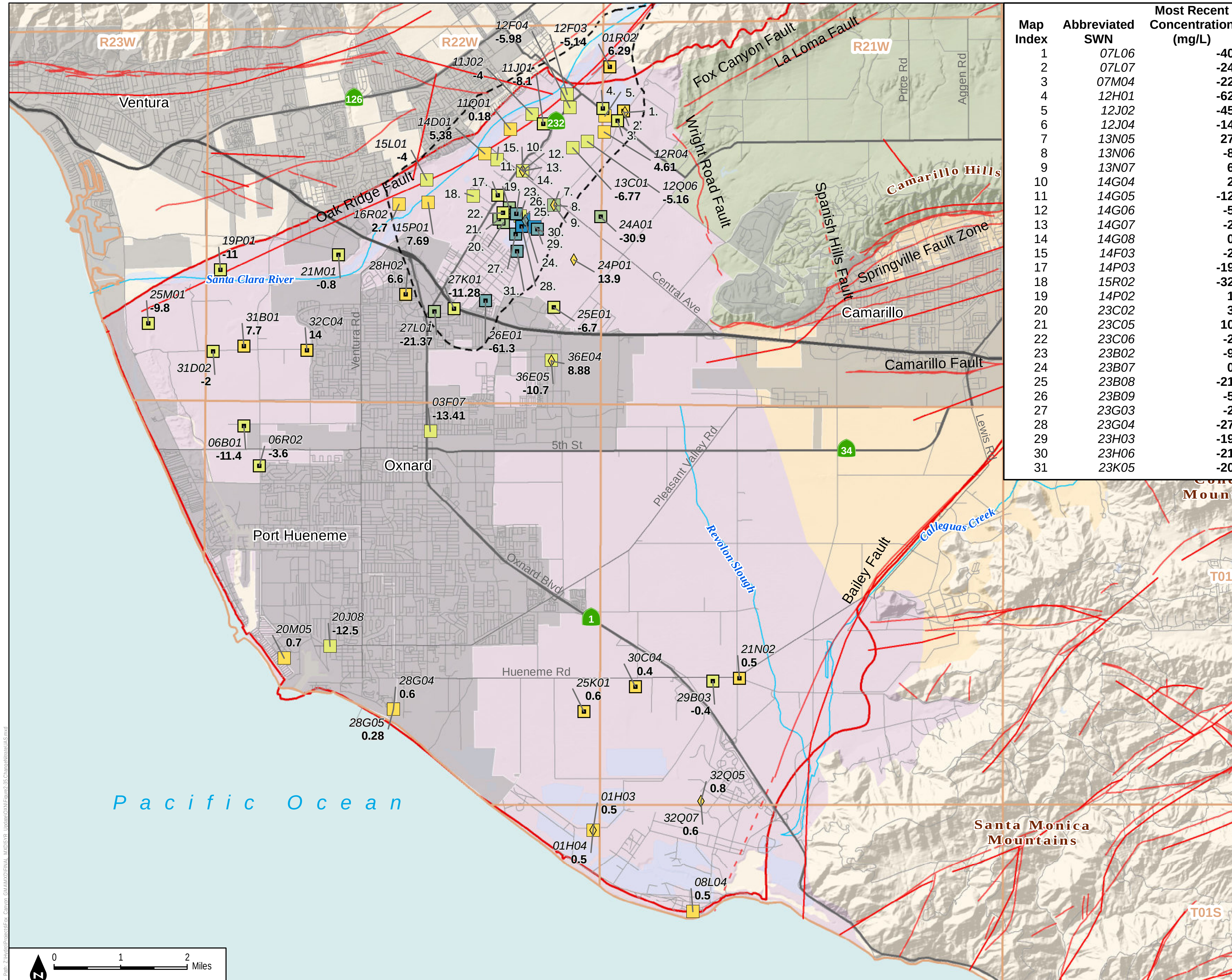

Map Index	Abbreviated SWN	Most Recent Concentration (mg/L)
1	07L06	-40
2	07L07	-24
3	07M04	-22
4	12H01	-62
5	12J02	-45
6	12J04	-14
7	13N05	27
8	13N06	-8
9	13N07	6
10	14G04	2
11	14G05	-12
12	14G06	-5
13	14G07	-2
14	14G08	0
15	14F03	-2
17	14P03	-19
18	15R02	-32
19	14P02	1
20	23C02	3
21	23C05	10
22	23C06	-2
23	23B02	-9
24	23B07	0
25	23B08	-21
26	23B09	-5
27	23G03	-2
28	23G04	-27
29	23H03	-19
30	23H06	-21
31	23K05	-20

Legend

Fox Canyon Groundwater Management Agency Boundary (FCGMA 2016)

Major Rivers/Stream Channels

Township (North-South) and Range (East-West)

Faults (Dashed Where Inferred)

Oxnard Forebay

Revised Bulletin 118 Groundwater Basins and Subbasin (DWR 2018)

Arroyo Santa Rosa Valley (4-007)

Las Posas Valley (4-008)

Pleasant Valley (4-006)

Oxnard (4-004.02)

Aquifer designation

Well screened in the Oxnard aquifer

Well screened in the Mugu aquifer

Wells screened in multiple aquifers in the UAS

Nitrate change in concentration (mg/L)

=< -100

-99 - -50

-49 - -15

-14 - 0

1 - 15

16 - 50

51 - 100

> 100

15P01 Abbreviated State Well Number (see notes)

10.5 Change in Concentration (mg/L)

Notes:
1) Well labels consist of an italicized abbreviated State Well Number (SWN) and change in concentration value beneath it.
The change in concentration represents the difference between the 2011-2015 and 2019-2023 most recent concentrations.
Maps of the 2011-2015 most recent concentration are included in the GSP.
2) SWNs are based on Township and Range in the Public Land Survey System. To construct a full SWN from the abbreviation shown on the map,concatenate the Township, Range, abbreviation, and the letter "S". Example: the SWN for the well labeled "15L01" located in Township 02N (T02N) and Range 22W (R22W) is 02N22W15L01S.
3) The shape of each well symbol correspondsto the aquifer(s) in which it is screened (see above).
4) The color of each well symbol represents the change in groundwater quality measured since the 2011 to 2015 period.
5) All change in concentrations are in mg/L.
6) Aquifer designation information for individual wells was provided by FCGMA, CMWD and UWCD.
7) Negative (-) values represent a decrease in concentration.
Positive (+) values represent an increase in concentration.

DUDEK

SOURCE: DWR, FCGMA, VCWPD, CMWD, UWCD

FIGURE 2-35

Change in Nitrate Concentration (mg/L) in the UAS between 2011-2015 and 2019-2023

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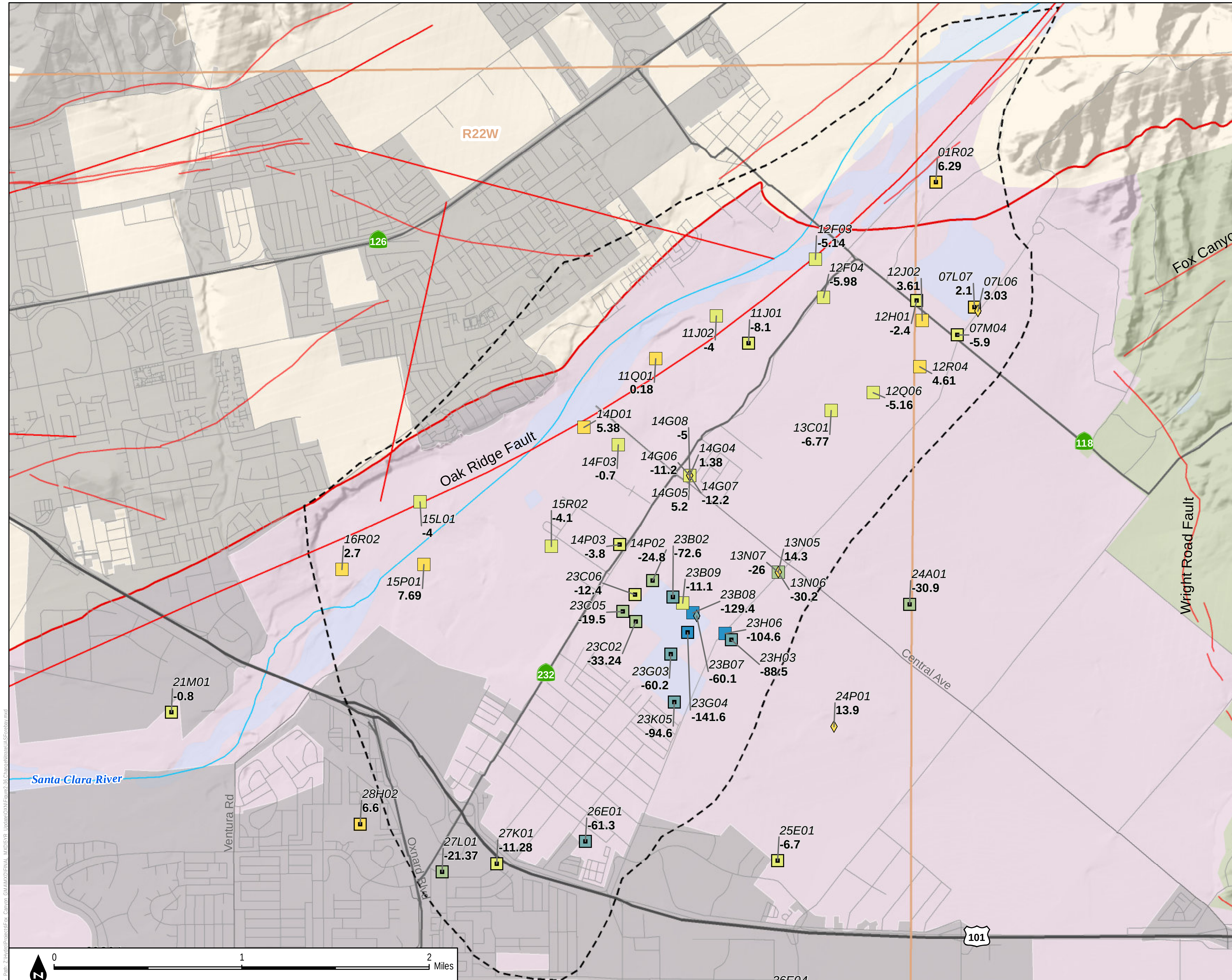

Legend

- Fox Canyon Groundwater Management Agency Boundary (FCGMA 2016)
- Major Rivers/Stream Channels
- Township (North-South) and Range (East-West)
- Faults (Dashed Where Inferred)
- Oxnard Forebay

Revised Bulletin 118 Groundwater Basins and Subbasin (DWR 2018)

- Las Posas Valley (4-008)
- Pleasant Valley (4-006)
- Oxnard (4-004.02)

Nitrate change in concentration (mg/L)

- =< -100
- -99 - -50
- -49 - -15
- -14 - 0
- 1 - 15
- 16 - 50
- 51 - 100
- > 100

Aquifer designation

- Well screened in the Oxnard aquifer
- Well screened in the Mugu aquifer
- Wells screened in multiple aquifers in the UAS

15P01 Abbreviated State Well Number (see notes)
10.5 Change in Concentration (mg/L)

Notes:
1) Well labels consist of an italicized abbreviated State Well Number (SWN) and change in concentration value beneath it.
The change in concentration represents the difference between the 2011-2015 and 2019-2023 most recent concentrations.
Maps of the 2011-2015 most recent concentration are included in the GSP.
2) SWNs are based on Township and Range in the Public Land Survey System. To construct a full SWN from the abbreviation shown on the map,concatenate the Township, Range, abbreviation, and the letter "S". Example: the SWN for the well labeled "15L01" located in Township 02N (T02N) and Range 22W (R22W) is 02N22W15L01S.
3) The shape of each well symbol correspondsto the aquifer(s) in which it is screened (see above).
4) The color of each well symbol represents the change in groundwater quality measured since the 2011 to 2015 period.
5) All change in concentrations are in mg/L.
6) Aquifer designation information for individual wells was provided by FCGMA, CMWD and UWCD.
7) Negative (-) values represent a decrease in concentration. Positive (+) values represent an increase in concentration.

DUDEK

SOURCE: DWR, FCGMA, VCWPD, CMWD, UWCD

FIGURE 2-36

Change in Nitrate Concentration (mg/L) in the UAS, Forebay Area, between 2011-2015 and 2019-2023

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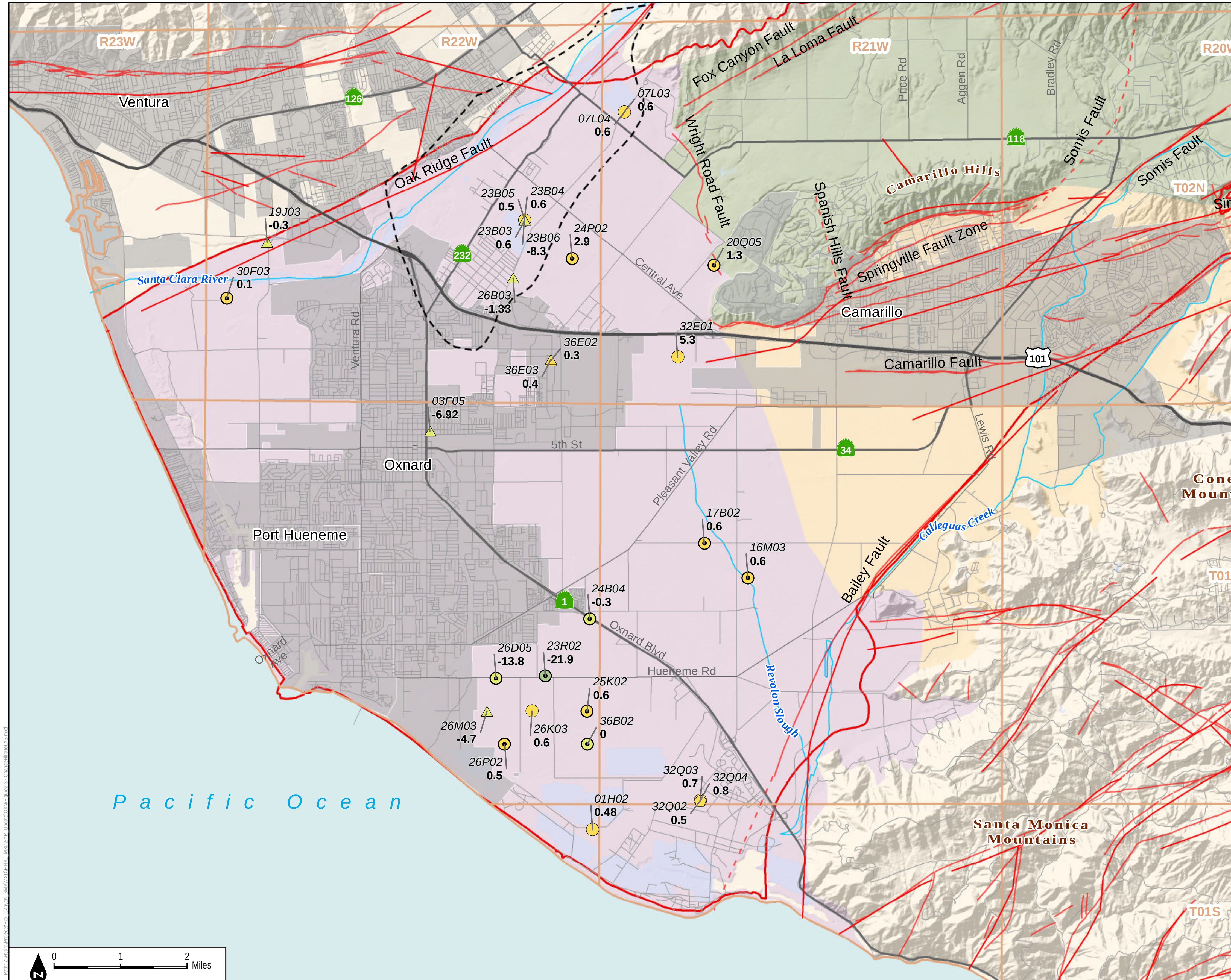

Legend

- Fox Canyon Groundwater Management Agency Boundary (FCGMA 2016)
- Major Rivers/Stream Channels
- Township (North-South) and Range (East-West)
- Faults (Dashed Where Inferred)
- Oxnard Forebay

Revised Bulletin 118 Groundwater Basins and Subbasin (DWR 2018)

- Arroyo Santa Rosa Valley (4-007)
- Las Posas Valley (4-008)
- Pleasant Valley (4-006)
- Oxnard (4-004.02)

Aquifer designation

- Well screened in the Hueneme aquifer
- Well screened in the Fox Canyon aquifer
- Well screened in the Grimes Canyon aquifer
- Wells screened in multiple aquifers in the LAS

Nitrate change in concentration (mg/L)

- =< -100
- -99 - -50
- -49 - -15
- -14 - 0
- 1 - 15
- 16 - 50
- 51 - 100
- > 100

15P01 Abbreviated State Well Number (see notes)
10.5 Change in Concentration (mg/L)

Notes:
1) Well labels consist of an italicized abbreviated State Well Number (SWN) and change in concentration value beneath it. The change in concentration represents the difference between the 2011-2015 and 2019-2023 most recent concentrations. Maps of the 2011-2015 most recent concentration are included in the GSP.
2) SWNs are based on Township and Range in the Public Land Survey System. To construct a full SWN from the abbreviation shown on the map,concatenate the Township, Range, abbreviation, and the letter "S". Example: the SWN for the well labeled "15L01" located in Township 02N (T02N) and Range 22W (R22W) is 02N22W15L01S.
3) The shape of each well symbol correspondsto the aquifer(s) in which it is screened (see above).
4) The color of each well symbol represents the change in groundwater quality measured since the 2011 to 2015 period.
5) All change in concentrations are in mg/L.
6) Aquifer designation information for individual wells was provided by FCGMA, CMWD and UWCD.
7) Negative (-) values represent a decrease in concentration. Positive (+) values represent an increase in concentration.

DUDEK

SOURCE: DWR, FCGMA, VCWPD, CMWD, UWCD

FIGURE 2-37

Change in Nitrate Concentration (mg/L) in the LAS between 2011-2015 and 2019-2023

Groundwater Sustainability Plan for the Oxnard Subbasin: First Periodic Evaluation

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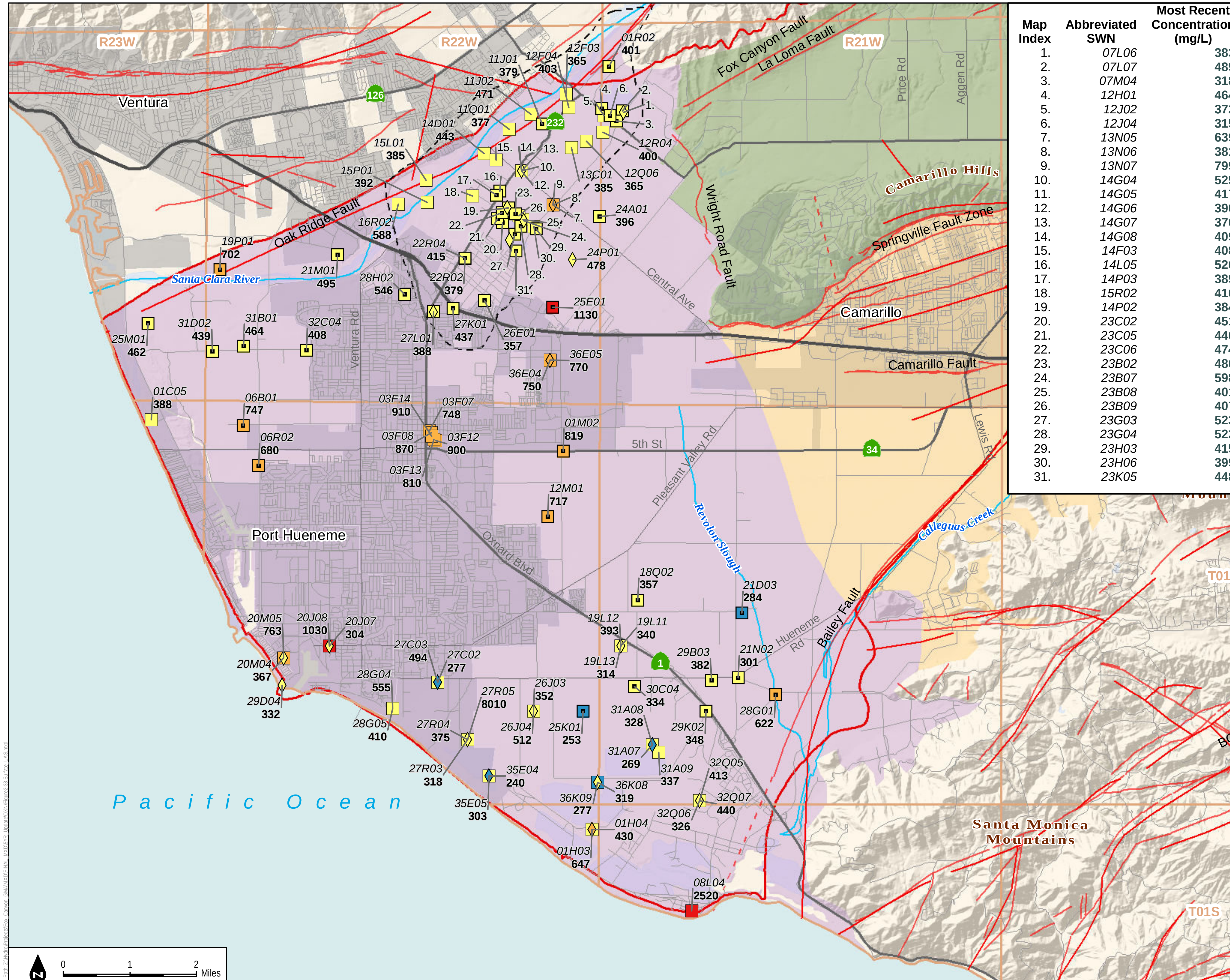

Map Index	Abbreviated SWN	Most Recent Concentration (mg/L)
1.	07L06	383
2.	07L07	489
3.	07M04	318
4.	12H01	464
5.	12J02	372
6.	12J04	315
7.	13N05	639
8.	13N06	381
9.	13N07	799
10.	14G04	525
11.	14G05	417
12.	14G06	390
13.	14G07	376
14.	14G08	409
15.	14F03	408
16.	14L05	526
17.	14P03	389
18.	15R02	416
19.	14P02	384
20.	23C02	451
21.	23C05	446
22.	23C06	474
23.	23B02	486
24.	23B07	598
25.	23B08	401
26.	23B09	407
27.	23G03	523
28.	23G04	522
29.	23H03	415
30.	23H06	399
31.	23K05	448

Legend

- Fox Canyon Groundwater Management Agency Boundary (FCGMA 2016)
- Major Rivers/Stream Channels
- Township (North-South) and Range (East-West)
- Faults (Dashed Where Inferred)
- Oxnard Forebay

Revised Bulletin 118 Groundwater Basins and Subbasin (DWR 2018)

- Arroyo Santa Rosa Valley (4-007)
- Las Posas Valley (4-008)
- Pleasant Valley (4-006)
- Oxnard (4-004.02)

Sulfate concentration (mg/L), 2019-2023

- 29 - 300
- 301 - 600
- 601 - 1000
- 1001 - 5740

Aquifer designation

- Well screened in the Oxnard aquifer
- Well screened in the Mugu aquifer
- Wells screened in multiple aquifers in the UAS

15P01 Abbreviated State Well Number (see notes)
10.5 Concentration (mg/L)

Notes:
1) Well labels consist of an italicized abbreviated State Well Number (SWN) and a concentration value beneath it.The concentration is the most recent concentration measured in water quality samples collected at that well in the five years from 2019-2023.
2) SWNs are based on Township and Range in the Public Land Survey System. To construct a full SWN from the abbreviation shown on the map,concatenate the Township, Range, abbreviation, and the letter "S". Example: the SWN for the well labeled "15L01" located in Township 02N (T02N) and Range 22W (R22W) is 02N22W15L01S.
3) The shape of each well symbol corresponds to the aquifer(s) in which it is screened (see above).
4) The color of each well symbol corresponds to the most recent concentration measured in a water quality sample from that well.
5) All concentrations are in mg/L.
6) Aquifer designation information for individual wells was provided by FCGMA, CMWD and UWCD.

SOURCE: DWR, FCGMA, VCWPD, CMWD, UWCD

DUDEK

FIGURE 2-38

Upper Aquifer System - Most Recent Sulfate (mg/L) Measured 2019-2023

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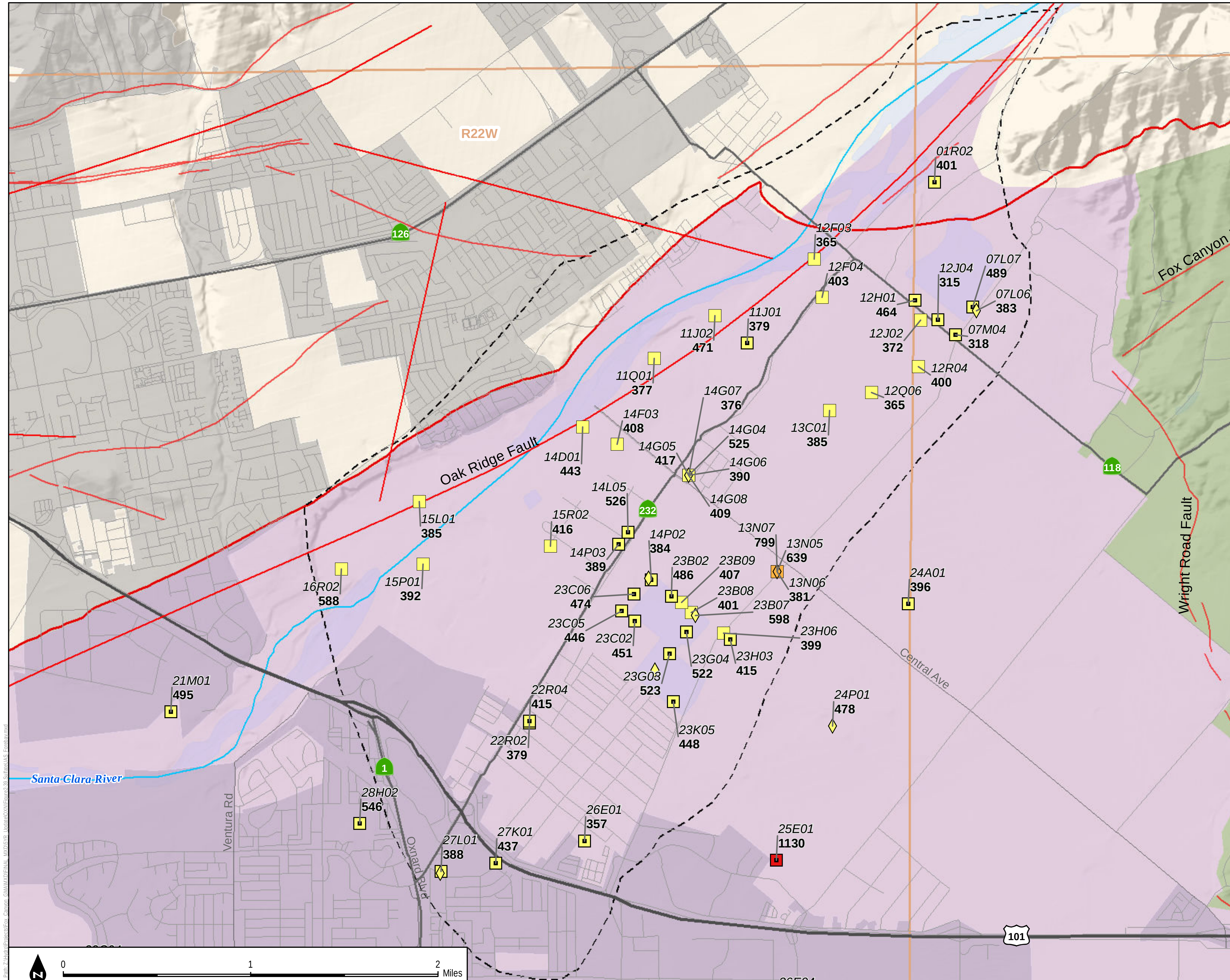

Legend

- Fox Canyon Groundwater Management Agency Boundary (FCGMA 2016)
- Major Rivers/Stream Channels
- Township (North-South) and Range (East-West)
- Faults (Dashed Where Inferred)
- Oxnard Forebay

Revised Bulletin 118 Groundwater Basins and Subbasin (DWR 2018)

- Las Posas Valley (4-008)
- Pleasant Valley (4-006)
- Oxnard (4-004.02)

Sulfate concentration (mg/L), 2019-2023

- 29 - 300
- 301 - 600
- 601 - 1000
- 1001 - 5740

Aquifer designation

- Well screened in the Oxnard aquifer
- Well screened in the Mugu aquifer
- Wells screened in multiple aquifers in the UAS

15P01 Abbreviated State Well Number (see notes)
10.5 Concentration (mg/L)

Notes:
1) Well labels consist of an italicized abbreviated State Well Number (SWN) and a concentration value beneath it.The concentration is the most recent concentration measured in water quality samples collected at that well in the five years from 2019-2023.
2) SWNs are based on Township and Range in the Public Land Survey System. To construct a full SWN from the abbreviation shown on the map,concatenate the Township, Range, abbreviation, and the letter "S". Example: the SWN for the well labeled "15L01" located in Township 02N (T02N) and Range 22W (R22W) is 02N22W15L01S.
3) The shape of each well symbol correspondsto the aquifer(s) in which it is screened (see above).
4) The color of each well symbol corresponds to the most recent concentration measured in a water quality sample from that well.
5) All concentrations are in mg/L.
7) Aquifer designation information for individual wells was provided by FCGMA, CMWD and UWCD.

SOURCE: DWR, FCGMA, VCWPD, CMWD, UWCD

DUDEK

FIGURE 2-39

Upper Aquifer System, Forebay Area - Most Recent Sulfate (mg/L) Measured 2019-2023

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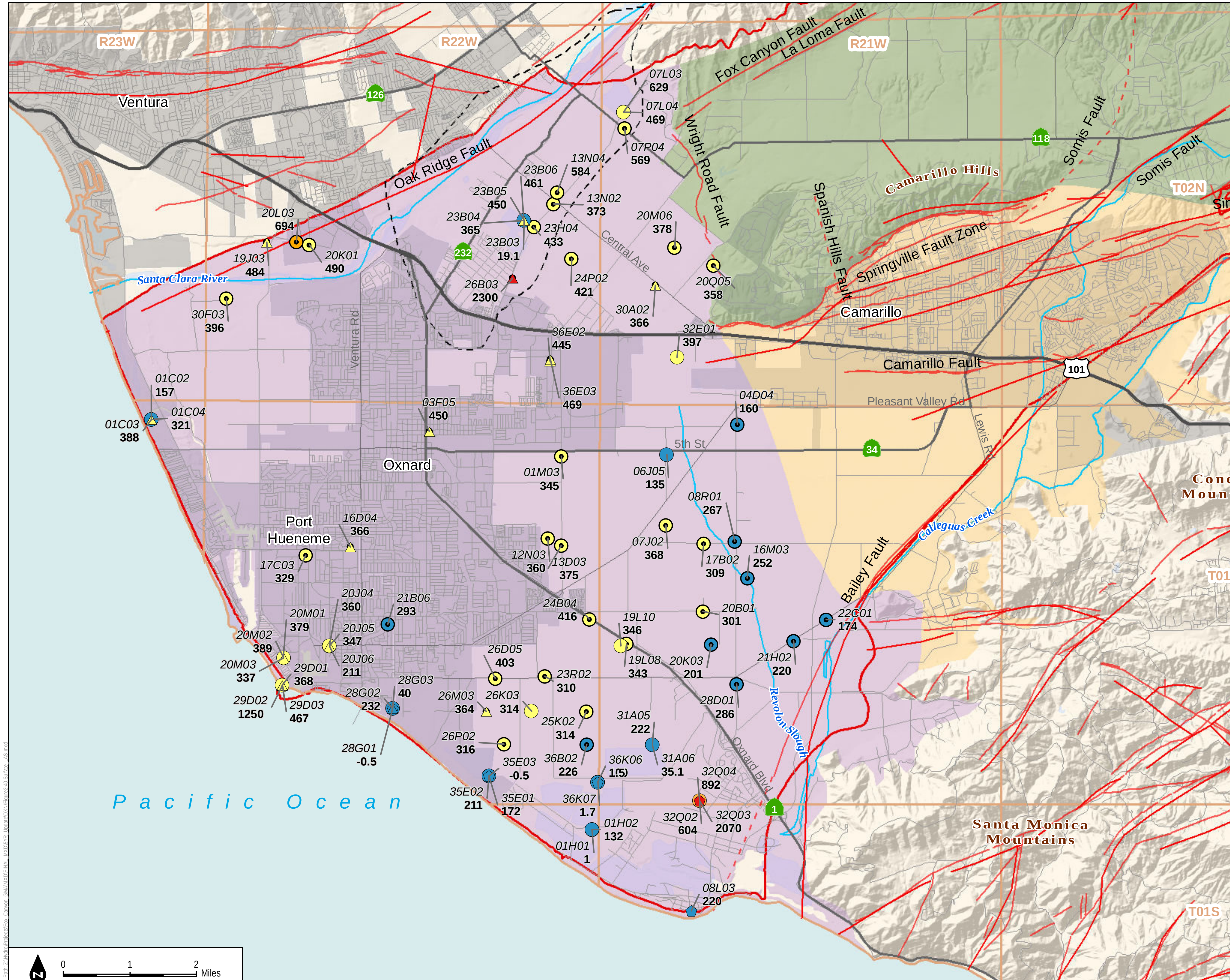

Legend

- Fox Canyon Groundwater Management Agency Boundary (FCGMA 2016)
- Major Rivers/Stream Channels
- Township (North-South) and Range (East-West)
- Faults (Dashed Where Inferred)
- Oxnard Forebay

Revised Bulletin 118 Groundwater Basins and Subbasin (DWR 2018)

- Arroyo Santa Rosa Valley (4-007)
- Las Posas Valley (4-008)
- Pleasant Valley (4-006)
- Oxnard (4-004.02)

Sulfate concentration (mg/L), 2019-2023

- 29 - 300
- 301 - 600
- 601 - 1000
- 1001 - 5740

Aquifer designation

- Well screened in the Hueneme aquifer
- Well screened in the Fox Canyon aquifer
- Well screened in the Grimes Canyon aquifer
- Wells screened in multiple aquifers in the LAS

15P01 Abbreviated State Well Number (see notes)
10.5 Concentration (mg/L)

Notes:
1) Well labels consist of an italicized abbreviated State Well Number (SWN) and a concentration value beneath it.The concentration is the most recent concentration measured in water quality samples collected at that well in the five years from 2019-2023.
2) SWNs are based on Township and Range in the Public Land Survey System. To construct a full SWN from the abbreviation shown on the map,concatenate the Township, Range, abbreviation, and the letter "S". Example: the SWN for the well labeled "15L01" located in Township 02N (T02N) and Range 22W (R22W) is 02N22W15L01S.
3) The shape of each well symbol correspondsto the aquifer(s) in which it is screened (see above).
4) The color of each well symbol corresponds to the most recent concentration measured in a water quality sample from that well.
5) All concentrations are in mg/L.
7) Aquifer designation information for individual wells was provided by FCGMA, CMWD and UWCD.

SOURCE: DWR, FCGMA, VCWPD, CMWD, UWCD

DUDEK

FIGURE 2-40
Lower Aquifer System - Most Recent Sulfate (mg/L) Measured 2019-2023

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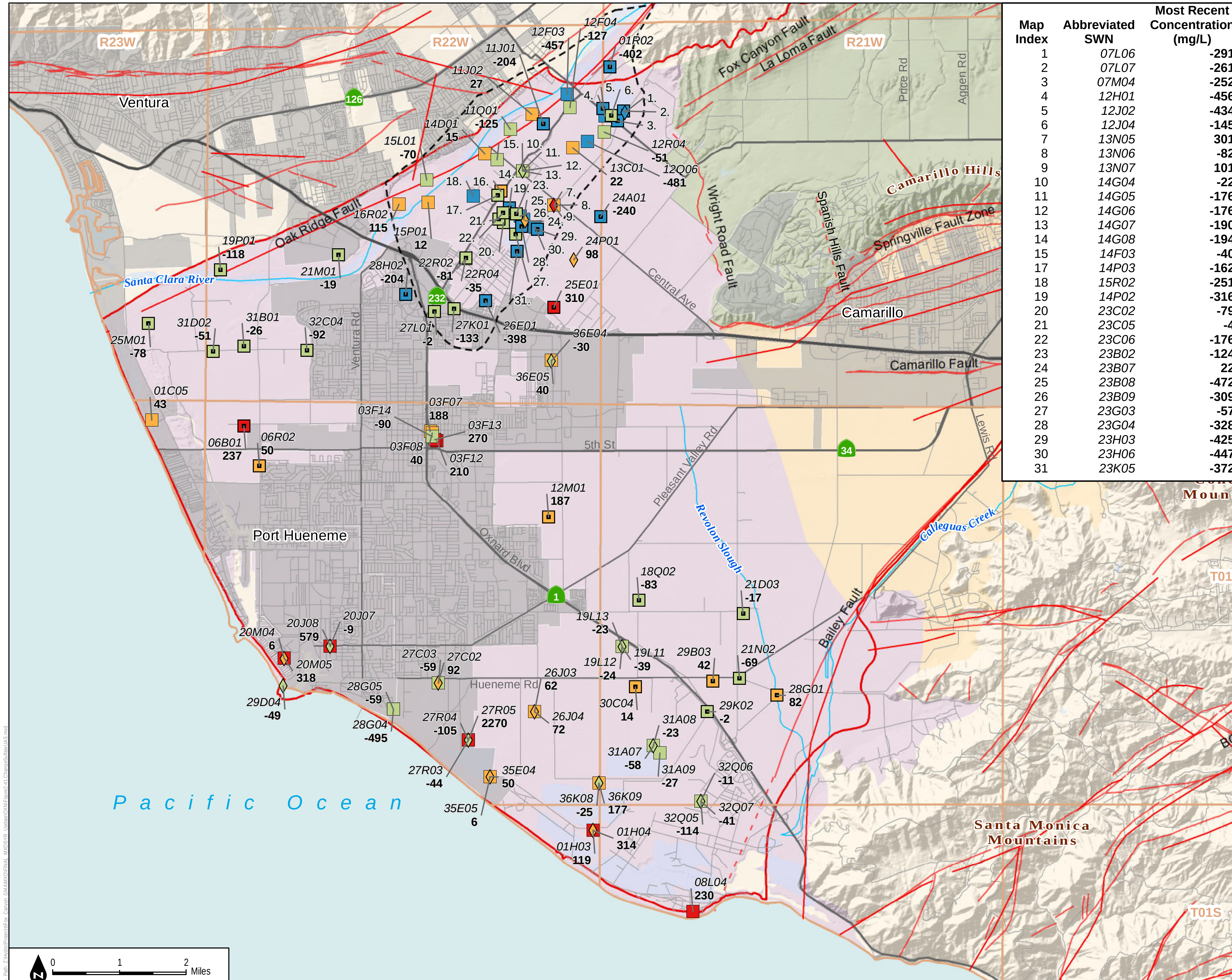

Map Index	Abbreviated SWN	Most Recent Concentration (mg/L)
1	07L06	-291
2	07L07	-261
3	07M04	-252
4	12H01	-456
5	12J02	-434
6	12J04	-145
7	13N05	301
8	13N06	-82
9	13N07	101
10	14G04	-22
11	14G05	-176
12	14G06	-176
13	14G07	-190
14	14G08	-194
15	14F03	-40
17	14P03	-162
18	15R02	-251
19	14P02	-316
20	23C02	-79
21	23C05	-4
22	23C06	-176
23	23B02	-124
24	23B07	22
25	23B08	-472
26	23B09	-309
27	23G03	-57
28	23G04	-328
29	23H03	-425
30	23H06	-447
31	23K05	-372

Legend

- Fox Canyon Groundwater Management Agency Boundary (FCGMA 2016)
- Major Rivers/Stream Channels
- Township (North-South) and Range (East-West)
- Faults (Dashed Where Inferred)
- Oxnard Forebay

Revised Bulletin 118 Groundwater Basins and Subbasin (DWR 2018)

- Arroyo Santa Rosa Valley (4-007)
- Las Posas Valley (4-008)
- Pleasant Valley (4-006)
- Oxnard (4-004.02)

Sulfate change in concentration (mg/L)

- =< -200
- -199 - 0
- 0 - 200
- > 200

Aquifer designation

- Well screened in the Oxnard aquifer
- Well screened in the Mugu aquifer
- Wells screened in multiple aquifers in the UAS

15P01 Abbreviated State Well Number (see notes)
10.5 Change in Concentration (mg/L)

Notes:
1) Well labels consist of an italicized abbreviated State Well Number (SWN) and change in concentration value beneath it.
The change in concentration represents the difference between the 2011-2015 and 2019-2023 most recent concentrations.
Maps of the 2011-2015 most recent concentration are included in the GSP.
2) SWNs are based on Township and Range in the Public Land Survey System. To construct a full SWN from the abbreviation shown on the map,concatenate the Township, Range, abbreviation, and the letter "S". Example: the SWN for the well labeled "15L01" located in Township 02N (T02N) and Range 22W (R22W) is 02N22W15L01S.
3) The shape of each well symbol correspondsto the aquifer(s) in which it is screened (see above).
4) The color of each well symbol represents the change in groundwater quality measured since the 2011 to 2015 period.
5) All change in concentrations are in mg/L.
6) Aquifer designation information for individual wells was provided by FCGMA, CMWD and UWCD.
7) Negative (-) values represent a decrease in concentration. Positive (+) values represent an increase in concentration.

SOURCE: DWR, FCGMA, VCWPD, CMWD, UWCD

DUDEK

FIGURE 2-41
Change in Sulfate Concentration (mg/L) in the UAS between 2011-2015 and 2019-2023

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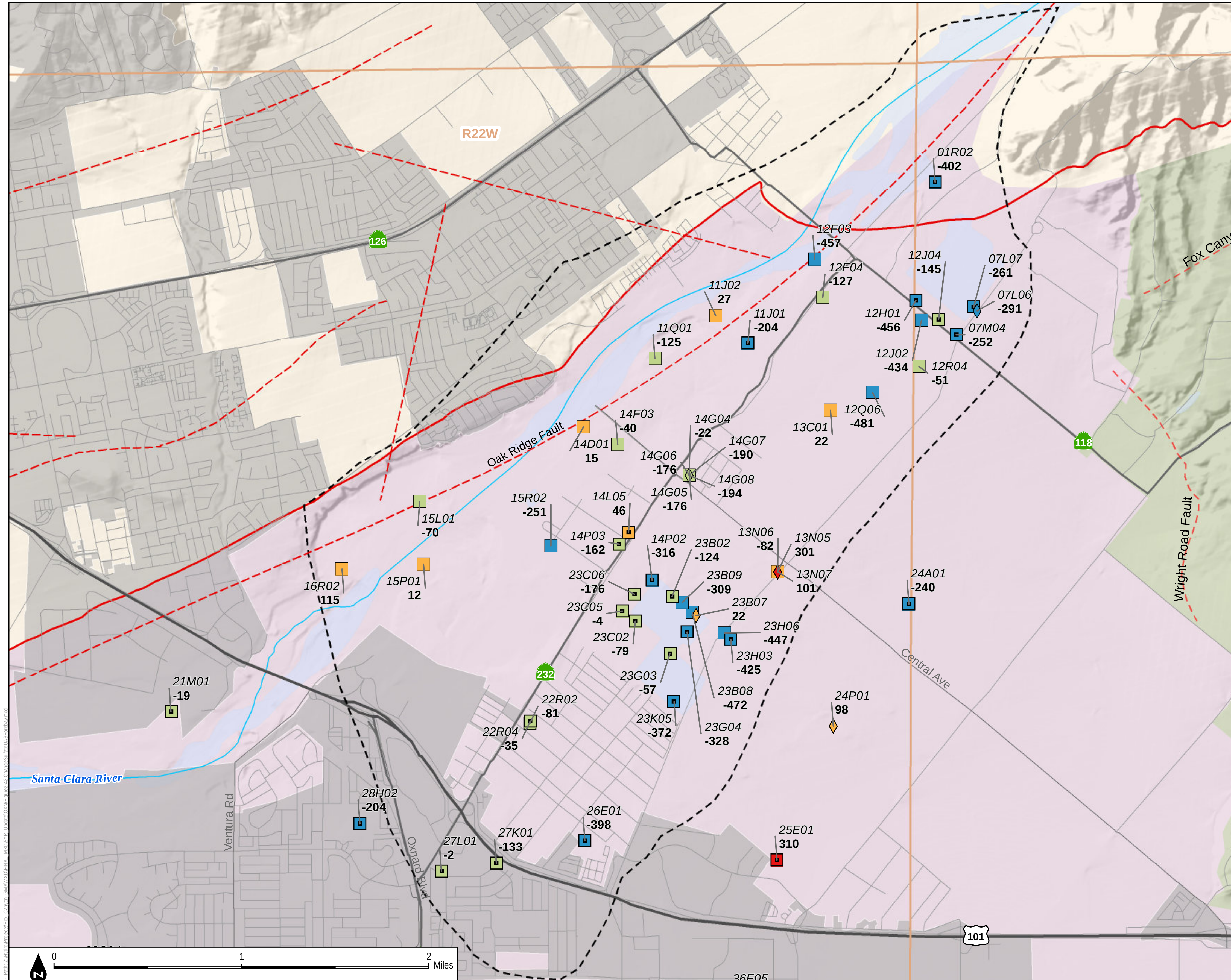

Legend

- Fox Canyon Groundwater Management Agency Boundary (FCGMA 2016)
- Major Rivers/Stream Channels
- Township (North-South) and Range (East-West)
- Oxnard Forebay

Revised Bulletin 118 Groundwater Basins and Subbasin (DWR 2018)

- Las Posas Valley (4-008)
- Pleasant Valley (4-006)
- Oxnard (4-004.02)

Sulfate change in concentration (mg/L)

- =< -200
- -199 - 0
- 1 - 200
- > 201

Aquifer designation

- Well screened in the Oxnard aquifer
- Well screened in the Mugu aquifer
- Wells screened in multiple aquifers in the UAS

15P01 Abbreviated State Well Number (see notes)
10.5 Change in Concentration (mg/L)

Notes:
1) Well labels consist of an italicized abbreviated State Well Number (SWN) and change in concentration value beneath it.
The change in concentration represents the difference between the 2011-2015 and 2019-2023 most recent concentrations.
Maps of the 2011-2015 most recent concentration are included in the GSP.
2) SWNs are based on Township and Range in the Public Land Survey System. To construct a full SWN from the abbreviation shown on the map,concatenate the Township, Range, abbreviation, and the letter "S". Example: the SWN for the well labeled "15L01" located in Township 02N (T02N) and Range 22W (R22W) is 02N22W15L01S.
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4) The color of each well symbol represents the change in groundwater quality measured since the 2011 to 2015 period.
5) All change in concentrations are in mg/L.
6) Aquifer designation information for individual wells was provided by FCGMA, CMWD and UWCD.
7) Negative (-) values represent a decrease in concentration. Positive (+) values represent an increase in concentration.

SOURCE: DWR, FCGMA, VCWPD, CMWD, UWCD

DUDEK

FIGURE 2-42

Change in Sulfate Concentration (mg/L) in the UAS, Forebay Area, between 2011-2015 and 2019-2023

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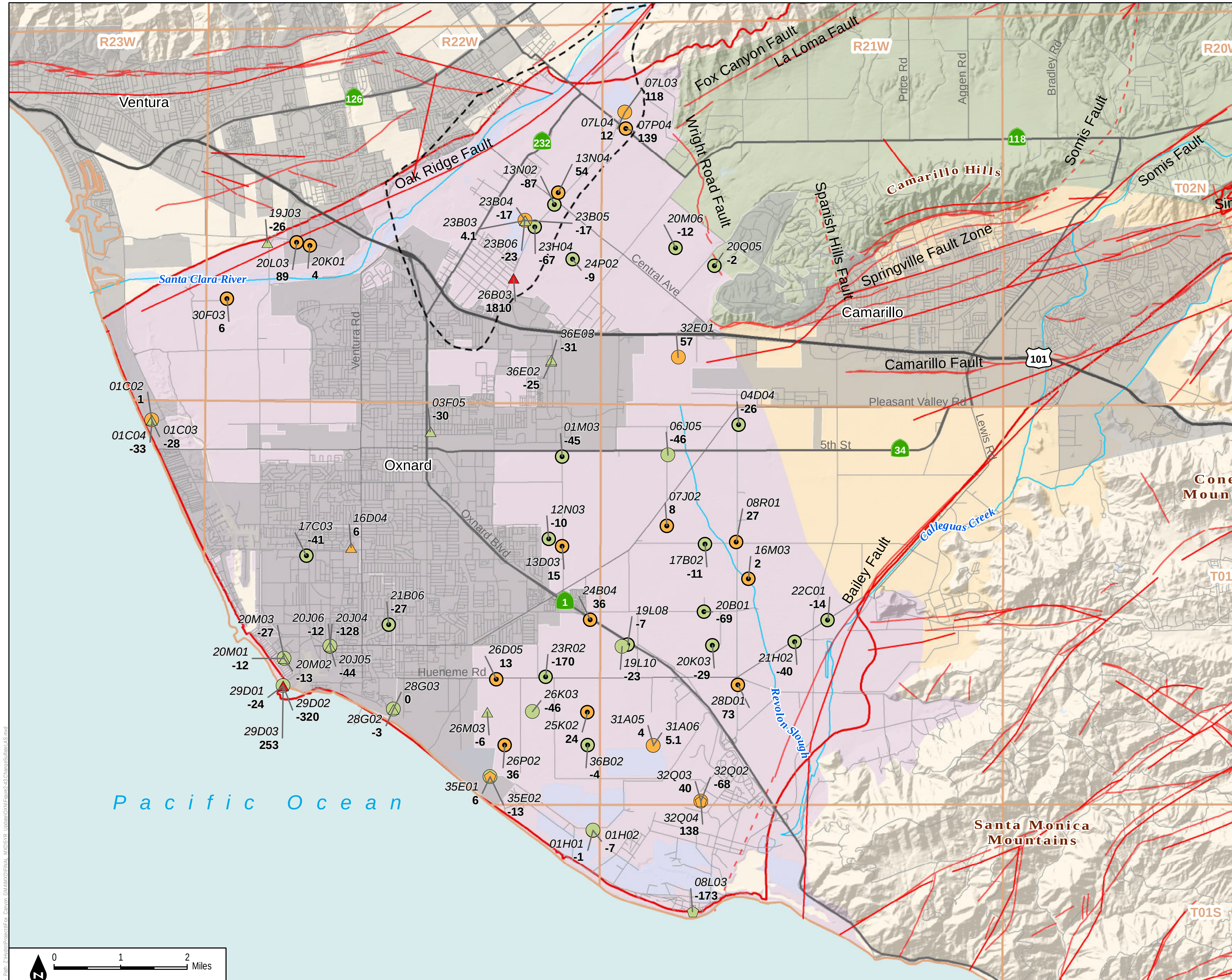

Legend

- Fox Canyon Groundwater Management Agency Boundary (FCGMA 2016)
- Major Rivers/Stream Channels
- Township (North-South) and Range (East-West)
- Faults (Dashed Where Inferred)
- Oxnard Forebay

Revised Bulletin 118 Groundwater Basins and Subbasin (DWR 2018)

- Arroyo Santa Rosa Valley (4-007)
- Las Posas Valley (4-008)
- Pleasant Valley (4-006)
- Oxnard (4-004.02)

Sulfate change in concentration (mg/L)

- =< -200
- >-200 - 0
- >0 - 200
- >200

Aquifer designation

- Well screened in the Hueneme aquifer
- Well screened in the Fox Canyon aquifer
- Well screened in the Grimes Canyon aquifer
- Wells screened in multiple aquifers in the LAS

15P01 Abbreviated State Well Number (see notes)
10.5 Change in Concentration (mg/L)

Notes:
1) Well labels consist of an italicized abbreviated State Well Number (SWN) and change in concentration value beneath it. The change in concentration represents the difference between the 2011-2015 and 2019-2023 most recent concentrations. Maps of the 2011-2015 most recent concentration are included in the GSP.
2) SWNs are based on Township and Range in the Public Land Survey System. To construct a full SWN from the abbreviation shown on the map,concatenate the Township, Range, abbreviation, and the letter "S". Example: the SWN for the well labeled "15L01" located in Township 02N (T02N) and Range 22W (R22W) is 02N22W15L01S.
3) The shape of each well symbol correspondsto the aquifer(s) in which it is screened (see above).
4) The color of each well symbol represents the change in groundwater quality measured since the 2011 to 2015 period.
5) All change in concentrations are in mg/L.
6) Aquifer designation information for individual wells was provided by FCGMA, CMWD and UWCD.
7) Negative (-) values represent a decrease in concentration. Positive (+) values represent an increase in concentration.

SOURCE: DWR, FCGMA, VCWPD, CMWD, UWCD

FIGURE 2-43

Change in Sulfate Concentration (mg/L) in the LAS between 2011-2015 and 2019-2023

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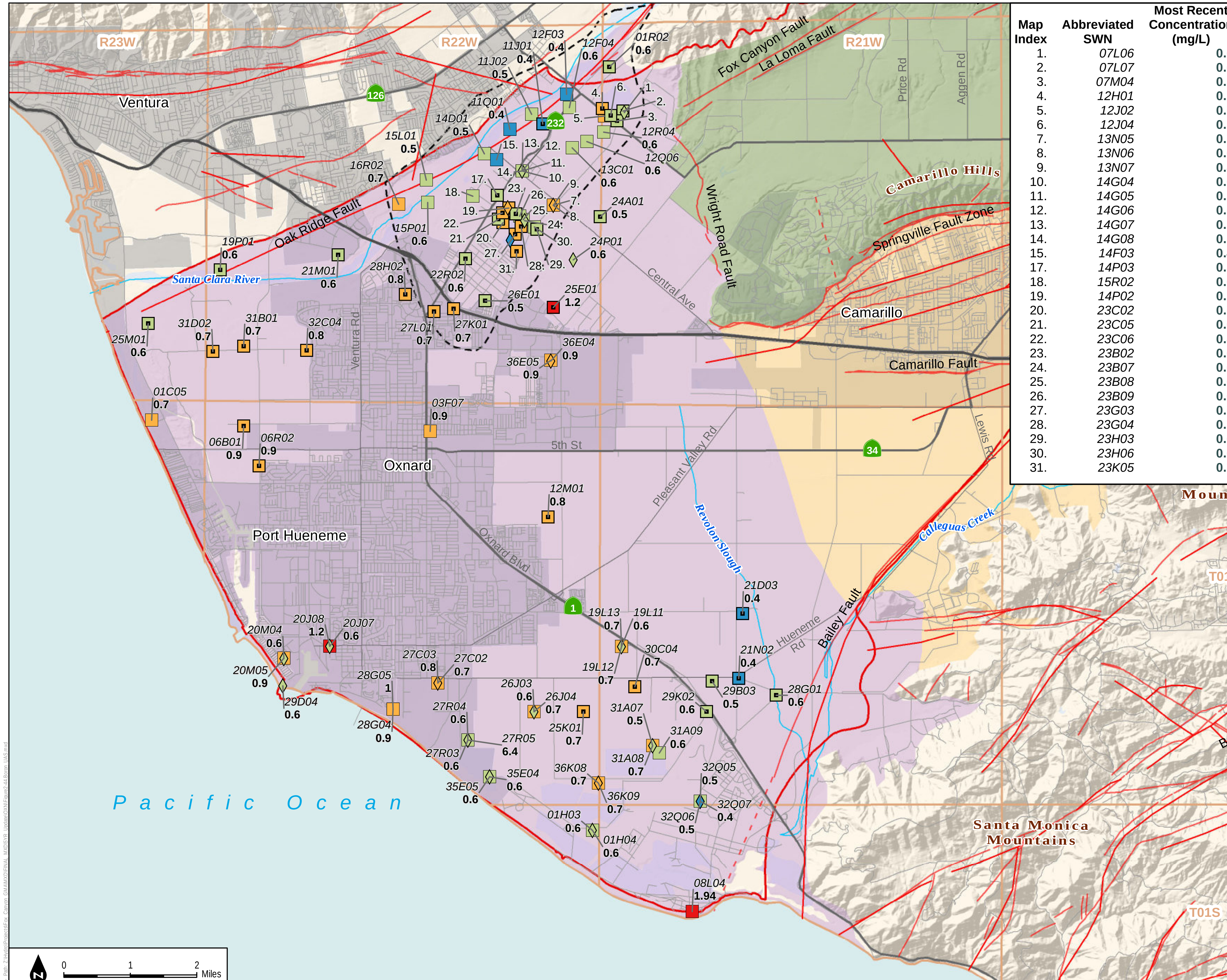

Map Index	Abbreviated Fault SWN	Most Recent Concentration (mg/L)
1.	07L06	0.6
2.	07L07	0.6
3.	07M04	0.5
4.	12H01	0.7
5.	12J02	0.7
6.	12J04	0.5
7.	13N05	0.7
8.	13N06	0.6
9.	13N07	0.8
10.	14G04	0.6
11.	14G05	0.5
12.	14G06	0.5
13.	14G07	0.5
14.	14G08	0.5
15.	14F03	0.4
17.	14P03	0.5
18.	15R02	0.6
19.	14P02	0.7
20.	23C02	0.7
21.	23C05	0.6
22.	23C06	0.8
23.	23B02	0.6
24.	23B07	0.6
25.	23B08	0.6
26.	23B09	0.6
27.	23G03	0.7
28.	23G04	0.7
29.	23H03	0.6
30.	23H06	0.6
31.	23K05	0.7

Legend

- Fox Canyon Groundwater Management Agency Boundary (FCGMA 2016)
- Major Rivers/Stream Channels
- Township (North-South) and Range (East-West)
- Faults (Dashed Where Inferred)
- Oxnard Forebay

Revised Bulletin 118 Groundwater Basins and Subbasin (DWR 2018)

- Arroyo Santa Rosa Valley (4-007)
- Las Posas Valley (4-008)
- Pleasant Valley (4-006)
- Oxnard (4-004.02)

Boron concentration (mg/L), 2019-2023

- 0- 0.4
- >0.4 - 0.6
- >0.6 - 1.0
- >1.0 - 2.0

Aquifer designation

- Well screened in the Oxnard aquifer
- Well screened in the Mugu aquifer
- Wells screened in multiple aquifers in the UAS

15P01 Abbreviated State Well Number (see notes)
10.5 Concentration (mg/L)

Notes:
1) Well labels consist of an italicized abbreviated State Well Number (SWN) and a concentration value beneath it.The concentration is the most recent concentration measured in water quality samples collected at that well in the five years from 2019-2023.
2) SWNs are based on Township and Range in the Public Land Survey System. To construct a full SWN from the abbreviation shown on the map,concatenate the Township, Range, abbreviation, and the letter "S". Example: the SWN for the well labeled "15L01" located in Township 02N (T02N) and Range 22W (R22W) is 02N22W15L01S.
3) The shape of each well symbol corresponds to the aquifer(s) in which it is screened (see above).
4) The color of each well symbol corresponds to the most recent concentration measured in a water quality sample from that well.
5) All concentrations are in mg/L.
6) Aquifer designation information for individual wells was provided by FCGMA, CMWD and UWCD.

SOURCE: DWR, FCGMA, VCWPD, CMWD, UWCD

FIGURE 2-44
Upper Aquifer System - Most Recent Boron (mg/L) Measured 2019-2023

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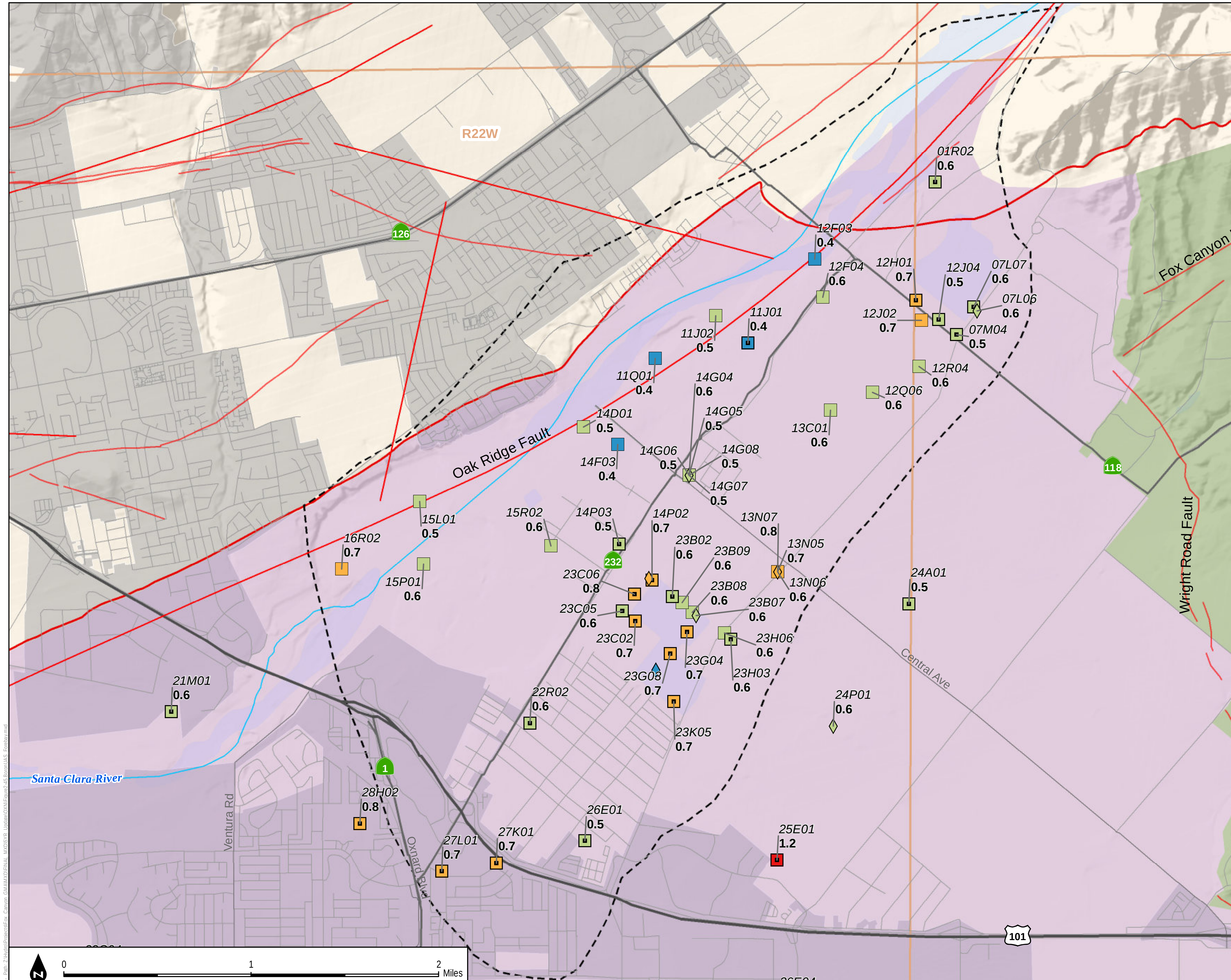

Legend

- Fox Canyon Groundwater Management Agency Boundary (FCGMA 2016)
- Major Rivers/Stream Channels
- Township (North-South) and Range (East-West)
- Faults (Dashed Where Inferred)
- Oxnard Forebay

Revised Bulletin 118 Groundwater Basins and Subbasin (DWR 2018)

- Las Posas Valley (4-008)
- Pleasant Valley (4-006)
- Oxnard (4-004.02)

Boron concentration (mg/L), 2019-2023

- 0- 0.4
- >0.4 - 0.6
- >0.6 - 1.0
- >1.0 - 2.0

Aquifer designation

- Well screened in the Oxnard aquifer
- Well screened in the Mugu aquifer
- Wells screened in multiple aquifers in the UAS

15P01 Abbreviated State Well Number (see notes)
10.5 Concentration (mg/L)

Notes:
1) Well labels consist of an italicized abbreviated State Well Number (SWN) and a concentration value beneath it.The concentration is the most recent concentration measured in water quality samples collected at that well in the five years from 2019-2023.
2) SWNs are based on Township and Range in the Public Land Survey System. To construct a full SWN from the abbreviation shown on the map,concatenate the Township, Range, abbreviation, and the letter "S". Example: the SWN for the well labeled "15L01" located in Township 02N (T02N) and Range 22W (R22W) is 02N22W15L01S.
3) The shape of each well symbol correspondsto the aquifer(s) in which it is screened (see above).
4) The color of each well symbol corresponds to the most recent concentration measured in a water quality sample from that well.
5) All concentrations are in mg/L.
7) Aquifer designation information for individual wells was provided by FCGMA, CMWD and UWCD.

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SOURCE: DWR, FCGMA, VCWPD, CMWD, UWCD

FIGURE 2-45

Upper Aquifer System, Forebay Area - Most Recent Boron (mg/L) Measured 2019-2023

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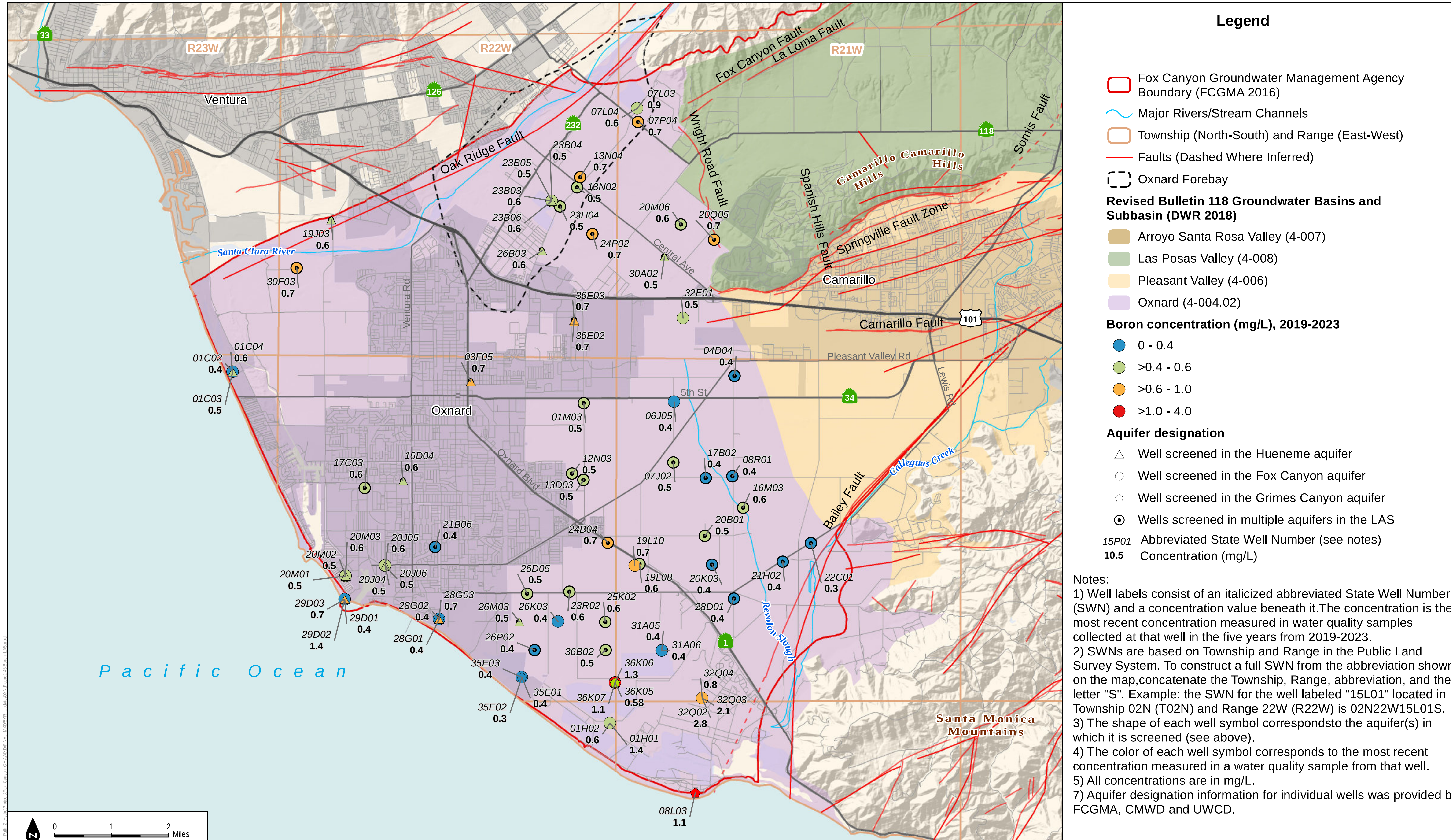

SOURCE: DWR, FCGMA, VCWPD, CMWD, UWCD

DUDEK

FIGURE 2-46

Lower Aquifer System - Most Recent Boron (mg/L) Measured 2019-2023

Groundwater Sustainability Plan for the Oxnard Subbasin: First Periodic Evaluation

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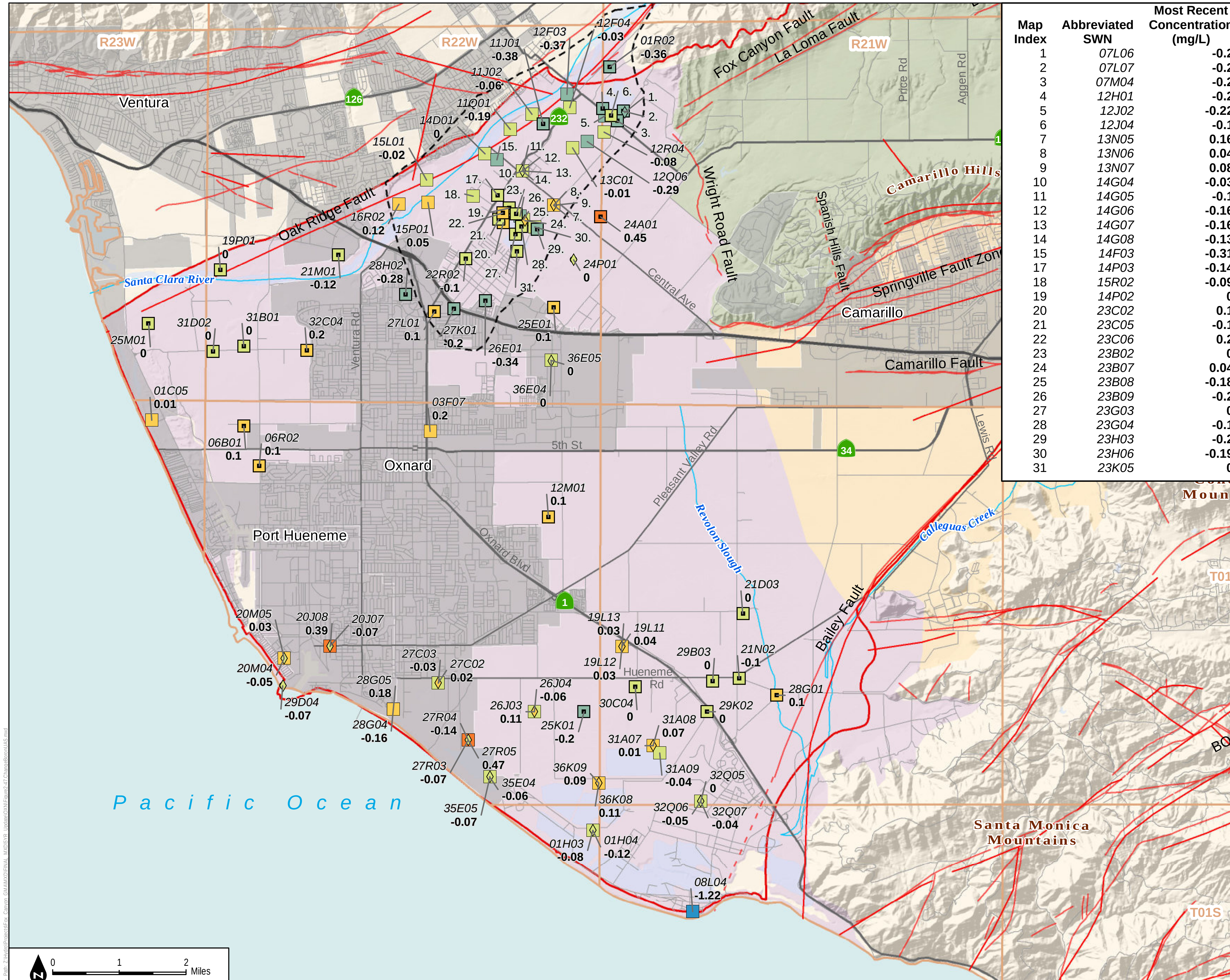

Map Index	Abbreviated SWN	Most Recent Concentration (mg/L)
1	07L06	-0.2
2	07L07	-0.2
3	07M04	-0.2
4	12H01	-0.2
5	12J02	-0.22
6	12J04	-0.1
7	13N05	0.16
8	13N06	0.04
9	13N07	0.08
10	14G04	-0.03
11	14G05	-0.1
12	14G06	-0.16
13	14G07	-0.16
14	14G08	-0.13
15	14F03	-0.31
17	14P03	-0.14
18	15R02	-0.09
19	14P02	0
20	23C02	0.1
21	23C05	-0.1
22	23C06	0.2
23	23B02	0
24	23B07	0.04
25	23B08	-0.18
26	23B09	-0.2
27	23G03	0
28	23G04	-0.1
29	23H03	-0.2
30	23H06	-0.19
31	23K05	0

Legend

- Fox Canyon Groundwater Management Agency Boundary (FCGMA 2016)
- Major Rivers/Stream Channels
- Township (North-South) and Range (East-West)
- Faults (Dashed Where Inferred)
- Oxnard Forebay

Revised Bulletin 118 Groundwater Basins and Subbasin (DWR 2018)

- Arroyo Santa Rosa Valley (4-007)
- Las Posas Valley (4-008)
- Pleasant Valley (4-006)
- Oxnard (4-004.02)

Boron change in concentration (mg/L)

- < -0.60
- -0.59 - -0.20
- -0.19 - 0.00
- 0.01 - 0.20
- 0.21 - 0.60
- > 0.60

Aquifer designation

- Well screened in the Oxnard aquifer
- Well screened in the Mugu aquifer
- Wells screened in multiple aquifers in the UAS

15P01 Abbreviated State Well Number (see notes)
10.5 Change in Concentration (mg/L)

Notes:
1) Well labels consist of an italicized abbreviated State Well Number (SWN) and change in concentration value beneath it. The change in concentration represents the difference between the 2011-2015 and 2019-2023 most recent concentrations. Maps of the 2011-2015 most recent concentration are included in the GSP.
2) SWNs are based on Township and Range in the Public Land Survey System. To construct a full SWN from the abbreviation shown on the map,concatenate the Township, Range, abbreviation, and the letter "S". Example: the SWN for the well labeled "15L01" located in Township 02N (T02N) and Range 22W (R22W) is 02N22W15L01S.
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4) The color of each well symbol represents the change in groundwater quality measured since the 2011 to 2015 period.
5) All change in concentrations are in mg/L.
6) Aquifer designation information for individual wells was provided by FCGMA, CMWD and UWCD.
7) Negative (-) values represent a decrease in concentration. Positive (+) values represent an increase in concentration.

SOURCE: DWR, FCGMA, VCWPD, CMWD, UWCD

FIGURE 2-47
Change in Boron Concentration (mg/L) in the UAS between 2011-2015 and 2019-2023

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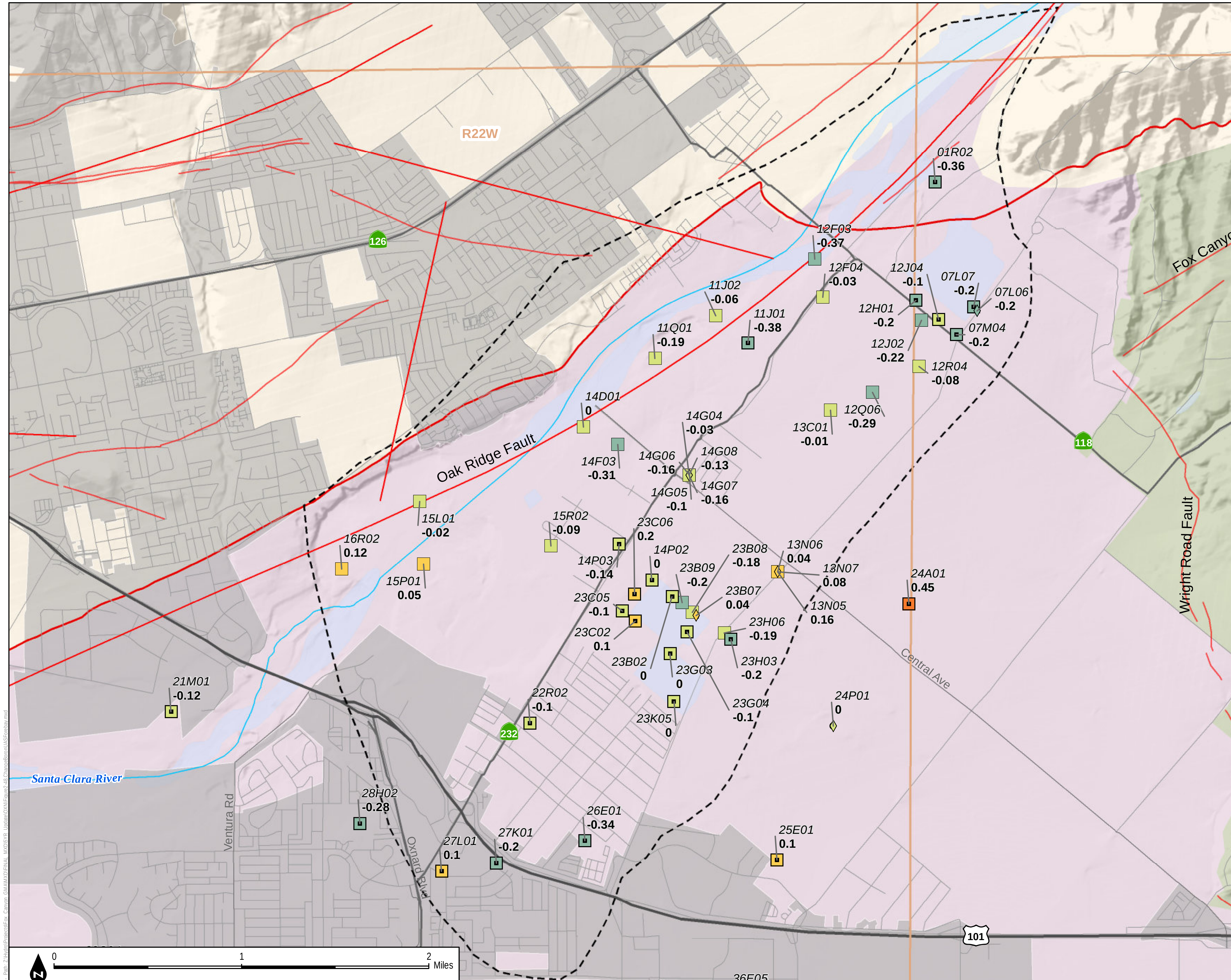

Legend

Fox Canyon Groundwater Management Agency Boundary (FCGMA 2016)
Major Rivers/Stream Channels
Township (North-South) and Range (East-West)
Faults (Dashed Where Inferred)
Oxnard Forebay

Revised Bulletin 118 Groundwater Basins and Subbasin (DWR 2018)

Las Posas Valley (4-008)
Pleasant Valley (4-006)
Oxnard (4-004.02)

Boron change in concentration (mg/L)

< -0.60
-0.59 - -0.20
-0.19 - 0.00
0.01 - 0.20
0.21 - 0.60
> 0.60

Aquifer designation

Well screened in the Oxnard aquifer
Well screened in the Mugu aquifer
Wells screened in multiple aquifers in the UAS
15P01 Abbreviated State Well Number (see notes)
10.5 Change in Concentration (mg/L)

Notes:
1) Well labels consist of an italicized abbreviated State Well Number (SWN) and change in concentration value beneath it.
The change in concentration represents the difference between the 2011-2015 and 2019-2023 most recent concentrations.
Maps of the 2011-2015 most recent concentration are included in the GSP.
2) SWNs are based on Township and Range in the Public Land Survey System. To construct a full SWN from the abbreviation shown on the map,concatenate the Township, Range, abbreviation, and the letter "S". Example: the SWN for the well labeled "15L01" located in Township 02N (T02N) and Range 22W (R22W) is 02N22W15L01S.
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4) The color of each well symbol represents the change in groundwater quality measured since the 2011 to 2015 period.
5) All change in concentrations are in mg/L.
6) Aquifer designation information for individual wells was provided by FCGMA, CMWD and UWCD.
7) Negative (-) values represent a decrease in concentration. Positive (+) values represent an increase in concentration.

DUDEK

SOURCE: DWR, FCGMA, VCWPD, CMWD, UWCD

FIGURE 2-48

Change in Boron Concentration (mg/L) in the UAS, Forebay Area, between 2011-2015 and 2019-2023

Groundwater Sustainability Plan for the Oxnard Subbasin: First Periodic Evaluation

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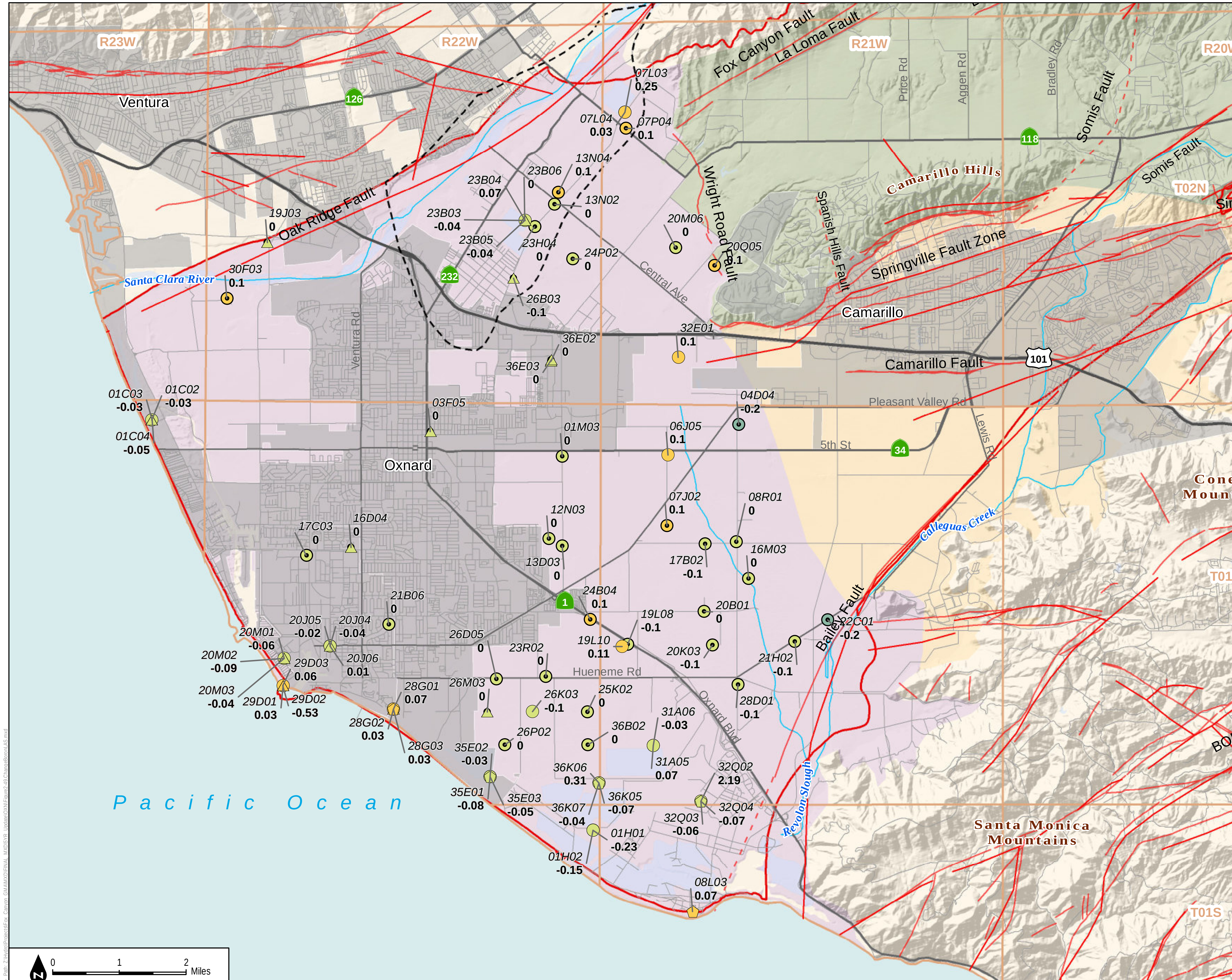

Legend

- Fox Canyon Groundwater Management Agency Boundary (FCGMA 2016)
- Major Rivers/Stream Channels
- Township (North-South) and Range (East-West)
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- Oxnard Forebay

Revised Bulletin 118 Groundwater Basins and Subbasin (DWR 2018)

- Arroyo Santa Rosa Valley (4-007)
- Las Posas Valley (4-008)
- Pleasant Valley (4-006)
- Oxnard (4-004.02)

Boron change in concentration (mg/L)

- =< -0.60
- -0.59- -0.20
- -0.19 - 0.00
- 0.01 - 0.20
- 0.21 - 0.60
- > 0.60

Aquifer designation

- Well screened in the Hueneme aquifer
- Well screened in the Fox Canyon aquifer
- Well screened in the Grimes Canyon aquifer
- Wells screened in multiple aquifers in the LAS

15P01 Abbreviated State Well Number (see notes)
10.5 Change in Concentration (mg/L)

Notes:
1) Well labels consist of an italicized abbreviated State Well Number (SWN) and change in concentration value beneath it. The change in concentration represents the difference between the 2011-2015 and 2019-2023 most recent concentrations. Maps of the 2011-2015 most recent concentration are included in the GSP.
2) SWNs are based on Township and Range in the Public Land Survey System. To construct a full SWN from the abbreviation shown on the map,concatenate the Township, Range, abbreviation, and the letter "S". Example: the SWN for the well labeled "15L01" located in Township 02N (T02N) and Range 22W (R22W) is 02N22W15L01S.
3) The shape of each well symbol correspondsto the aquifer(s) in which it is screened (see above).
4) The color of each well symbol represents the change in groundwater quality measured since the 2011 to 2015 period.
5) All change in concentrations are in mg/L.
6) Aquifer designation information for individual wells was provided by FCGMA, CMWD and UWCD.
7) Negative (-) values represent a decrease in concentration. Positive (+) values represent an increase in concentration.

DUDEK

SOURCE: DWR, FCGMA, VCWPD, CMWD, UWCD

FIGURE 2-49

Change in Boron Concentration (mg/L) in the LAS between 2011-2015 and 2019-2023

Groundwater Sustainability Plan for the Oxnard Subbasin: First Periodic Evaluation

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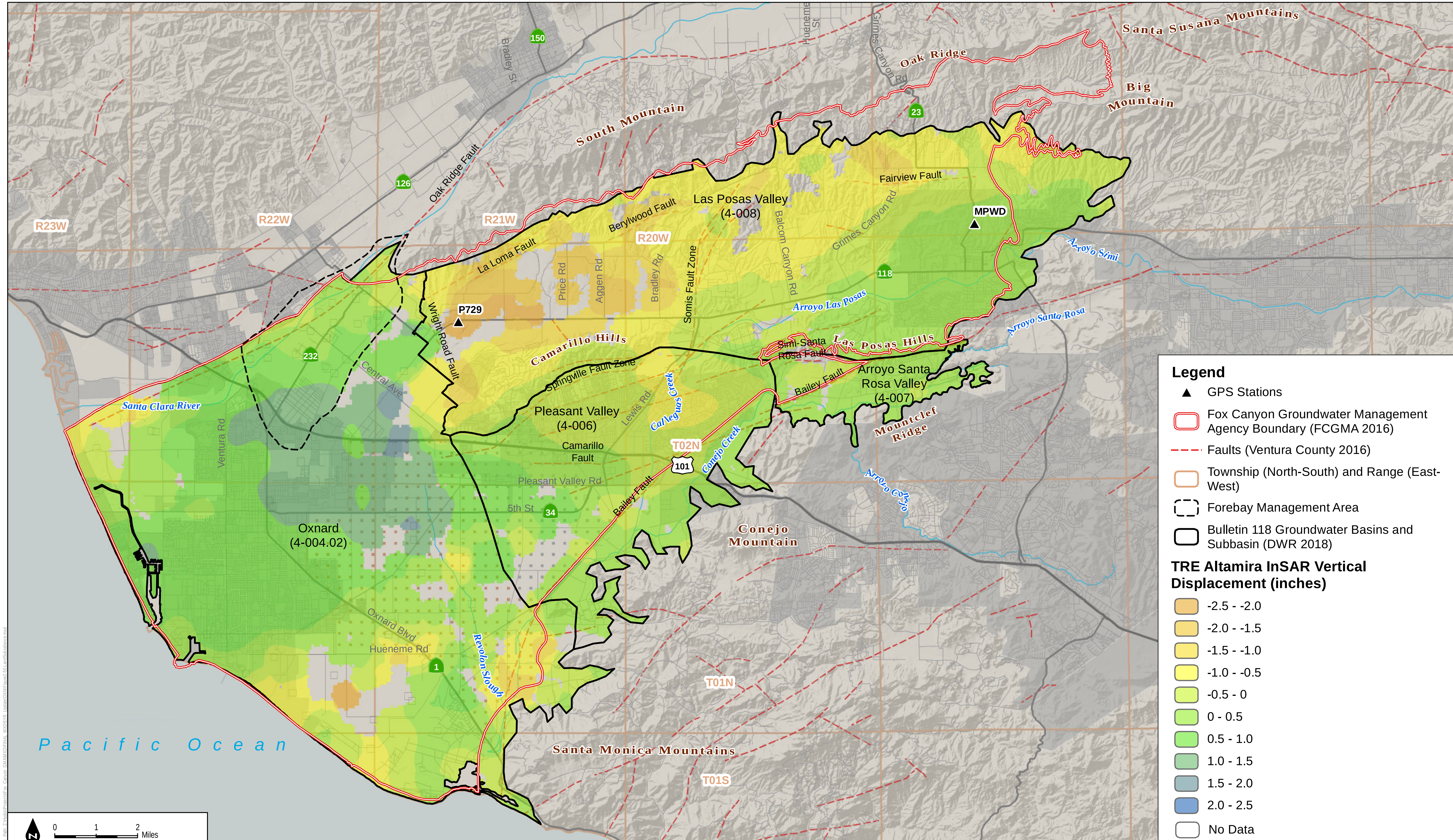

DUDEK

SOURCE: DWR; Ventura County; UWCD; CMWD

FIGURE 2-50

Land Subsidence June 2015 to January 2024

Groundwater Sustainability Plan for the Oxnard Subbasin: First Periodic Evaluation

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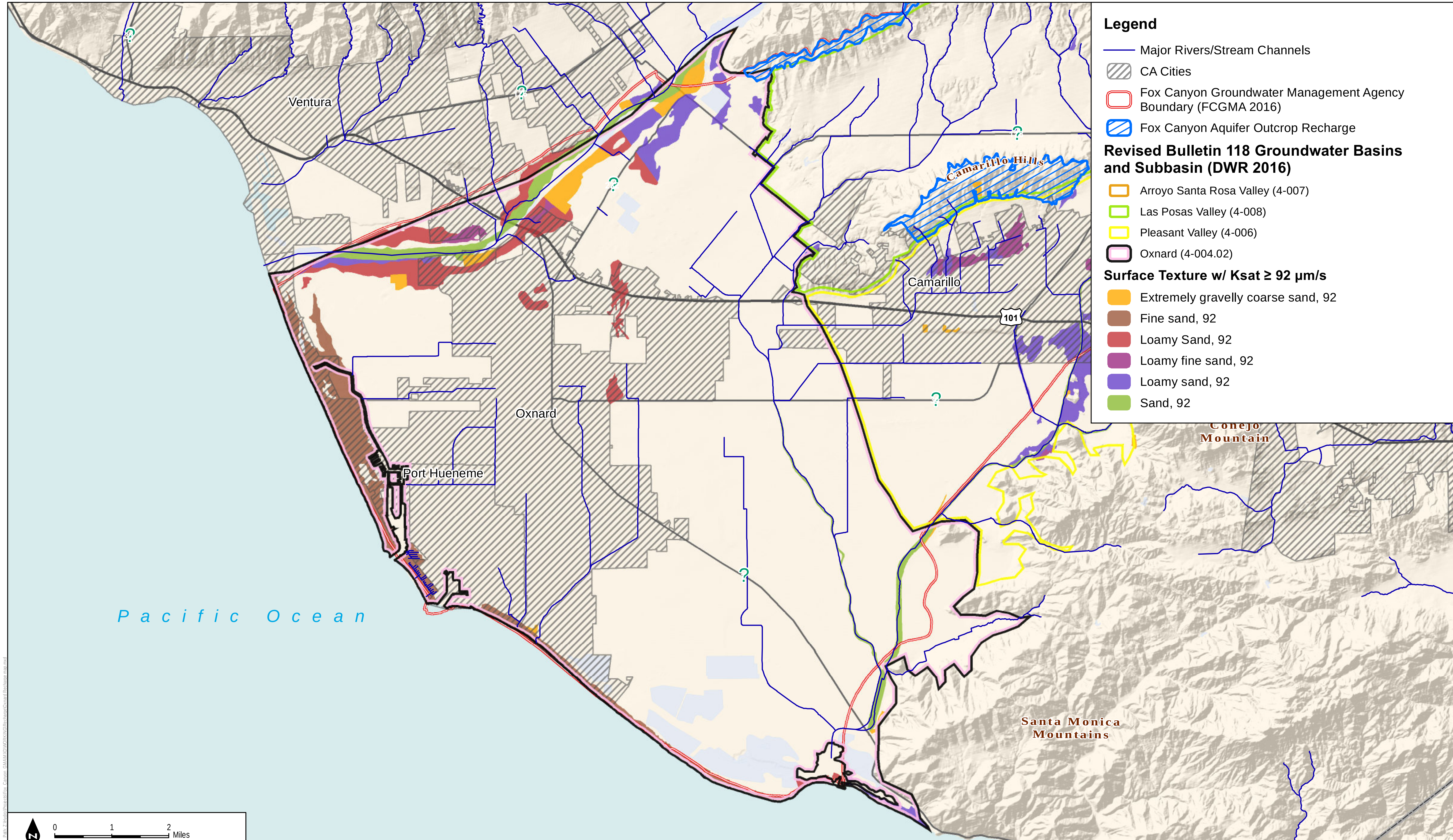

SOURCE: DWR, USGS, NRCS

Figure 4-1

Oxnard Subbasin Potential Recharge Areas

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Groundwater Sustainability Plan for the Oxnard Subbasin: First Periodic Evaluation

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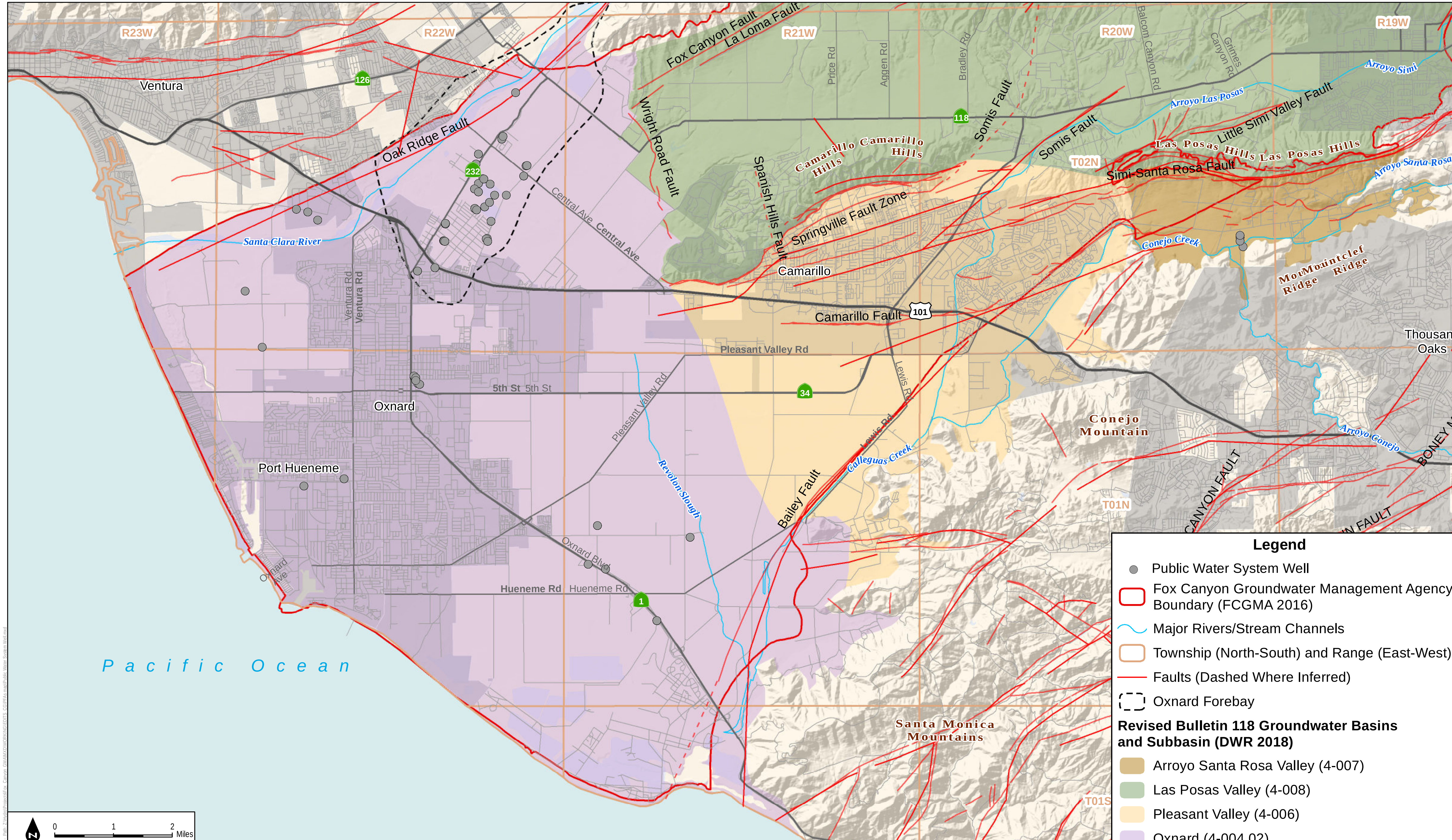

DUDEK

SOURCE: DWR, FCGMA, VCWPD, CMWD, UWCD

FIGURE 4-2

Public Water System Wells Currently Monitoring PFAS Concentrations in Groundwater

Groundwater Sustainability Plan for the Oxnard Subbasin: First Periodic Evaluation

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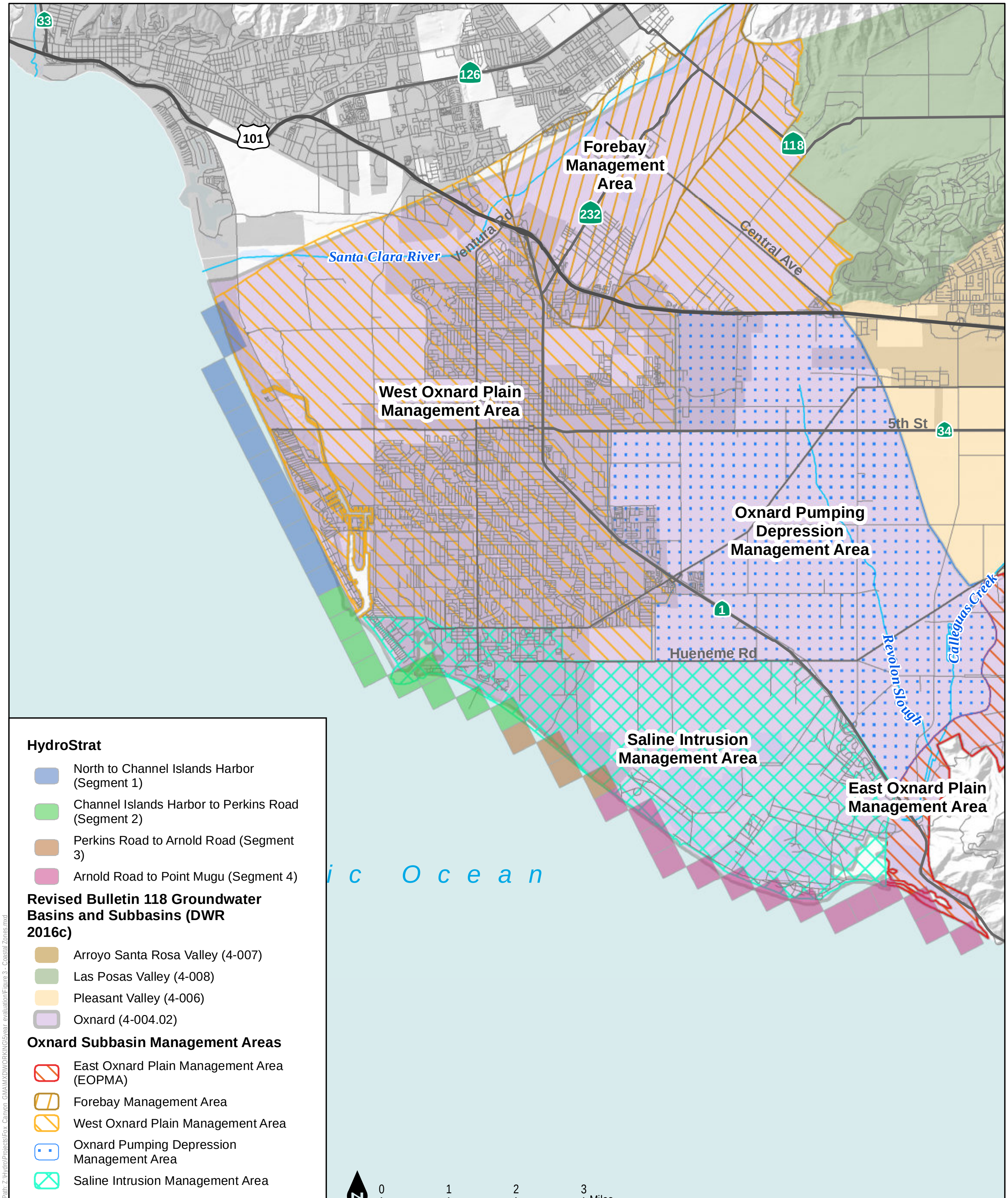

SOURCE: DWR; County of Ventura; FCGMA

FIGURE 5-1

Modeled Seawater Flux Coastal Segments

Groundwater Sustainability Plan for the Oxnard Subbasin: First Periodic Evaluation

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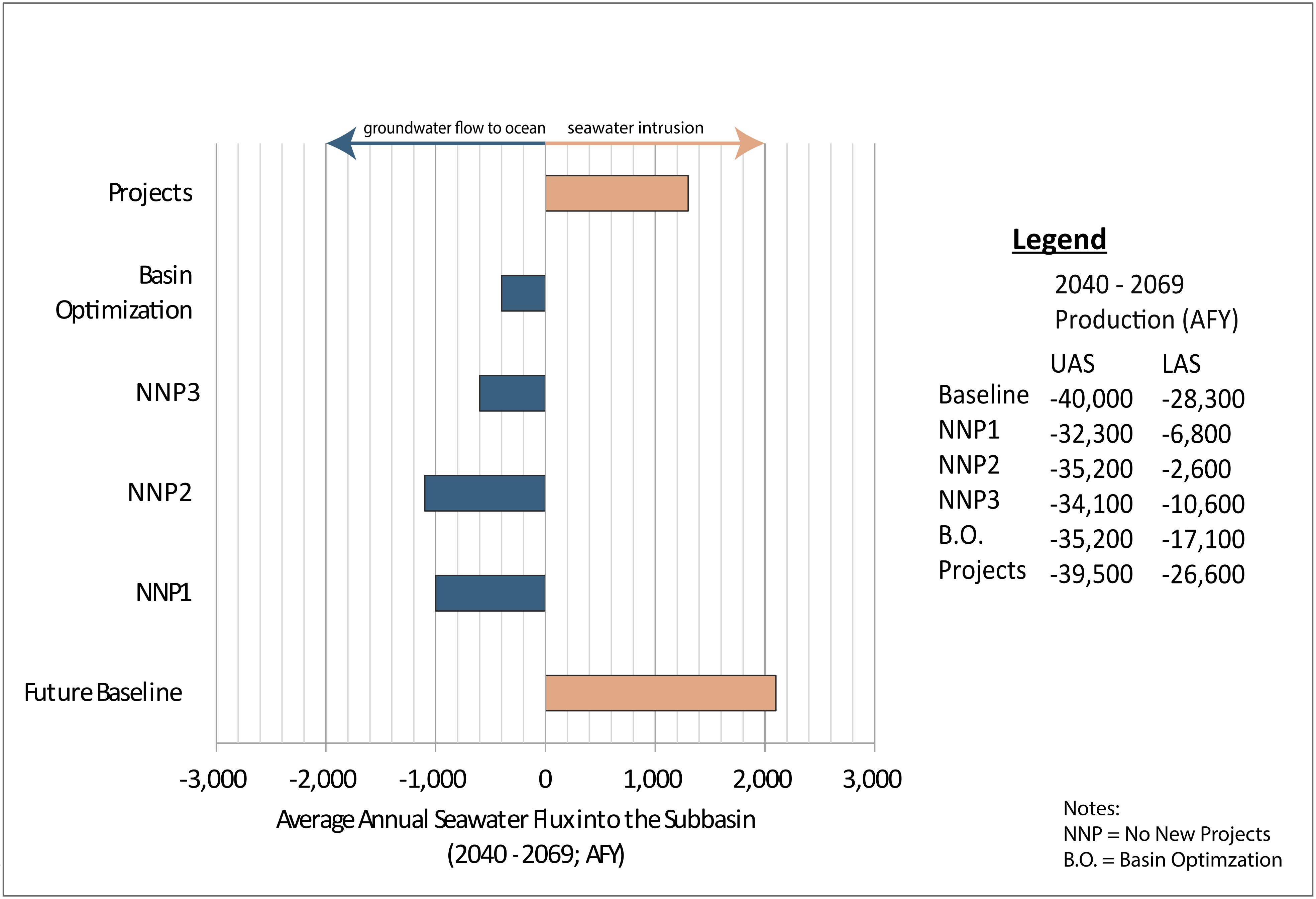

SOURCE: UWCD

FIGURE 5-2

Seawater Flux in the UAS: Future Model Scenarios without UWCD's EBB Project

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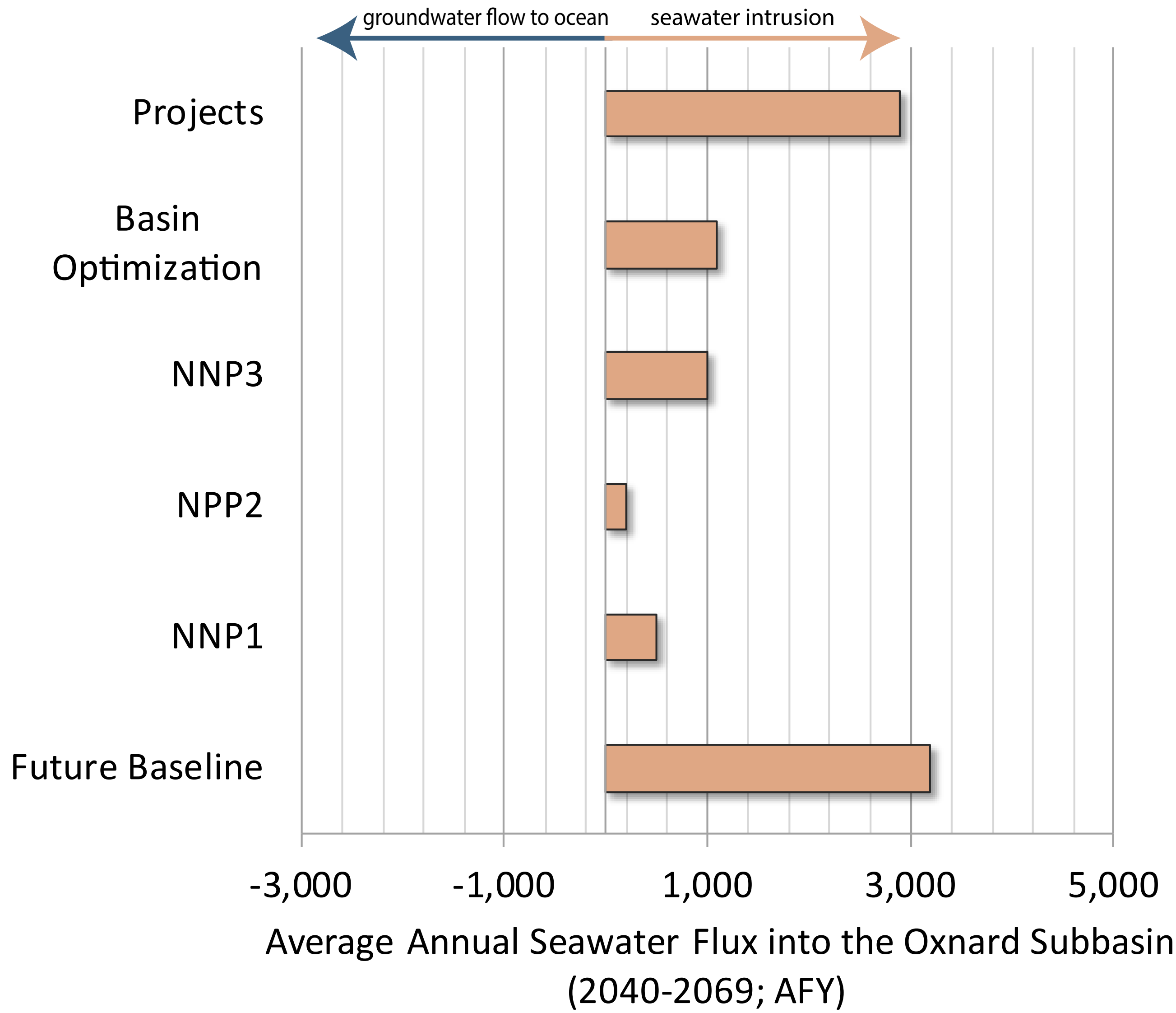

Legend

	2040 - 2069 Production (AFY) UAS	LAS
Baseline	-4,500	-10,100
NNP1	-3,100	-10,100
NNP2	-3,200	-10,800
NNP3	-3,300	-10,100
B.O.	-3,600	-10,200
Projects	-4,100	-8,900

Notes:
NNP = No New Projects
B.O. = Basin Optimzation

SOURCE: UWCD

FIGURE 5-3

Seawater Flux in the LAS: Future Model Scenarios without UWCD's EBB Project

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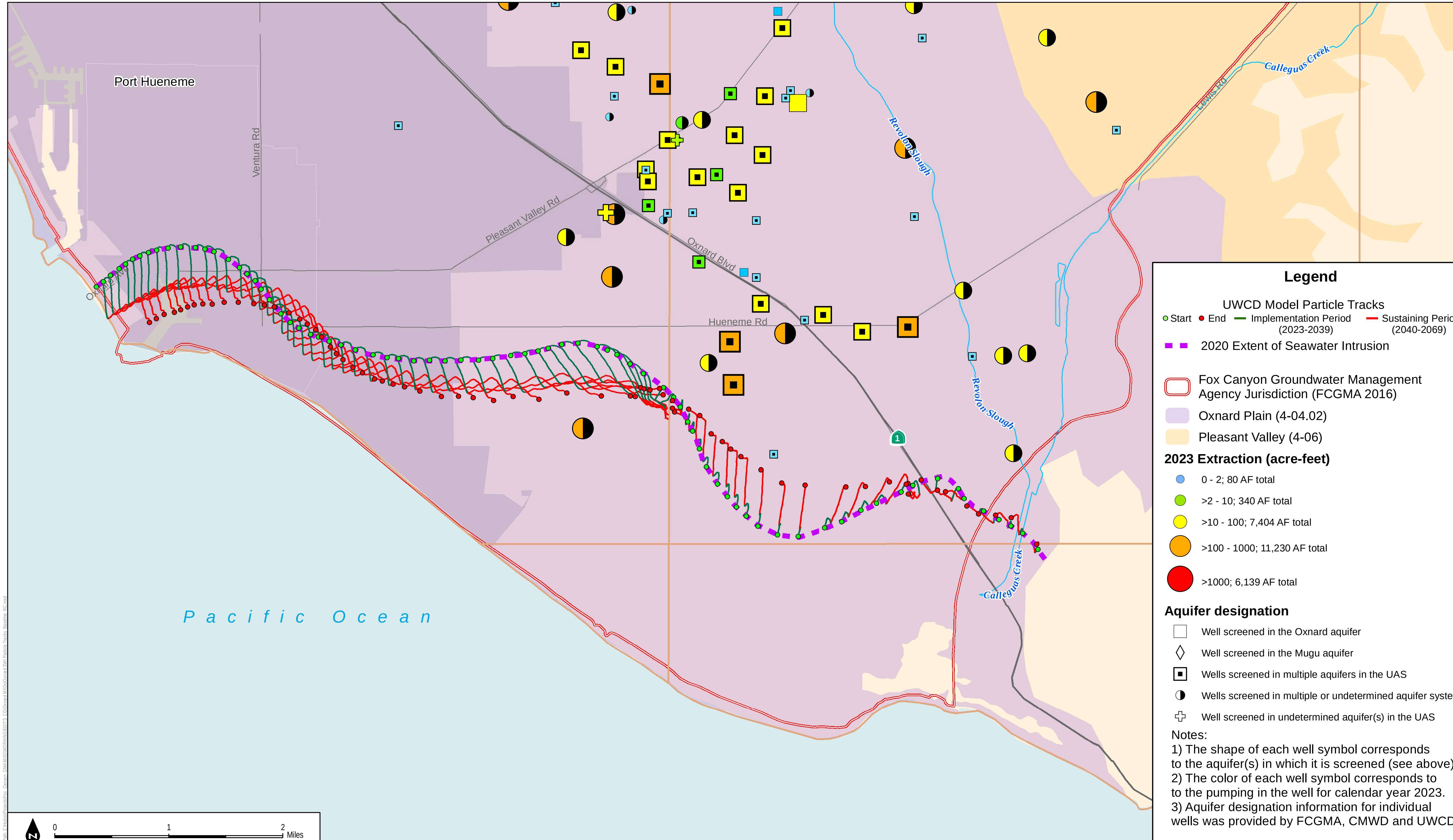

SOURCE: DWR; Ventura County; UWCD; CMWD
1930-1979 Climate Period; 2070 Climate Change Factor

Figure 5-4
UWCD Model Particle Tracks, Oxnard Aquifer, Future Baseline

DUDEK

Groundwater Sustainability Plan for the Oxnard Subbasin: First Periodic Evaluation

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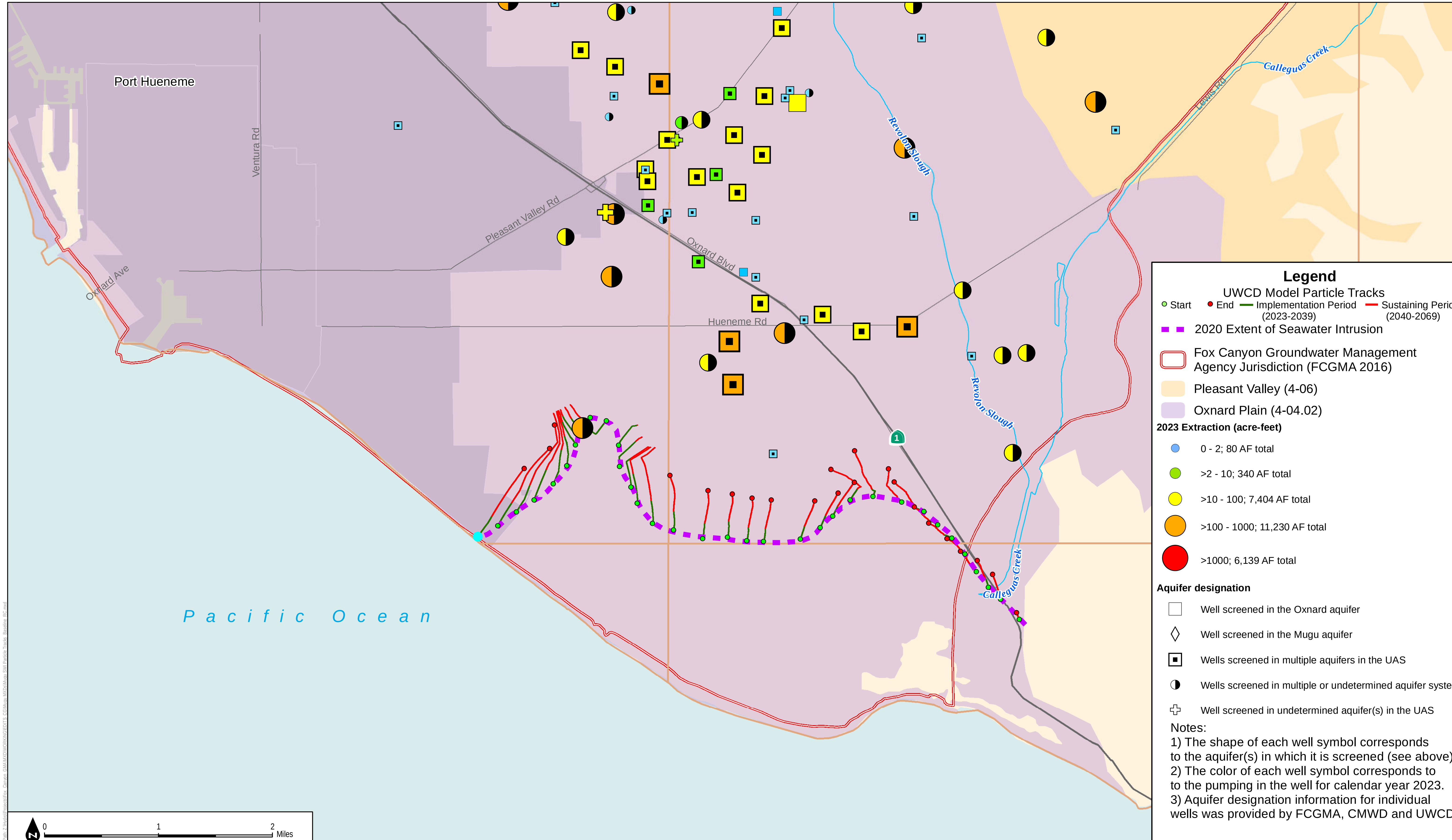

SOURCE: DWR; Ventura County; UWCD; CMWD
Climate Period 1930-1979; Climate Change Factor 2070

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Figure 5-5
UWCD Model Particle Tracks, Mugu Aquifer, Future Baseline

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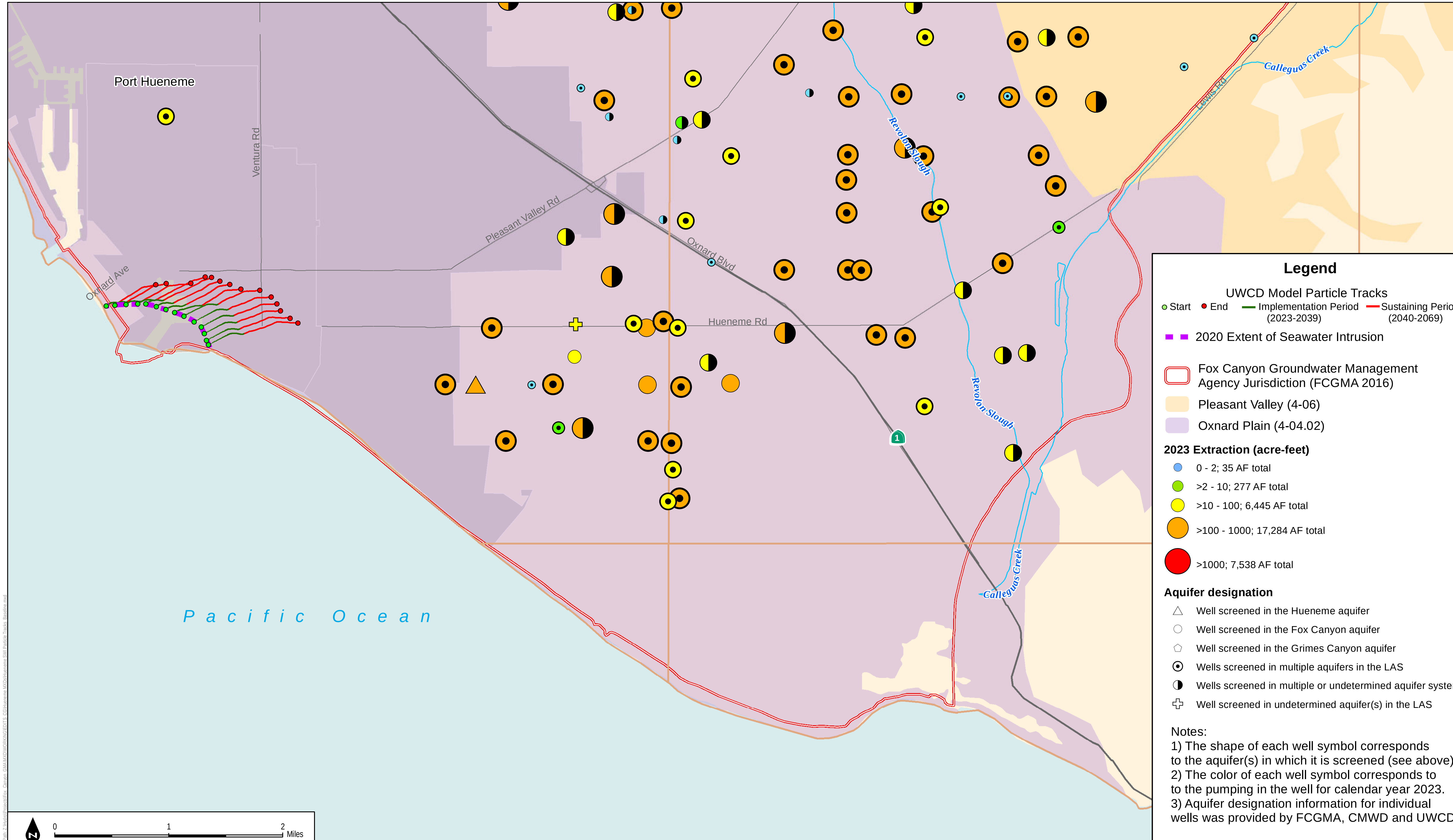

SOURCE: DWR; Ventura County; UWCD; CMWD
Climate Period 1930-1979; Climate Change Factor 2070

Figure 5-6
UWCD Model Particle Tracks, Hueneme Aquifer, Future Baseline

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Groundwater Sustainability Plan for the Oxnard Subbasin: First Periodic Evaluation

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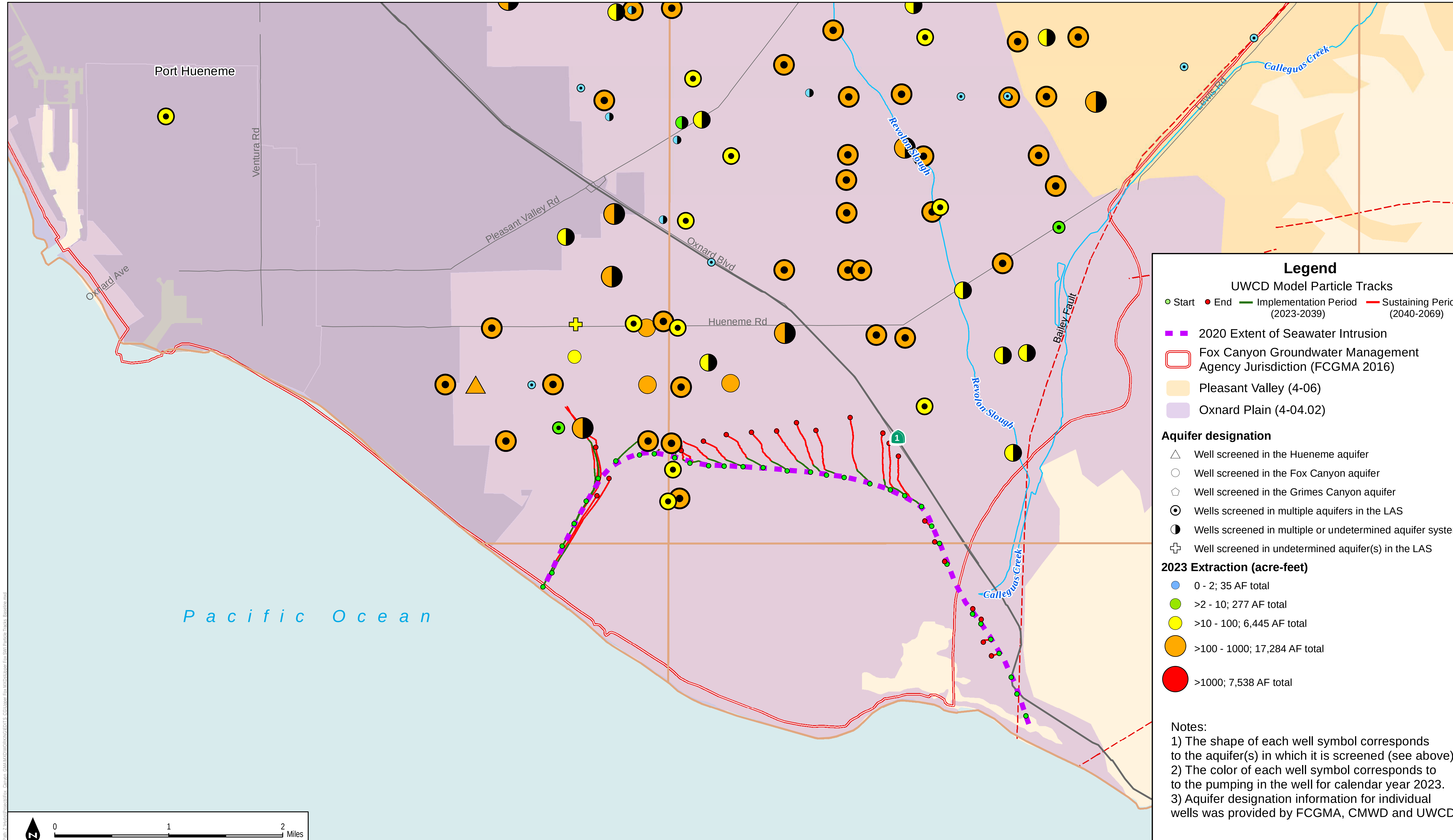

SOURCE: DWR; Ventura County; UWCD; CMWD
1930-1979 Climate Period; 2070 Climate Change Factor

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Figure 5-7
UWCD Model Particle Tracks, Upper Fox Canyon Aquifer, Future Baseline

Groundwater Sustainability Plan for the Oxnard Subbasin: First Periodic Evaluation

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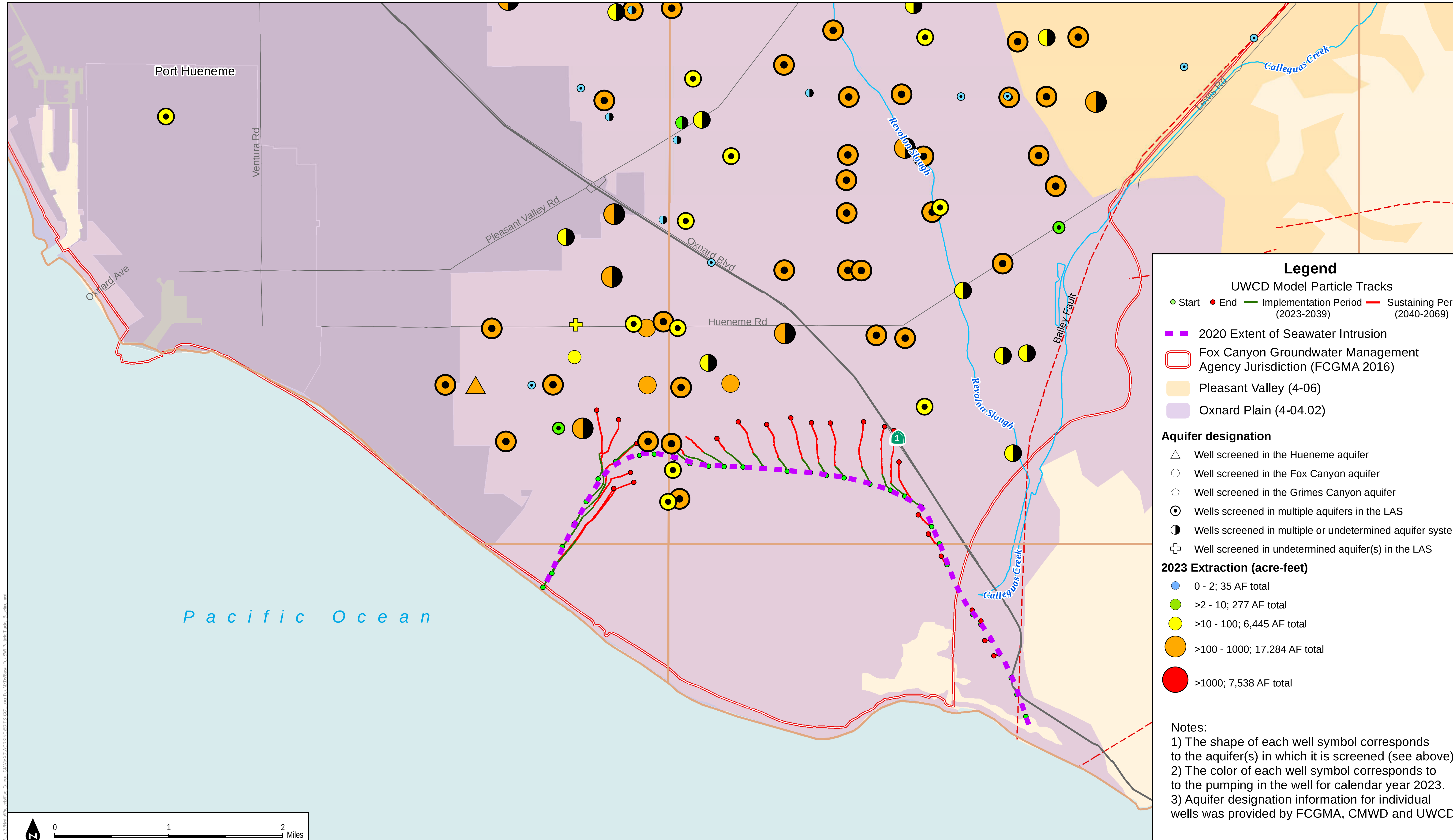

SOURCE: DWR; Ventura County; UWCD; CMWD
1930-1979 Climate Period; 2070 Climate Change Factor

DUDEK

Figure 5-8
UWCD Model Particle Tracks, Basal Fox Canyon Aquifer, Future Baseline

Groundwater Sustainability Plan for the Oxnard Subbasin: First Periodic Evaluation

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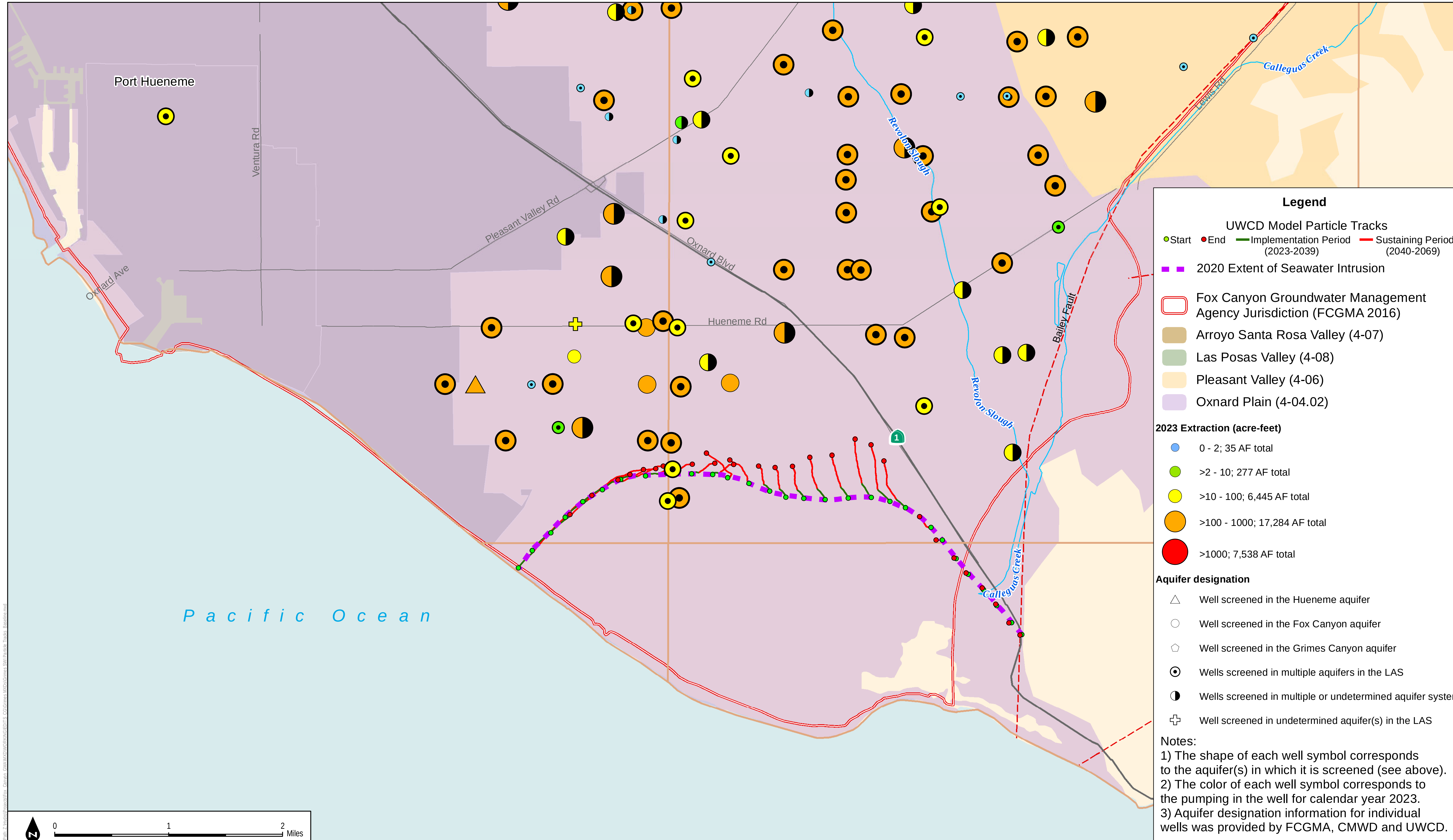

SOURCE: DWR; Ventura County; UWCD; CMWD
1930-1979 Climate Period; 2070 Climate Change Factor

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Figure 5-9
UWCD Model Particle Tracks, Grimes Canyon Aquifer, Future Baseline

Groundwater Sustainability Plan for the Oxnard Subbasin: First Periodic Evaluation

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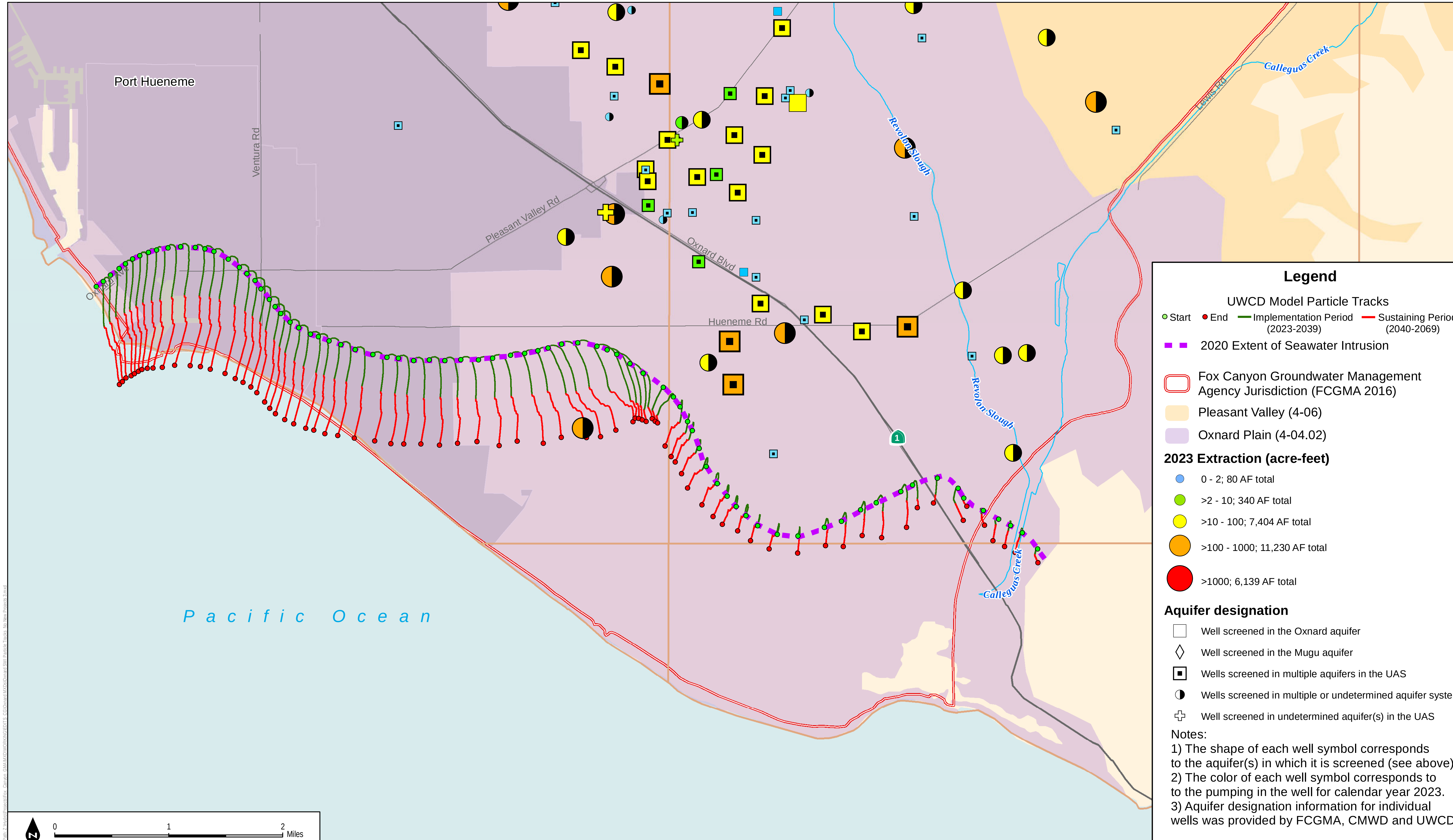

SOURCE: DWR; Ventura County; UWCD; CMWD
1930-1979 Climate Period; 2070 Climate Change Factor

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Figure 5-10
UWCD Model Particle Tracks, Oxnard Aquifer, NNP3

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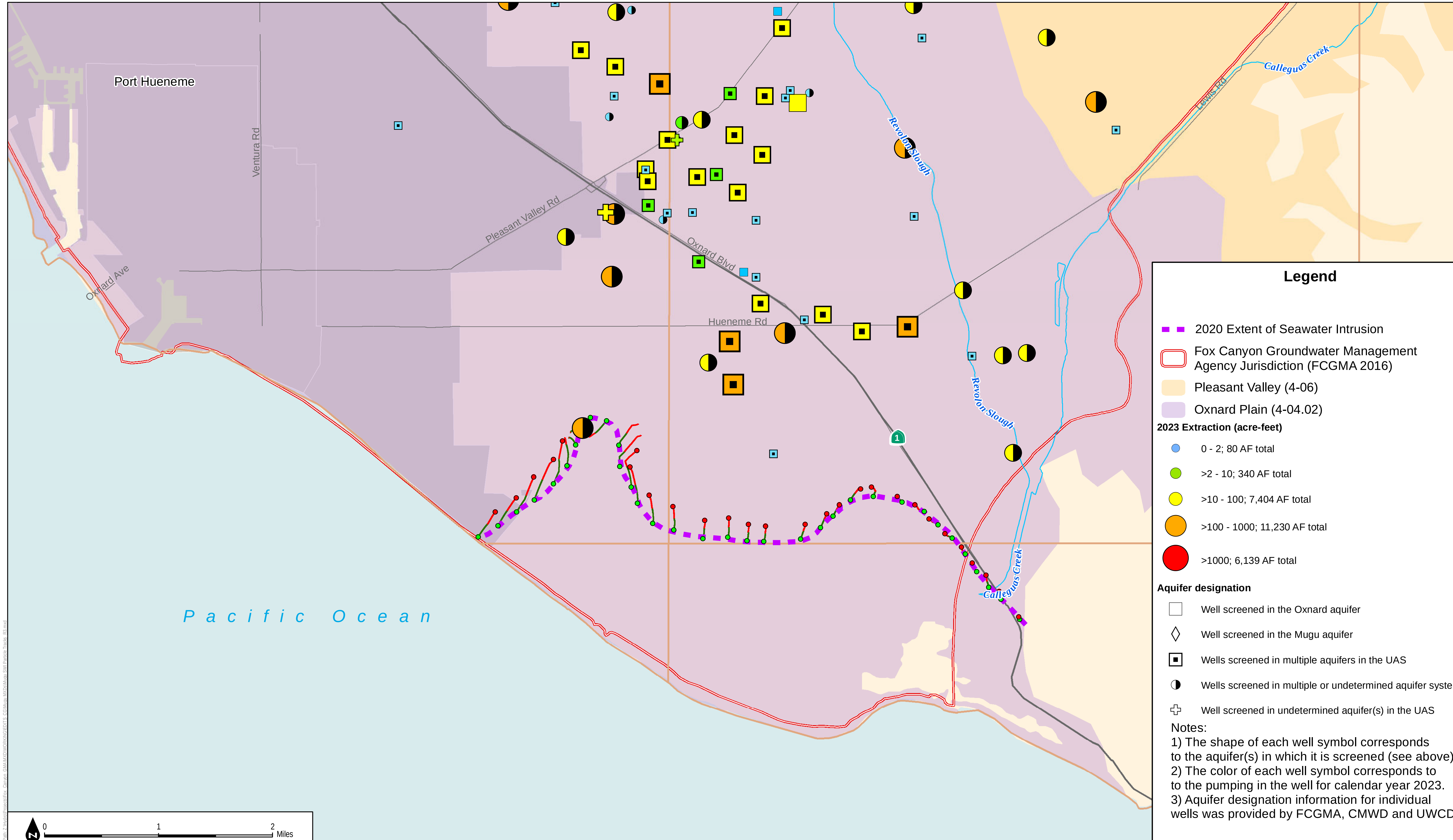

SOURCE: DWR; Ventura County; UWCD; CMWD
Climate Period 1930-1979; Climate Change Factor 2070

DUDEK

Figure 5-11
UWCD Model Particle Tracks, Mugu Aquifer, NNP3

Groundwater Sustainability Plan for the Oxnard Subbasin: First Periodic Evaluation

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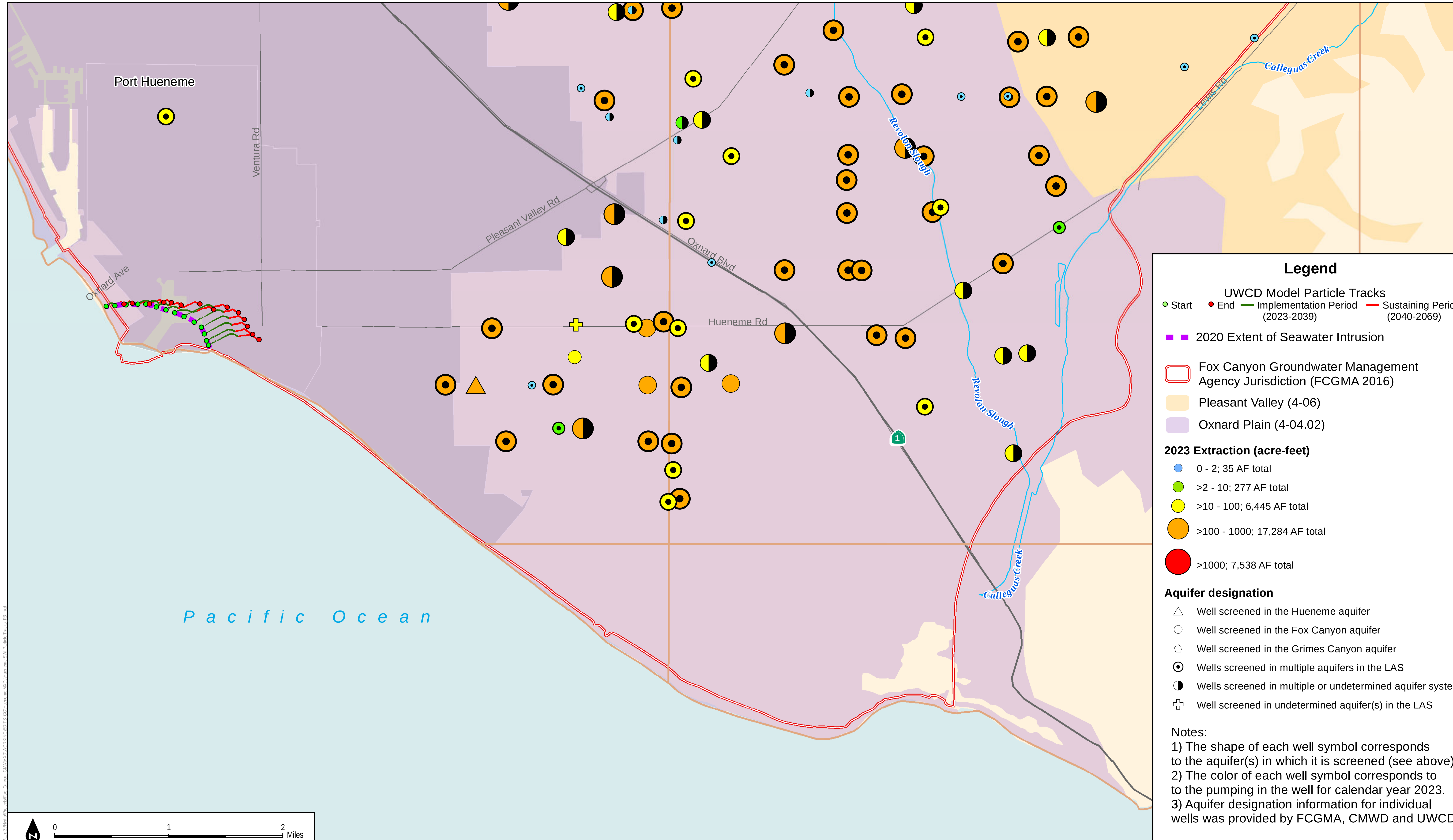

SOURCE: DWR; Ventura County; UWCD; CMWD
Climate Period 1930-1979; Climate Change Factor 2070

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Figure 5-12
UWCD Model Particle Tracks, Hueneme Aquifer, NNP3

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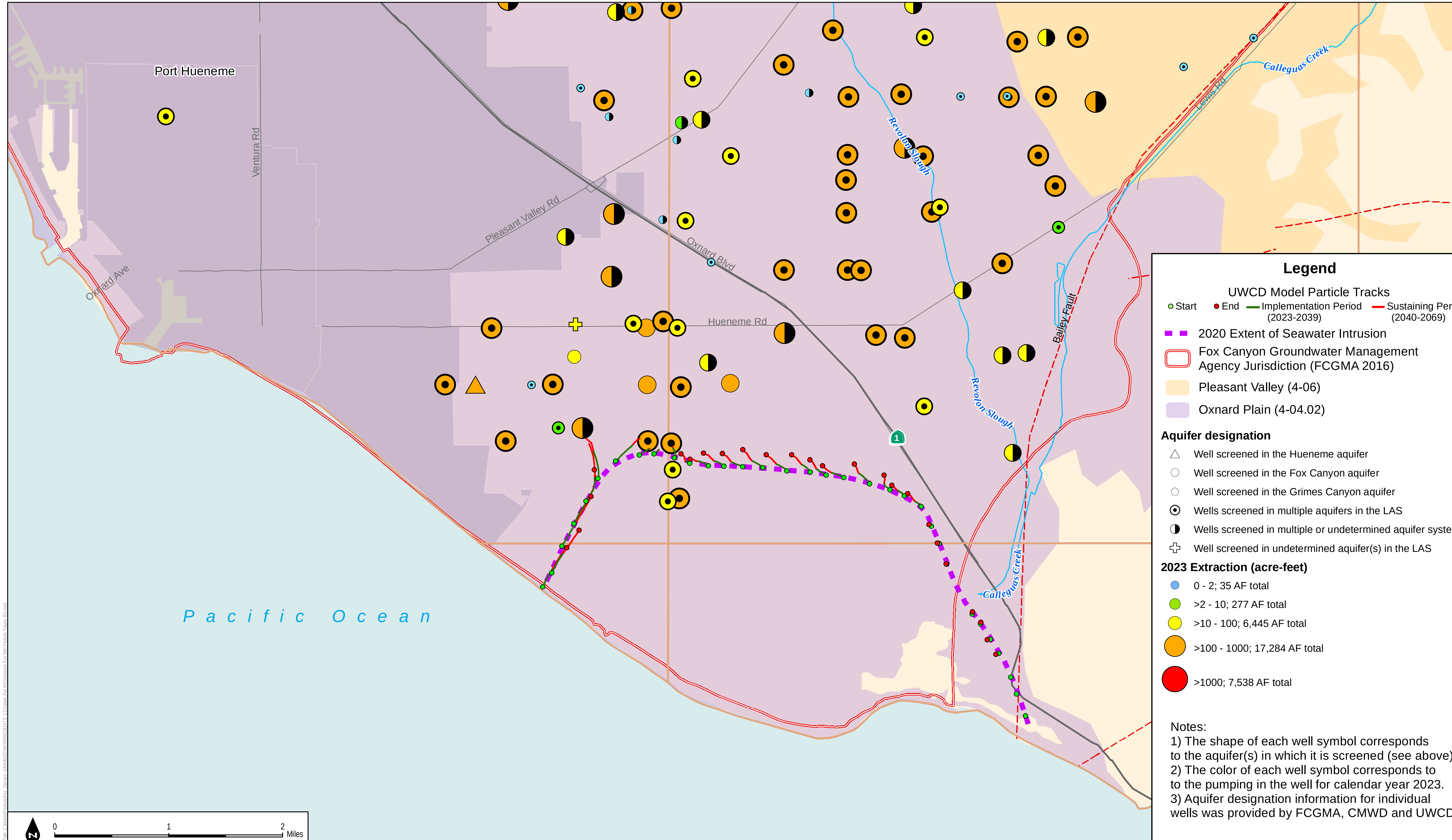

SOURCE: DWR; Ventura County; UWCD; CMWD
1930-1979 Climate Period; 2070 Climate Change Factor

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Figure 5-13
UWCD Model Particle Tracks, Upper Fox Canyon Aquifer, NNP3

Groundwater Sustainability Plan for the Oxnard Subbasin: First Periodic Evaluation

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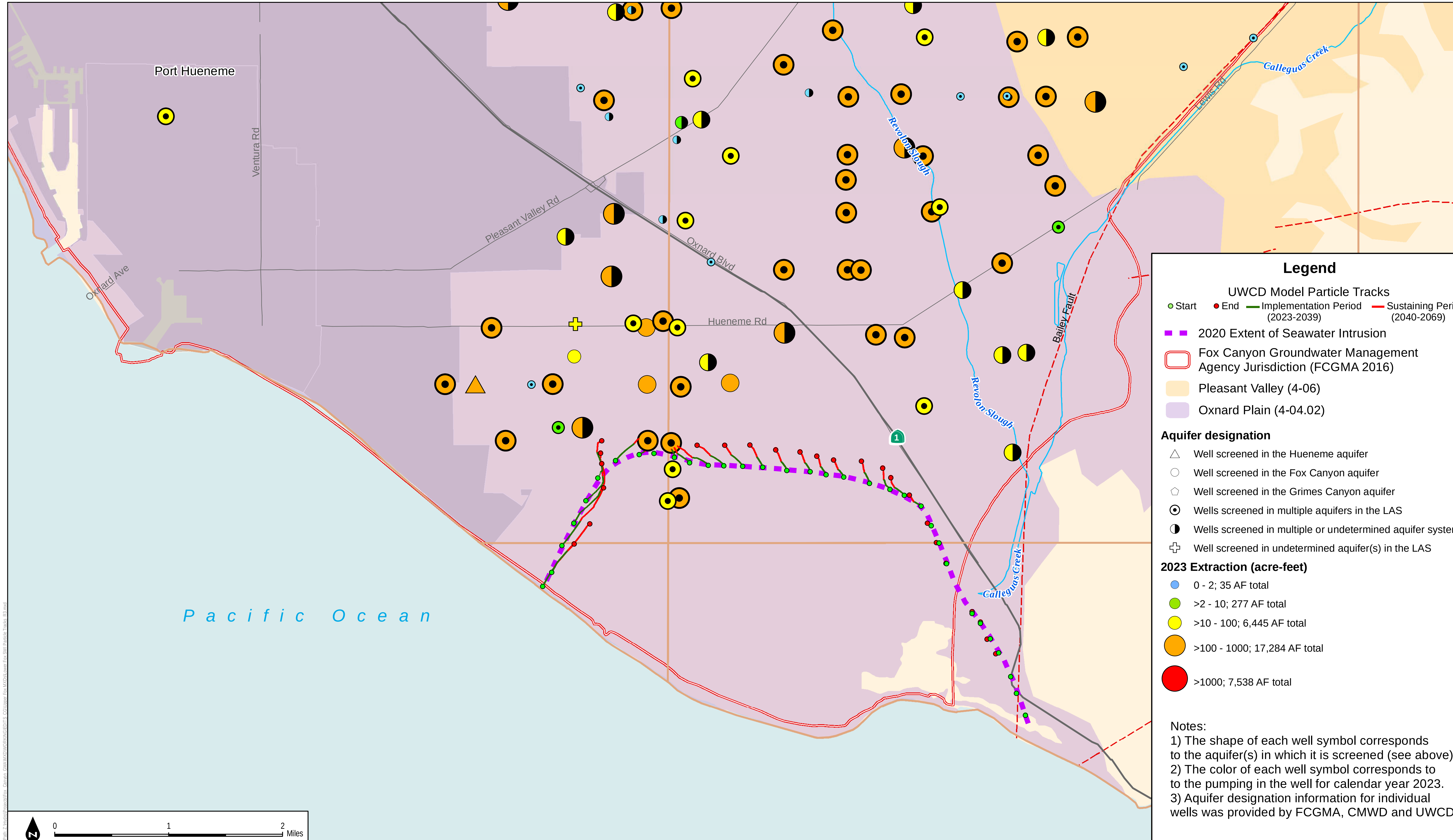

SOURCE: DWR; Ventura County; UWCD; CMWD
1930-1979 Climate Period; 2070 Climate Change Factor

DUDEK

Figure 5-14
UWCD Model Particle Tracks, Basal Fox Canyon Aquifer, NNP3

Groundwater Sustainability Plan for the Oxnard Subbasin: First Periodic Evaluation

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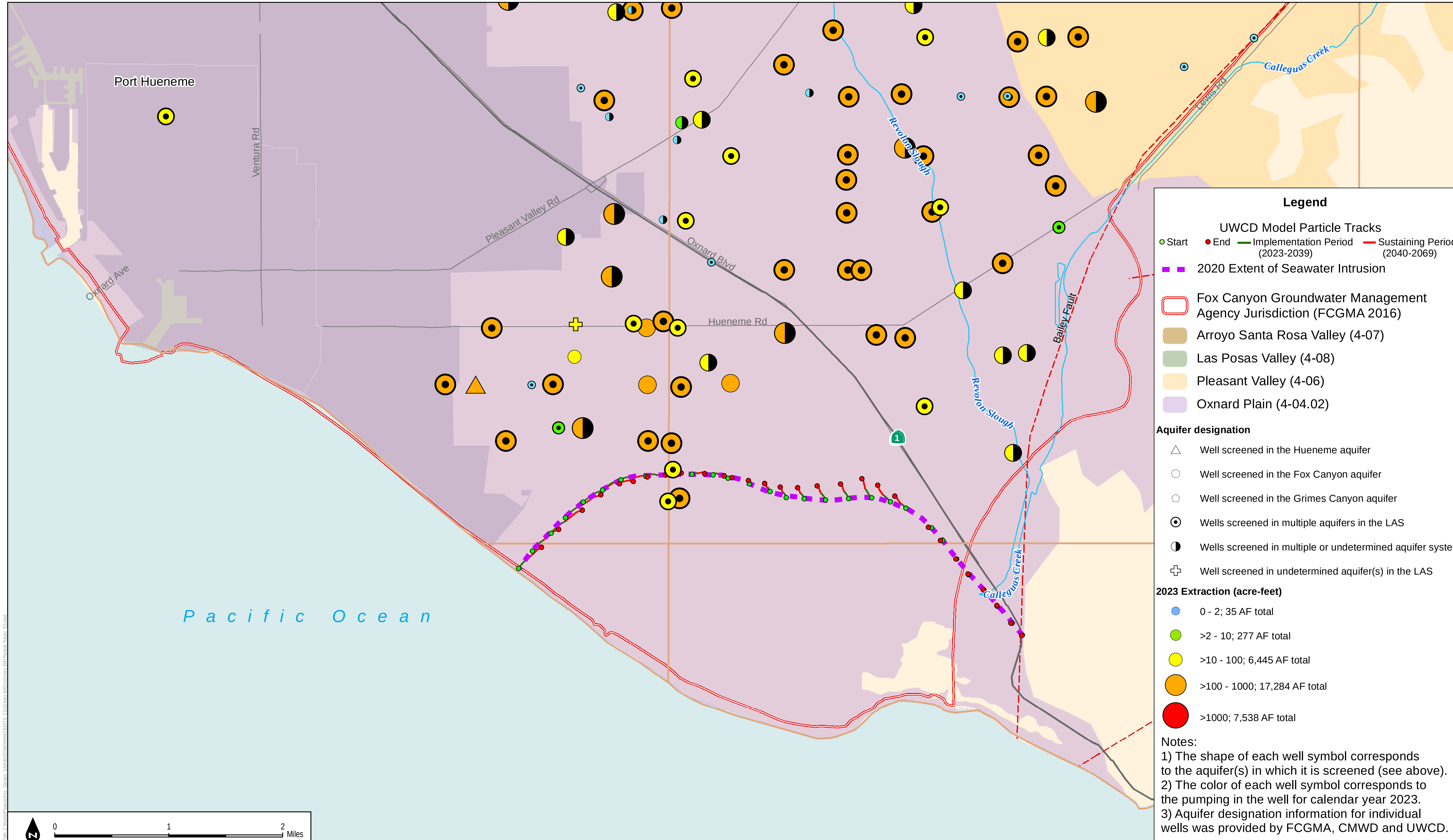

SOURCE: DWR; Ventura County; UWCD; CMWD
1930-1979 Climate Period; 2070 Climate Change Factor

DUDEK

Figure 5-15
UWCD Model Particle Tracks, Grimes Canyon Aquifer, NNP3

Groundwater Sustainability Plan for the Oxnard Subbasin: First Periodic Evaluation

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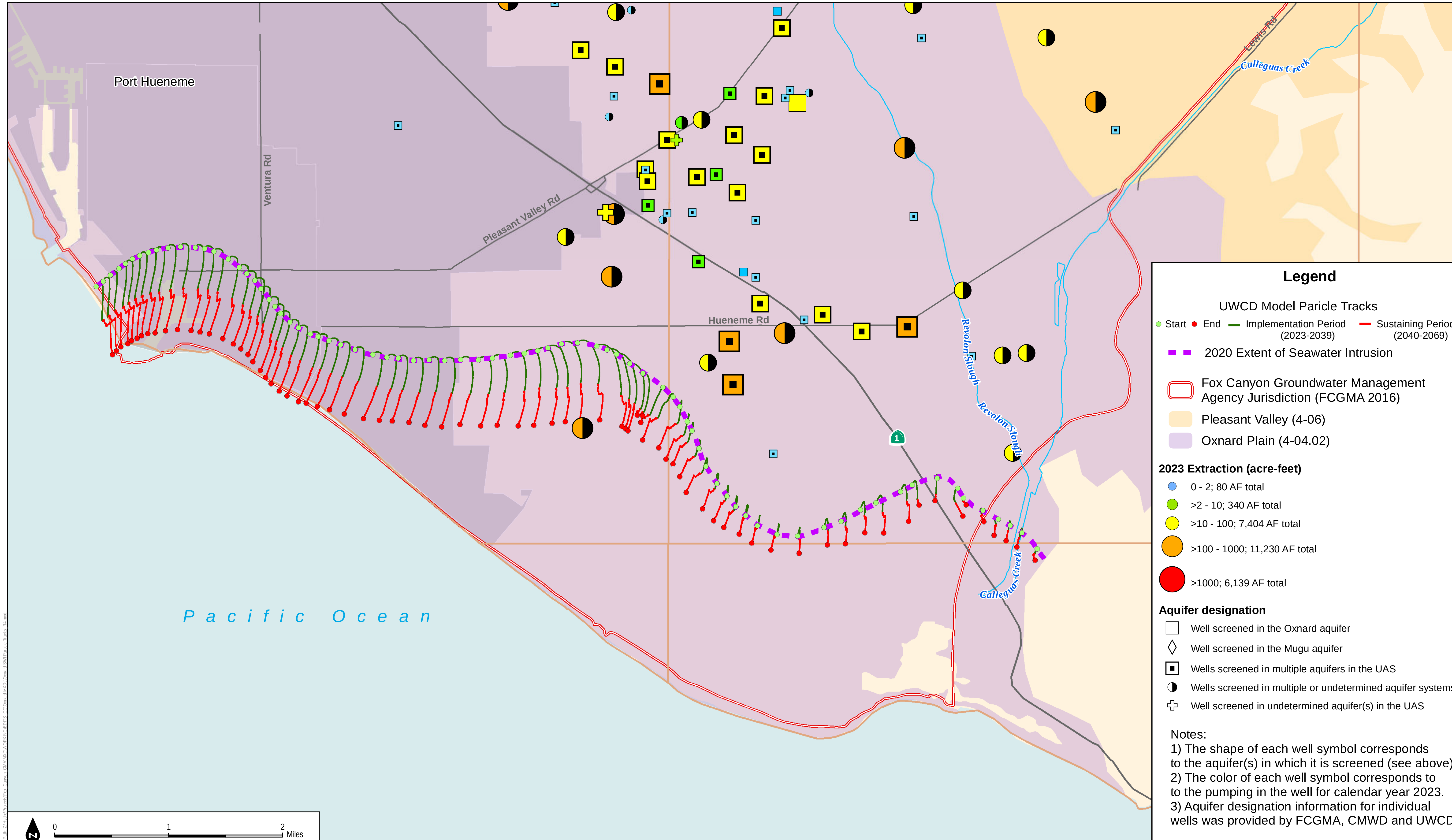

SOURCE: DWR; Ventura County; UWCD; CMWD
1930-1979 Climate Period; 2070 Climate Change Factor

DUDEK

Figure 5-16
UWCD Model Particle Tracks, Oxnard Aquifer, Basin Optimization

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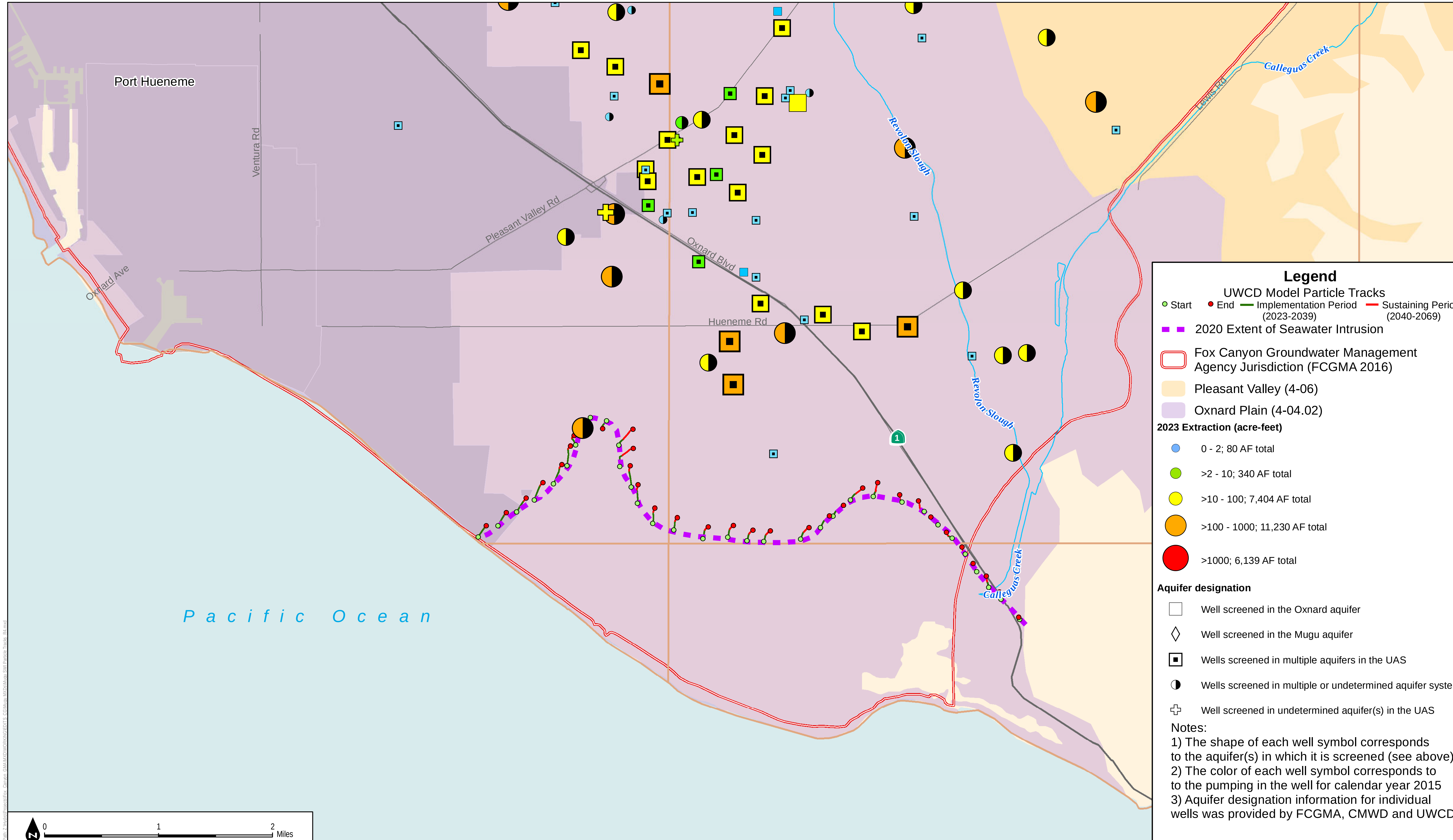

DUDEK

SOURCE: DWR; Ventura County; UWCD; CMWD
Climate Period 1930-1979; Climate Change Factor 2070

Figure 5-17
UWCD Model Particle Tracks, Mugu Aquifer, Basin Optimization

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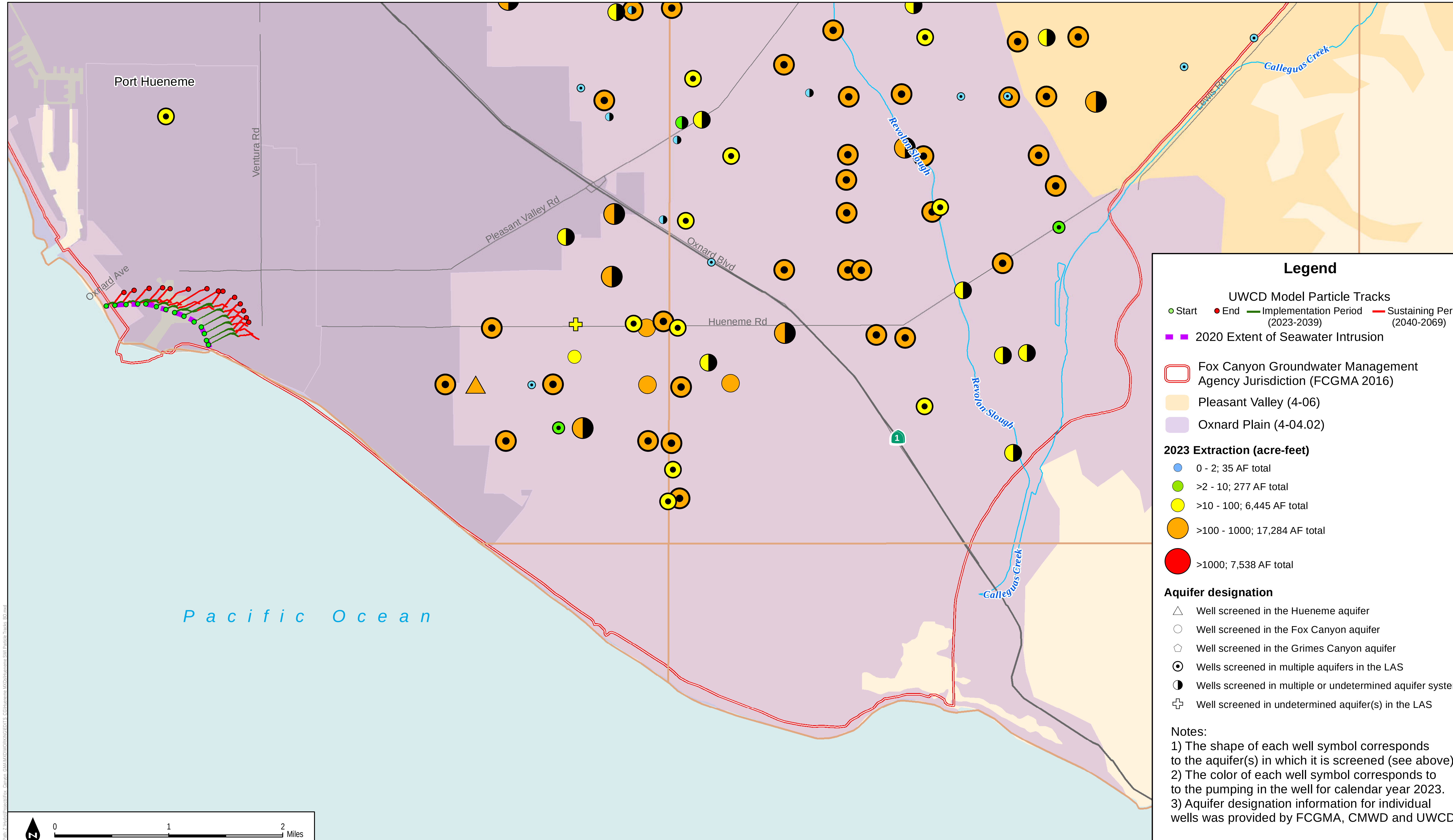

SOURCE: DWR; Ventura County; UWCD; CMWD
Climate Period 1930-1979; Climate Change Factor 2070

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Figure 5-18
UWCD Particle Tracks, Hueneme Aquifer, Basin Optimization

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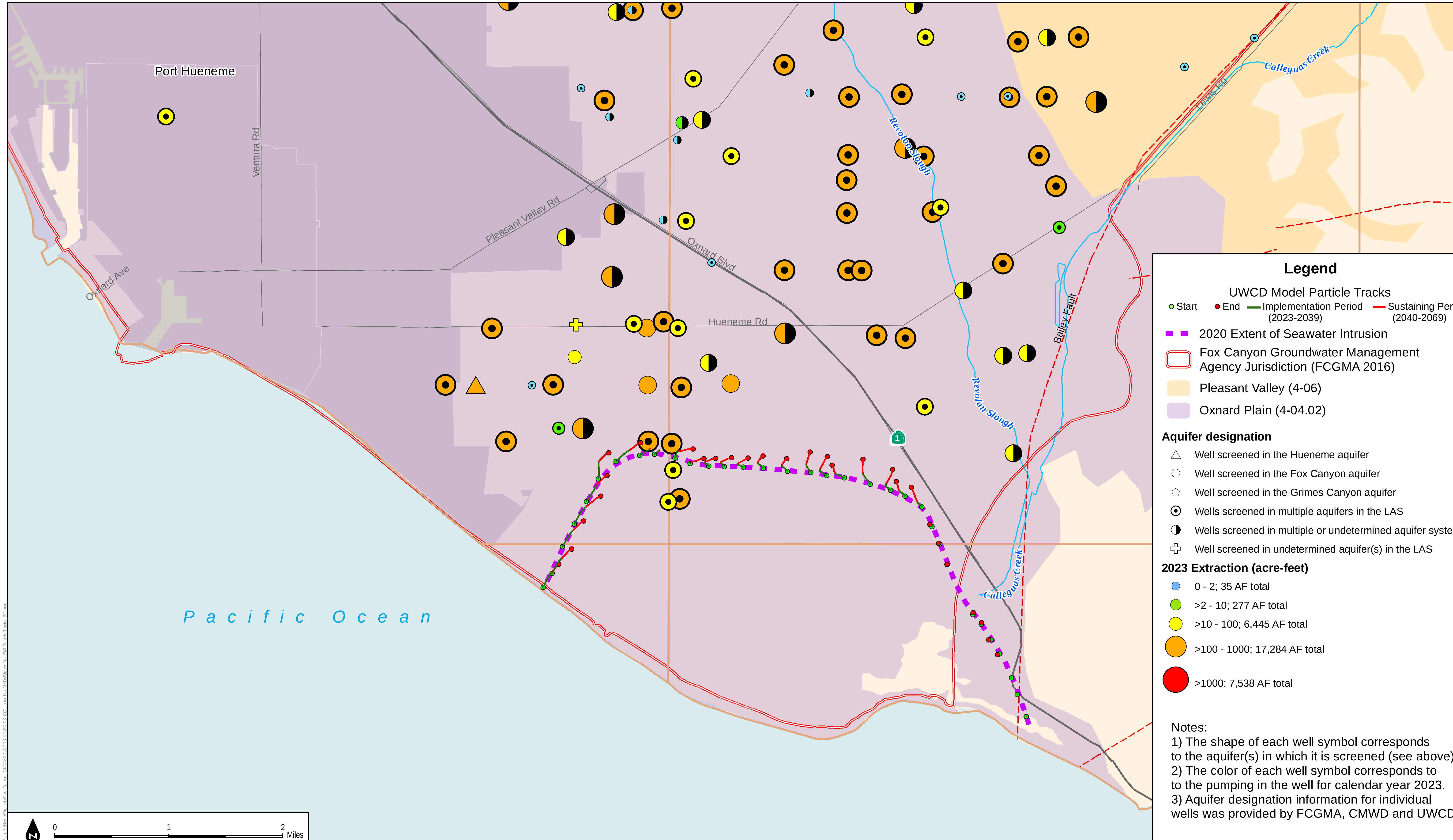

SOURCE: DWR; Ventura County; UWCD; CMWD
1930-1979 Climate Period; 2070 Climate Change Factor

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Figure 5-19
UWCD Model Particle Tracks, Upper Fox Canyon Aquifer, Basin Optimization

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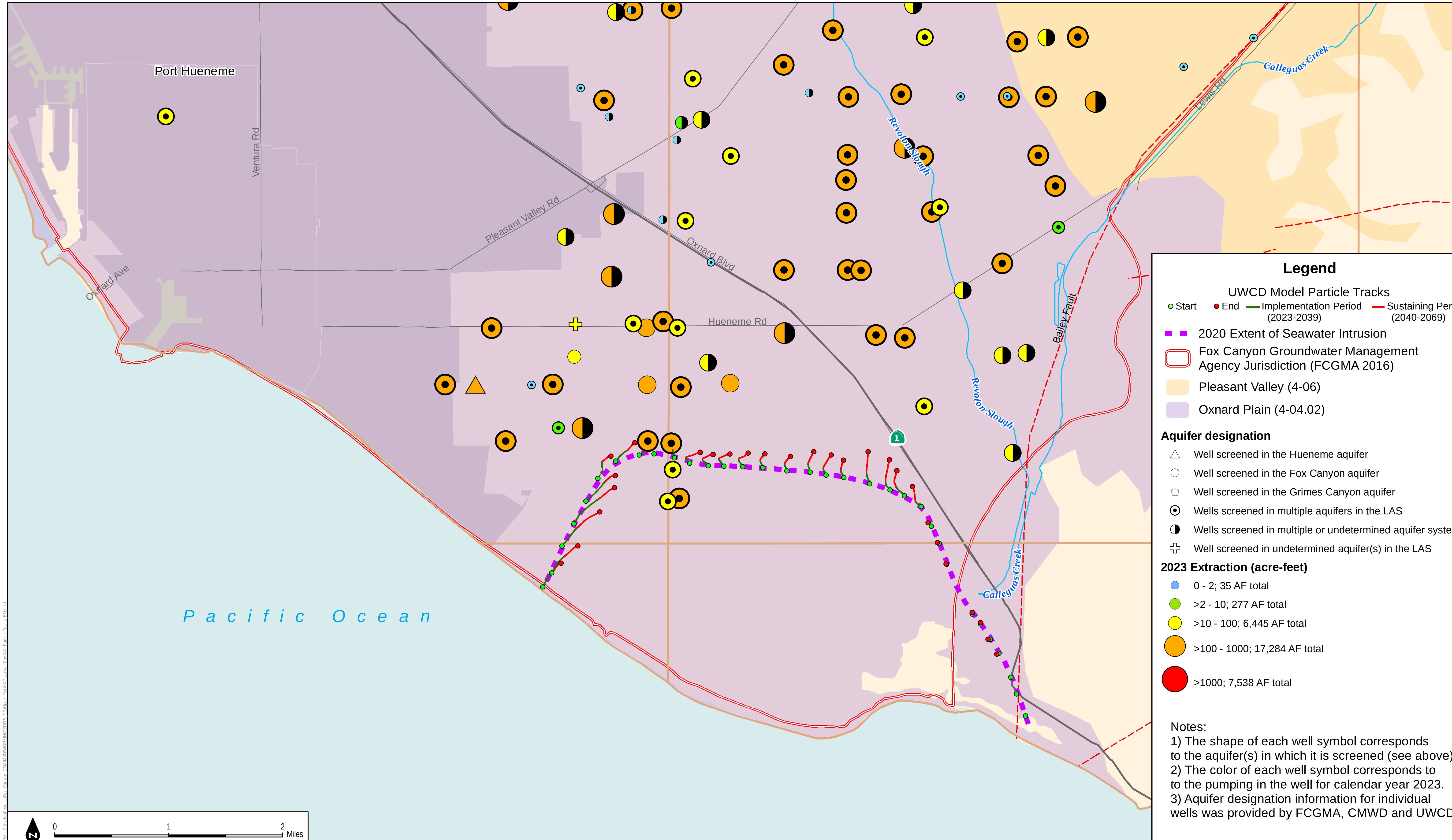

SOURCE: DWR; Ventura County; UWCD; CMWD
1930-1979 Climate Period; 2070 Climate Change Factor

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Figure 5-20
UWCD Model Particle Tracks, Basal Fox Canyon Aquifer, Basin Optimization

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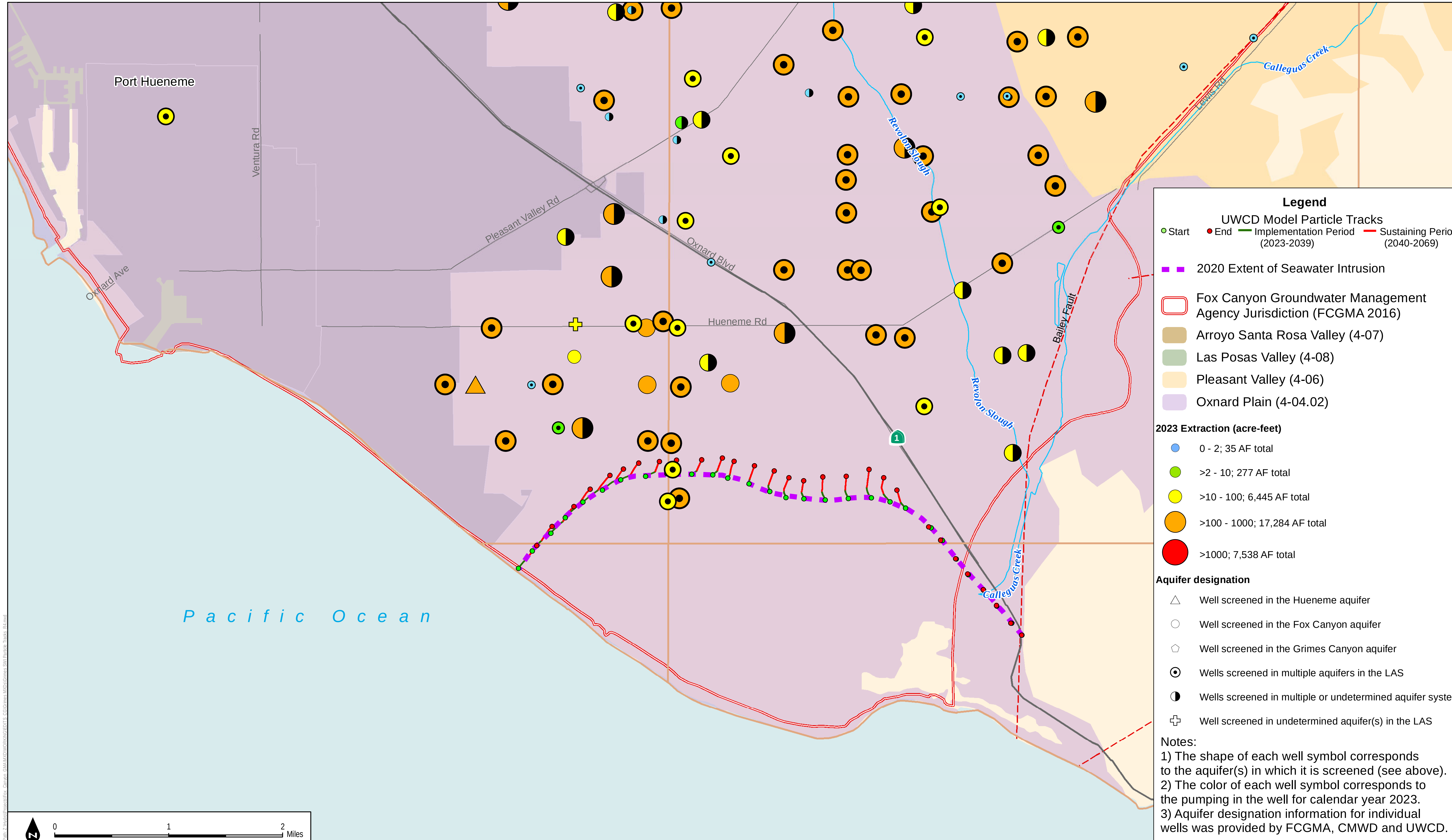

DUDEK

SOURCE: DWR; Ventura County; UWCD; CMWD
1930-1979 Climate Period; 2070 Climate Change Factor

Figure 5-21
UWCD Model Particle Tracks, Grimes Canyon Aquifer, Basin Optimization

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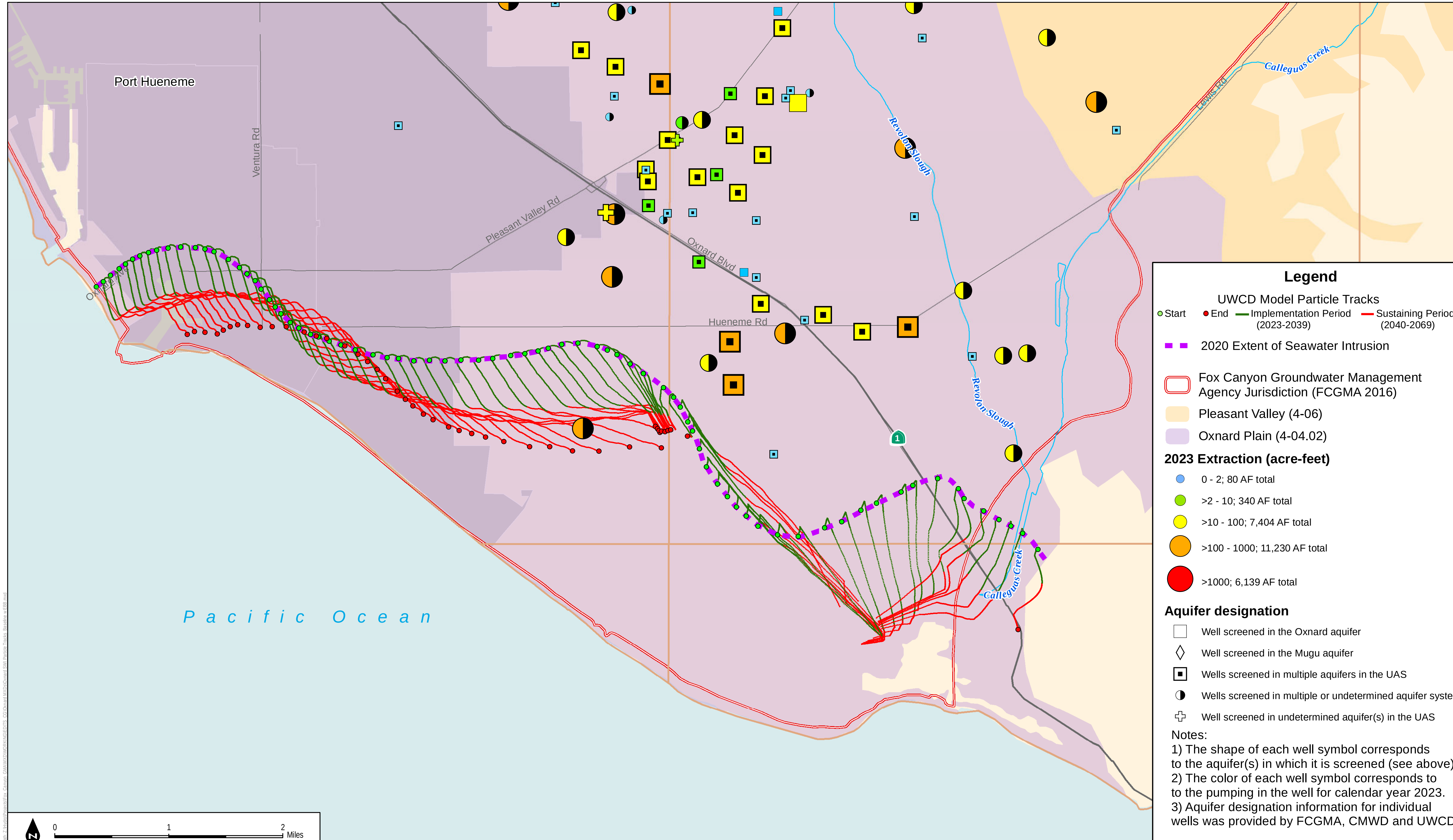

SOURCE: DWR; Ventura County; UWCD; CMWD
1930-1979 Climate Period; 2070 Climate Change Factor

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Figure 5-22
UWCD Model Particle Tracks, Oxnard Aquifer, Future Baseline with EBB

Groundwater Sustainability Plan for the Oxnard Subbasin: First Periodic Evaluation

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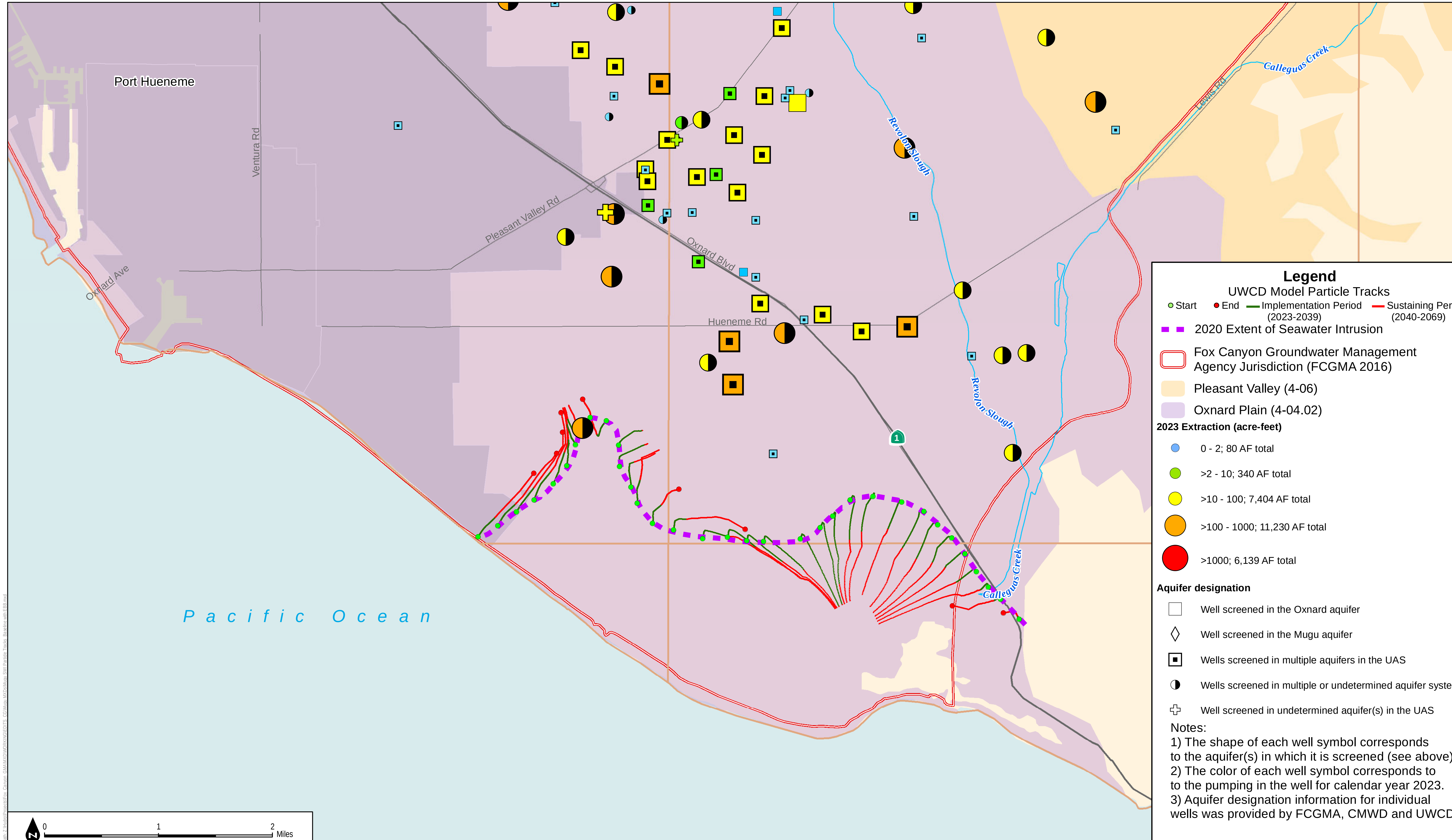

SOURCE: DWR; Ventura County; UWCD; CMWD
Climate Period 1930-1979; Climate Change Factor 2070

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Figure 5-23
UWCD Model Particle Tracks, Mugu Aquifer, Future Baseline with EBB

Groundwater Sustainability Plan for the Oxnard Subbasin: First Periodic Evaluation

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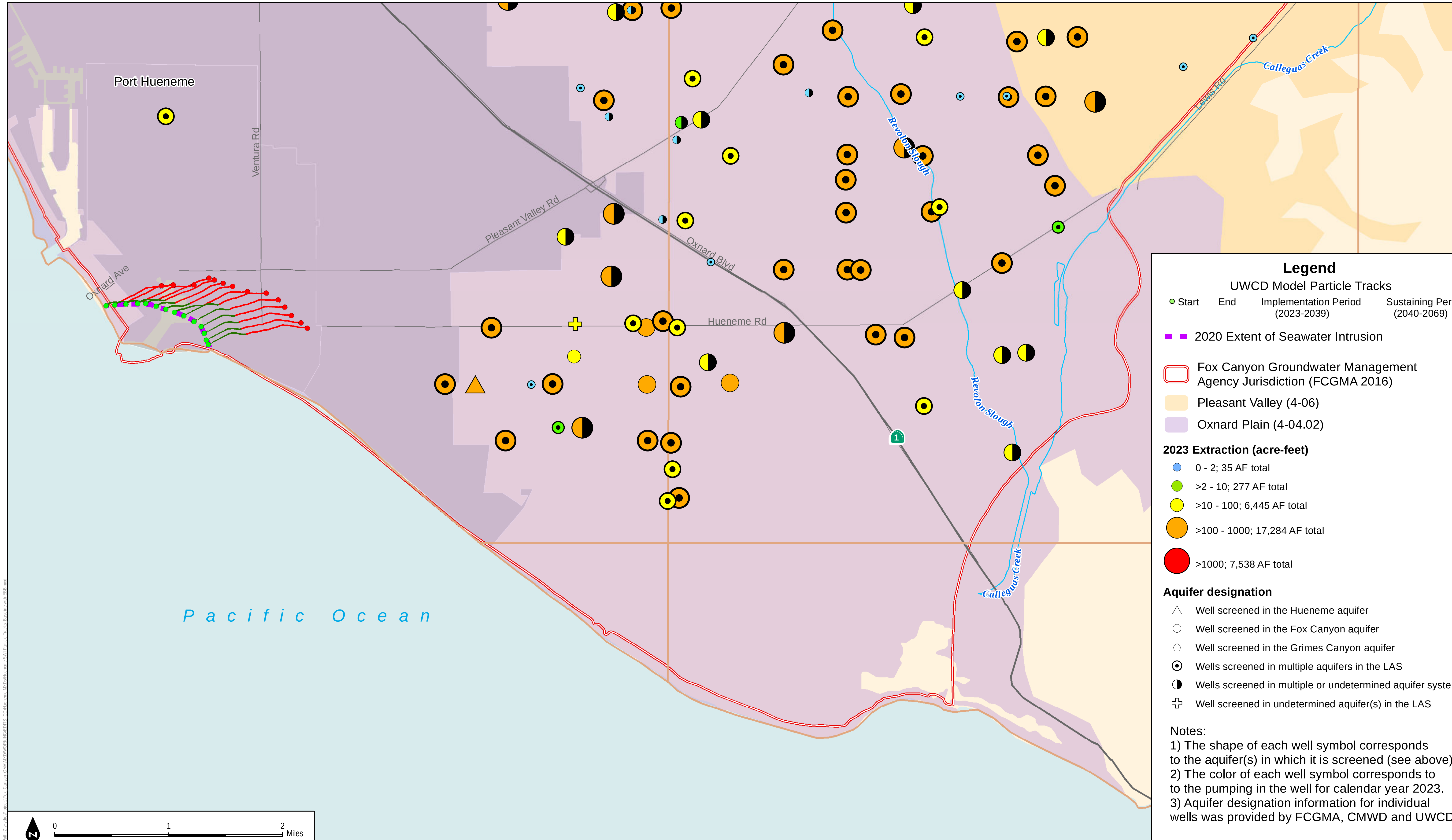

SOURCE: DWR; Ventura County; UWCD; CMWD
Climate Period 1930-1979; Climate Change Factor 2070

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Figure 5-24
UWCD Model Particle Tracks, Hueneme Aquifer, Future Baseline with EBB

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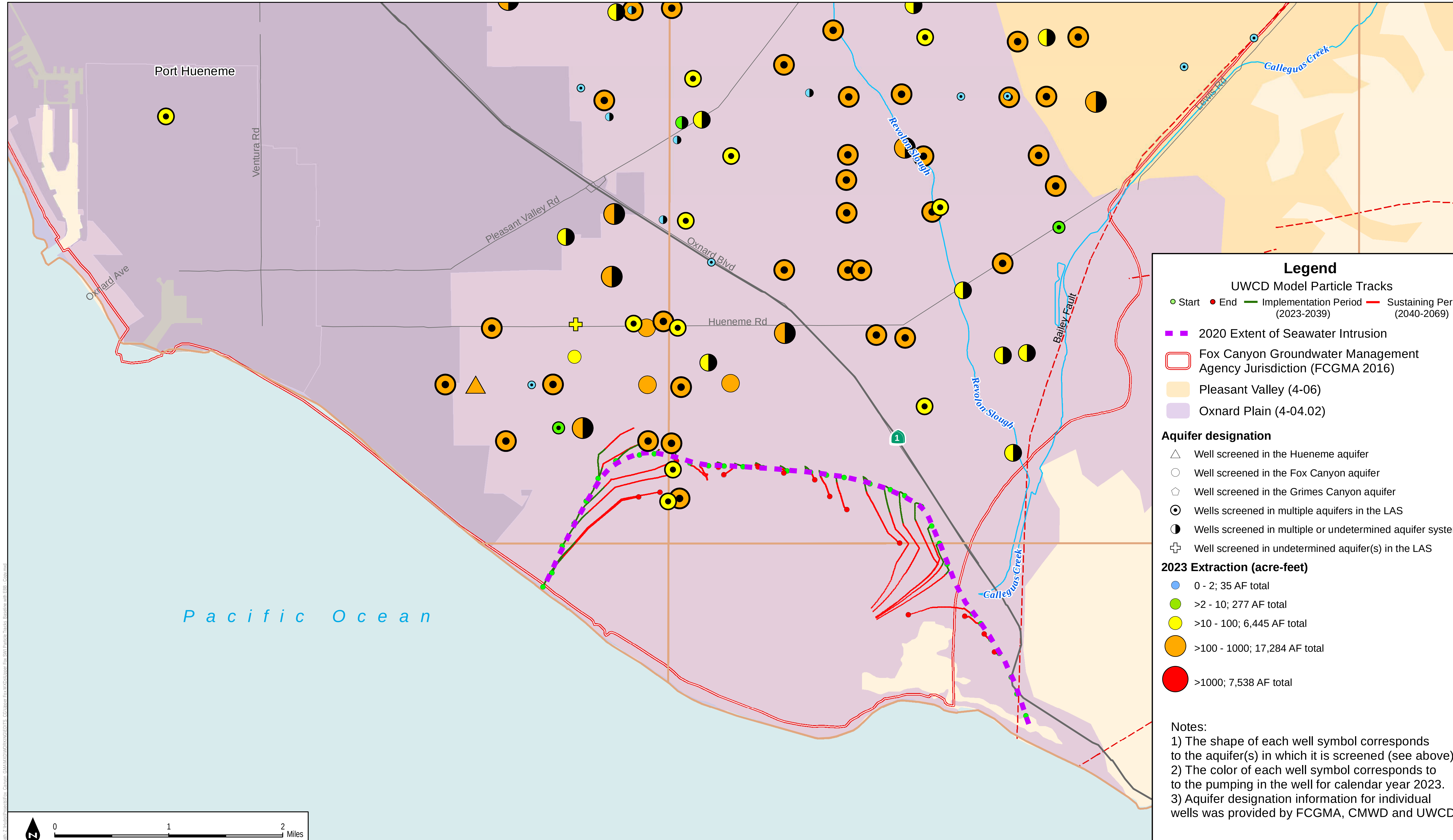

SOURCE: DWR; Ventura County; UWCD; CMWD
1930-1979 Climate Period; 2070 Climate Change Factor

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Figure 5-25
UWCD Model Particle Tracks, Upper Fox Canyon Aquifer, Future Baseline

Groundwater Sustainability Plan for the Oxnard Subbasin: First Periodic Evaluation

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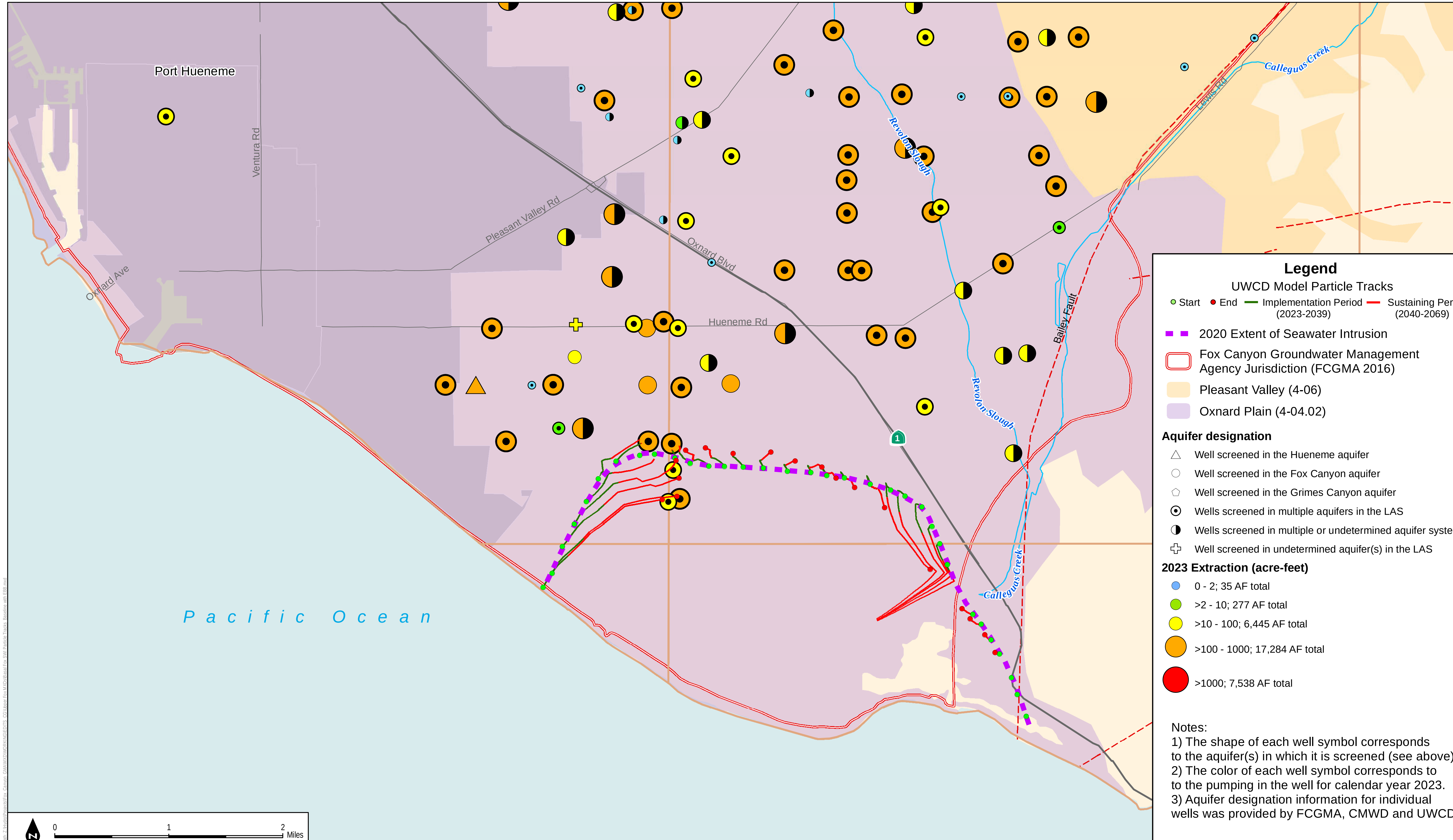

SOURCE: DWR; Ventura County; UWCD; CMWD
1930-1979 Climate Period; 2070 Climate Change Factor

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Figure 5-26
UWCD Model Particle Tracks, Basal Fox Canyon Aquifer, Future Baseline

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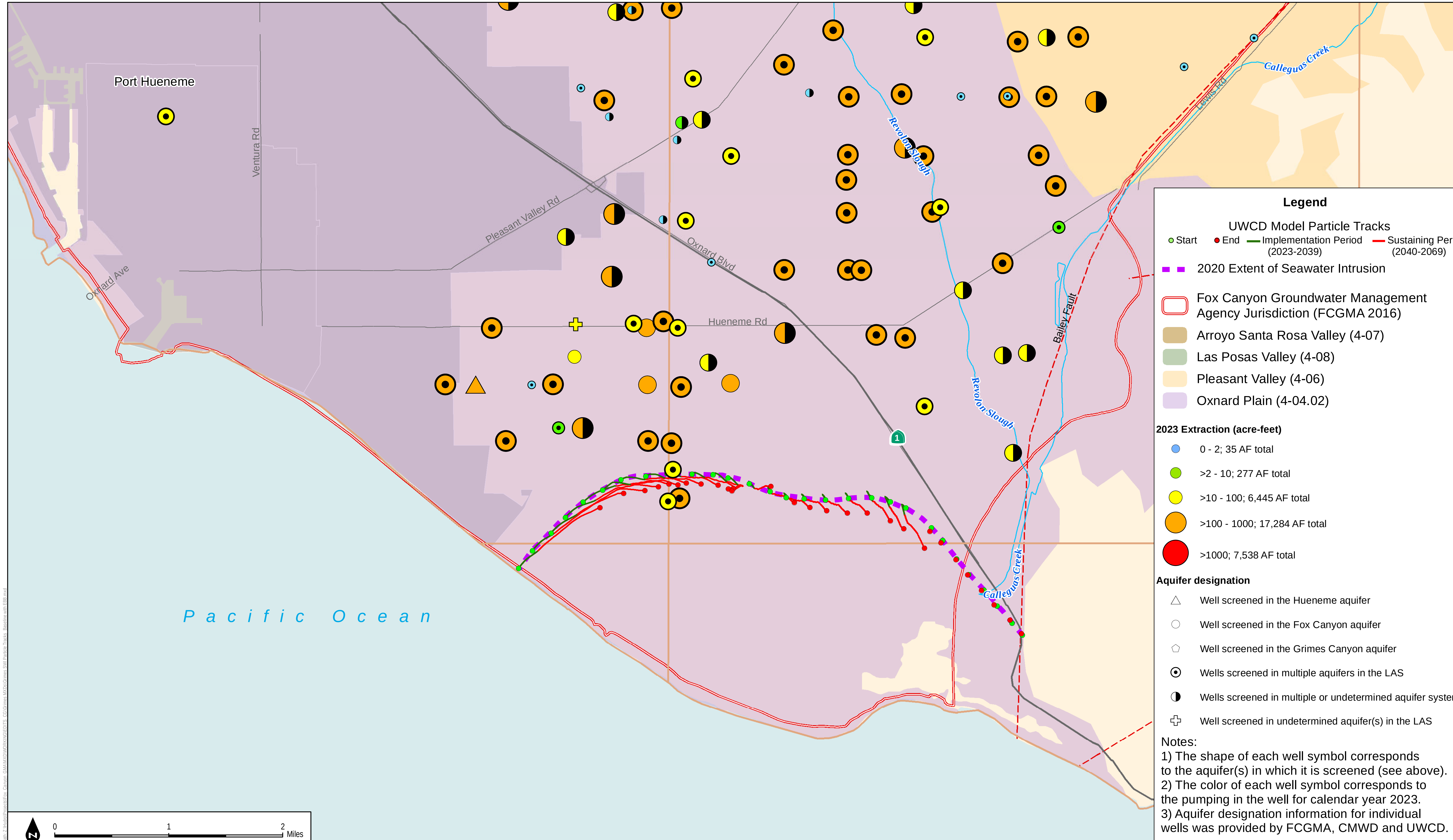

SOURCE: DWR; Ventura County; UWCD; CMWD
1930-1979 Climate Period; 2070 Climate Change Factor

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Figure 5-27
Baseline with EBB Scenario, Grimes Canyon Aquifer

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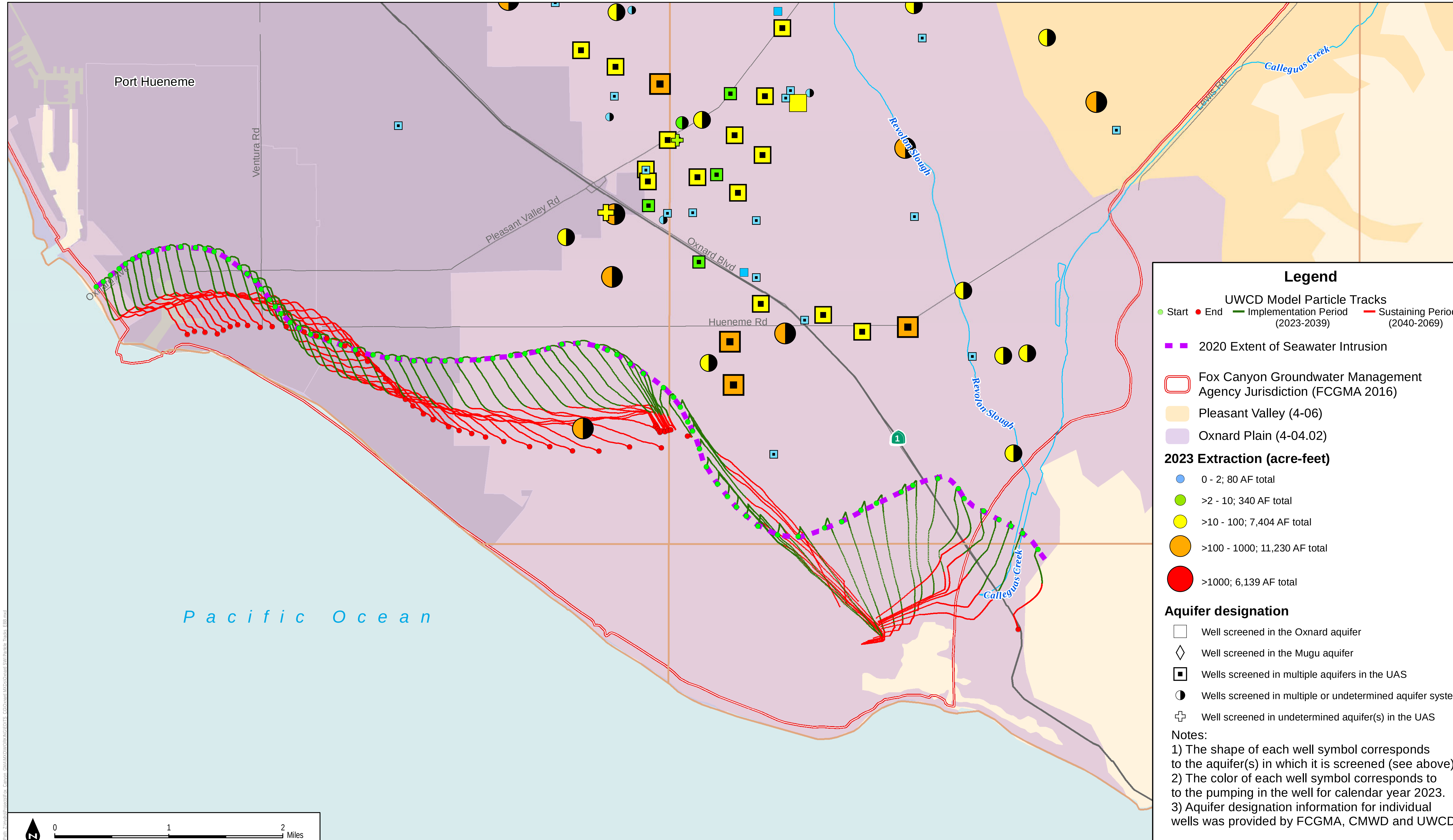

SOURCE: DWR; Ventura County; UWCD; CMWD
1930-1979 Climate Period; 2070 Climate Change Factor

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Figure 5-28
UWCD Model Particle Tracks, Oxnard Aquifer, Projects with EBB

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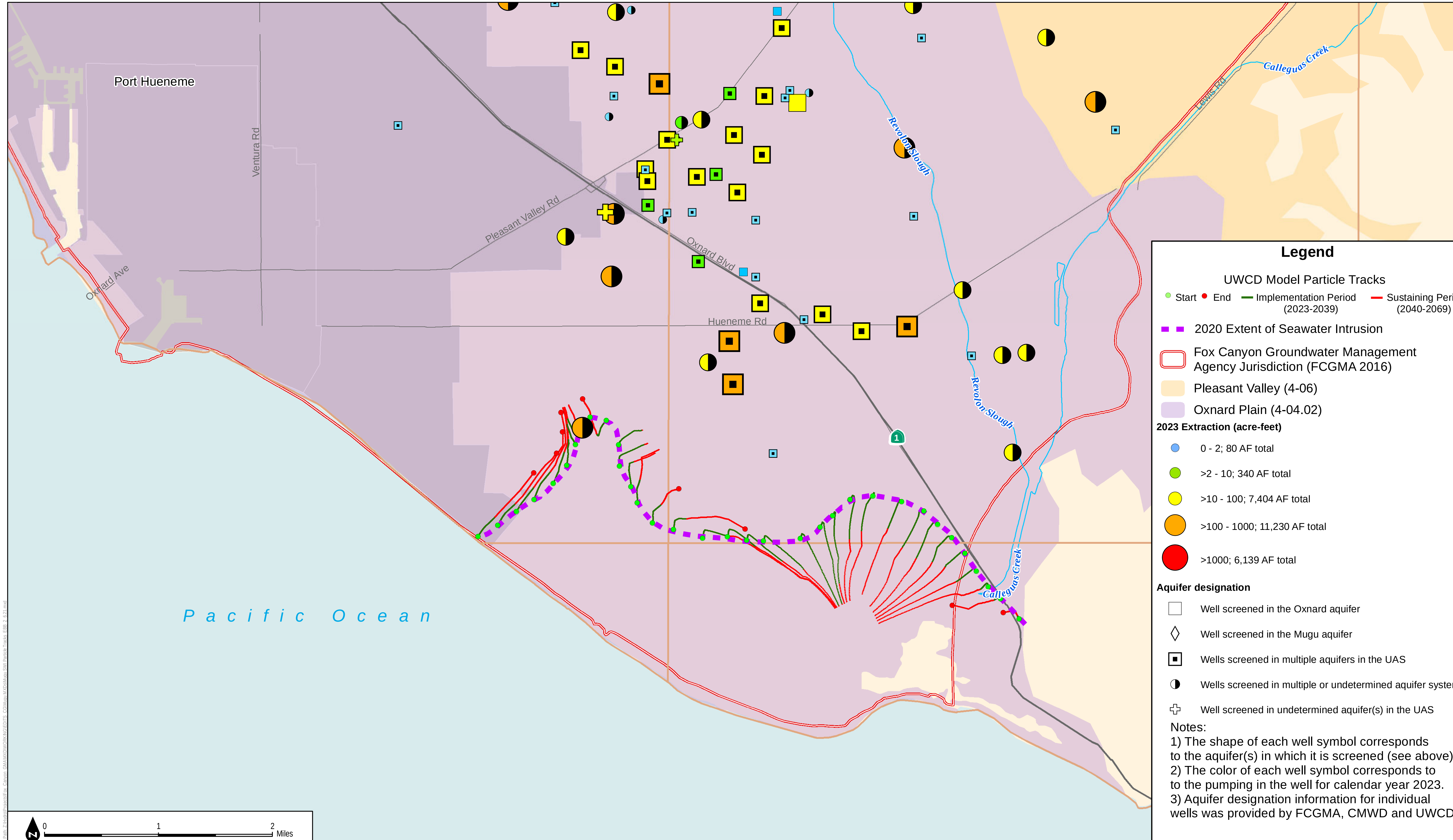

SOURCE: DWR; Ventura County; UWCD; CMWD
Climate Period 1930-1979; Climate Change Factor 2070

DUDEK

Figure 5-29
UWCD Model Particle Tracks, Mugu Aquifer, Projects with EBB

Groundwater Sustainability Plan for the Oxnard Subbasin: First Periodic Evaluation

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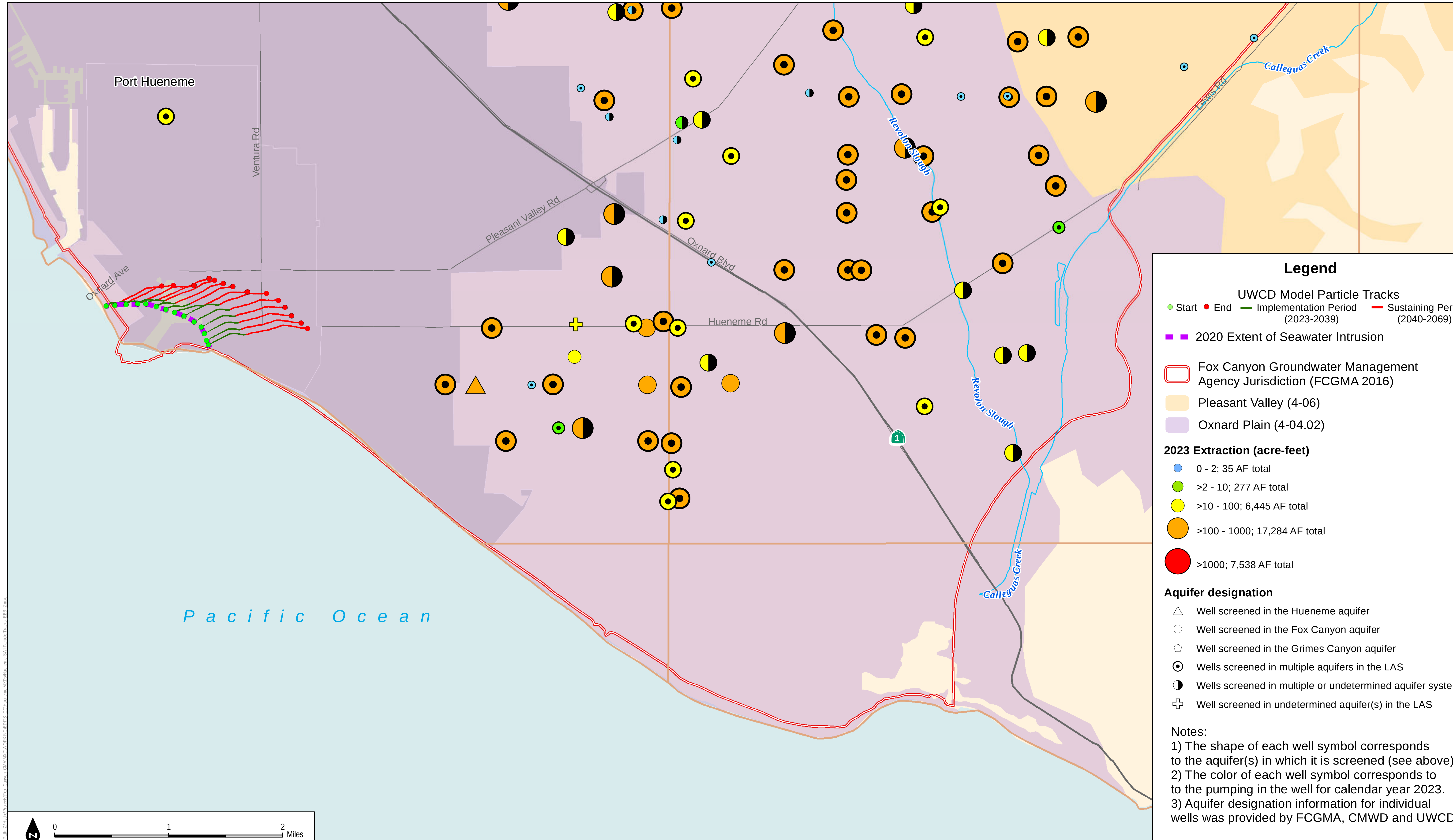

SOURCE: DWR; Ventura County; UWCD; CMWD
Climate Period 1930-1979; Climate Change Factor 2070

DUDEK

Figure 5-30
UWCD Model Particle Tracks, Hueneme Aquifer, Projects with EBB

Groundwater Sustainability Plan for the Oxnard Subbasin: First Periodic Evaluation

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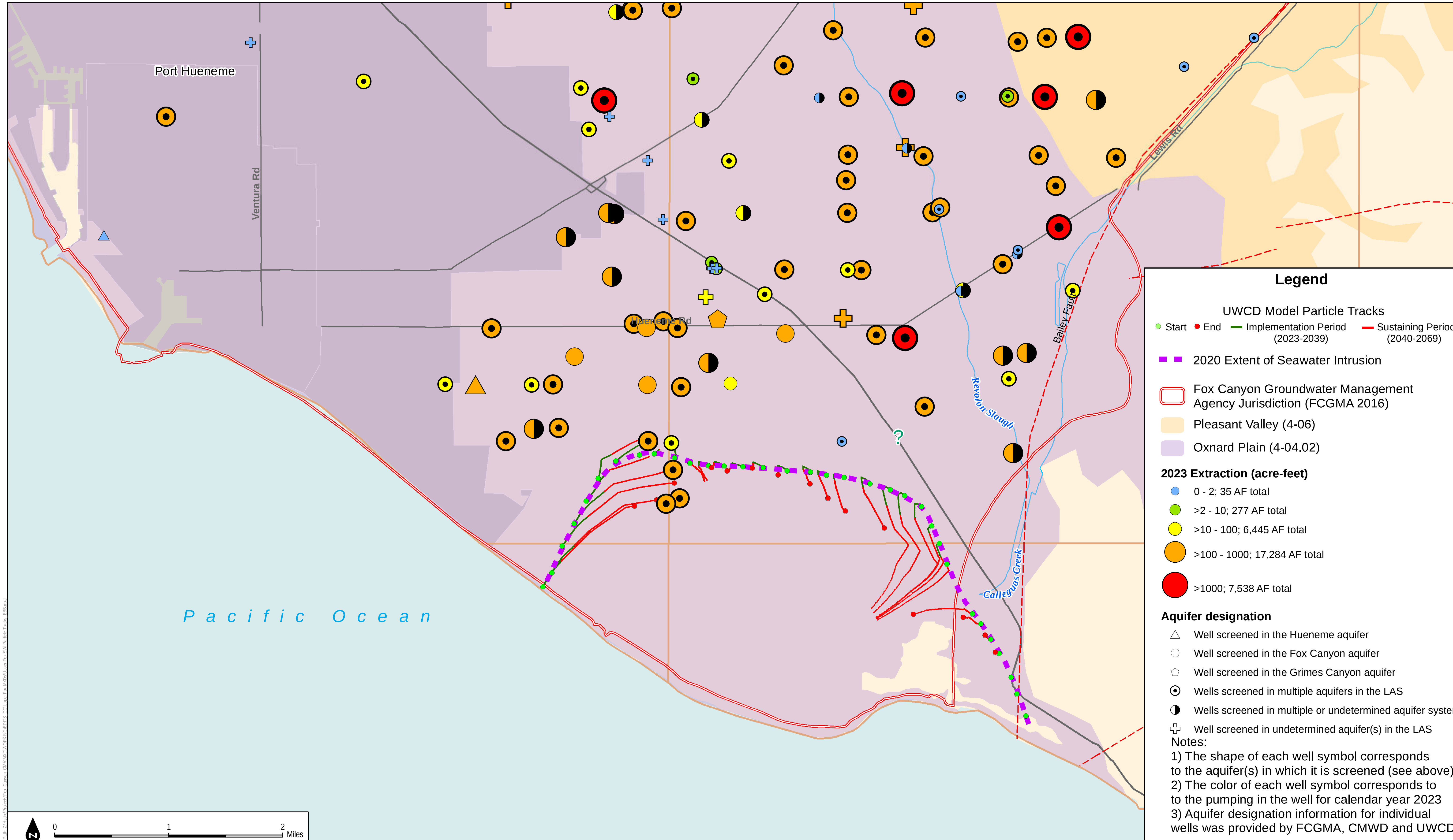

SOURCE: DWR; Ventura County; UWCD; CMWD
1930-1979 Climate Period; 2070 Climate Change Factor

DUDEK

Figure 5-31
UWCD Model Particle Tracks, Upper Fox Canyon Aquifer, Projects with EBB

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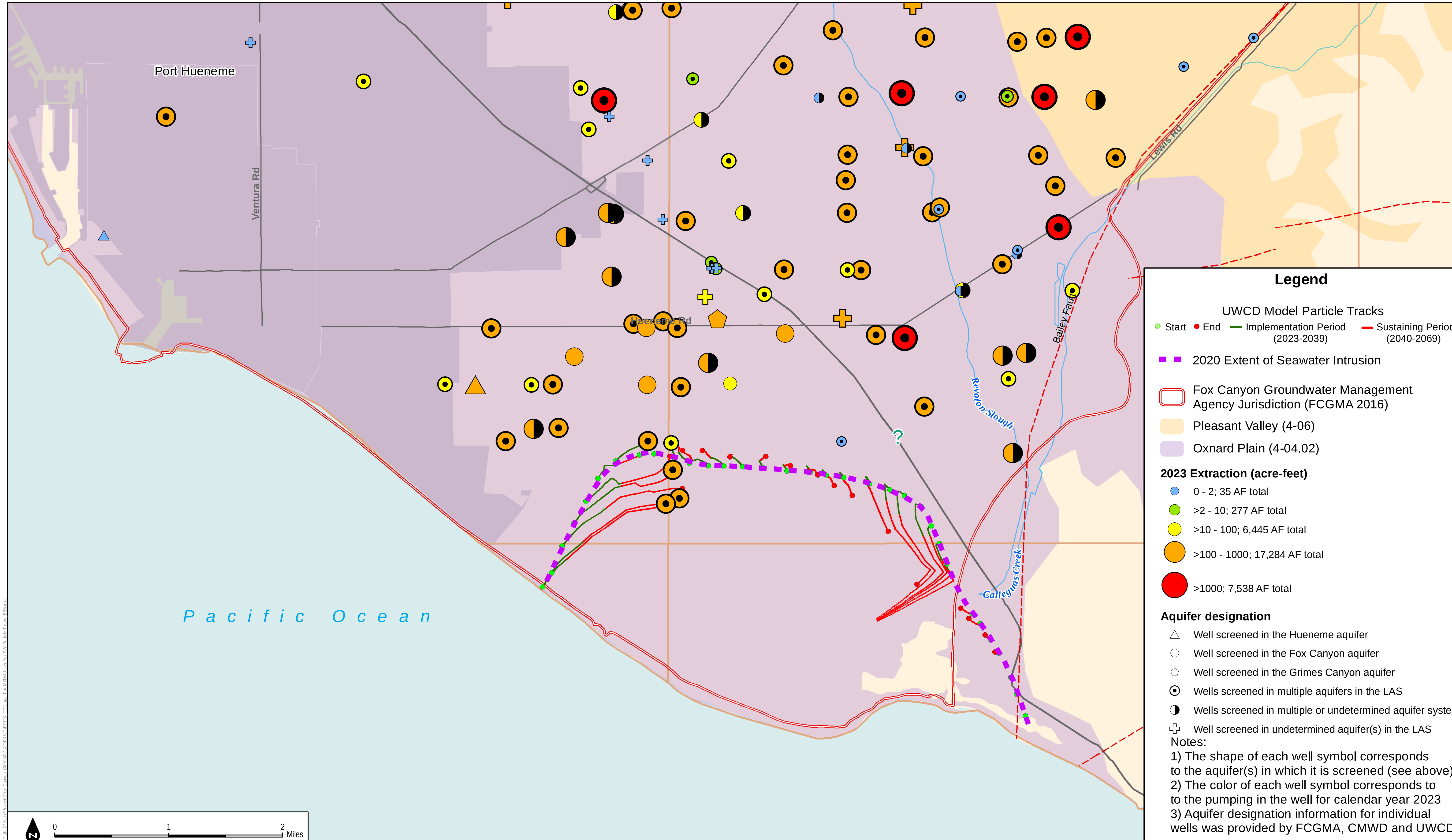

DUDEK

SOURCE: DWR; Ventura County; UWCD; CMWD
1930-1979 Climate Period; 2070 Climate Change Factor

Figure 5-32
UWCD Model Particle Tracks, Basal Fox Canyon Aquifer, Projects with EBB

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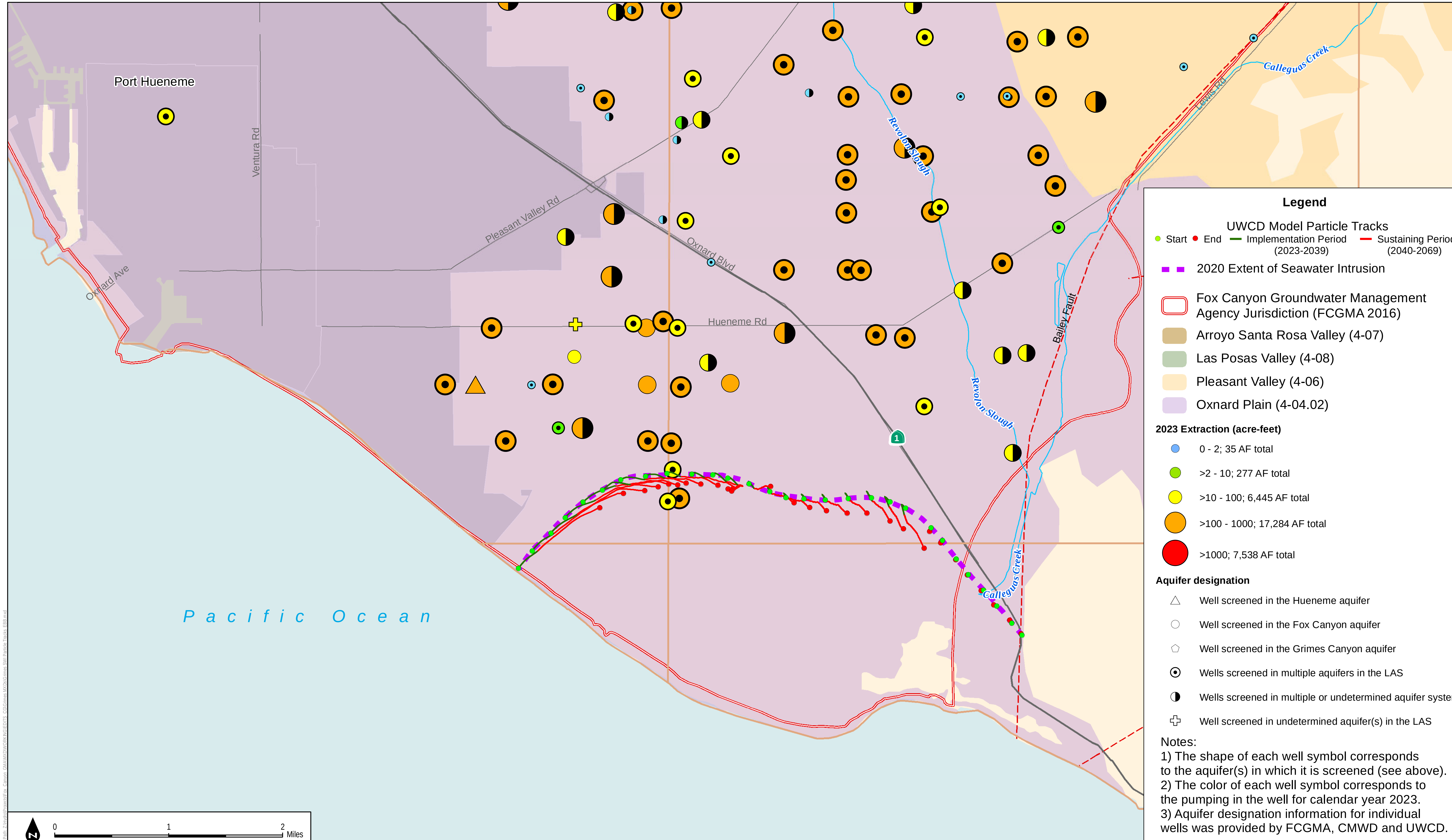

SOURCE: DWR; Ventura County; UWCD; CMWD
1930-1979 Climate Period; 2070 Climate Change Factor

DUDEK

Figure 5-33
UWCD Model Particle Tracks, Grimes Canyon Aquifer, Projects with EBB

Groundwater Sustainability Plan for the Oxnard Subbasin: First Periodic Evaluation

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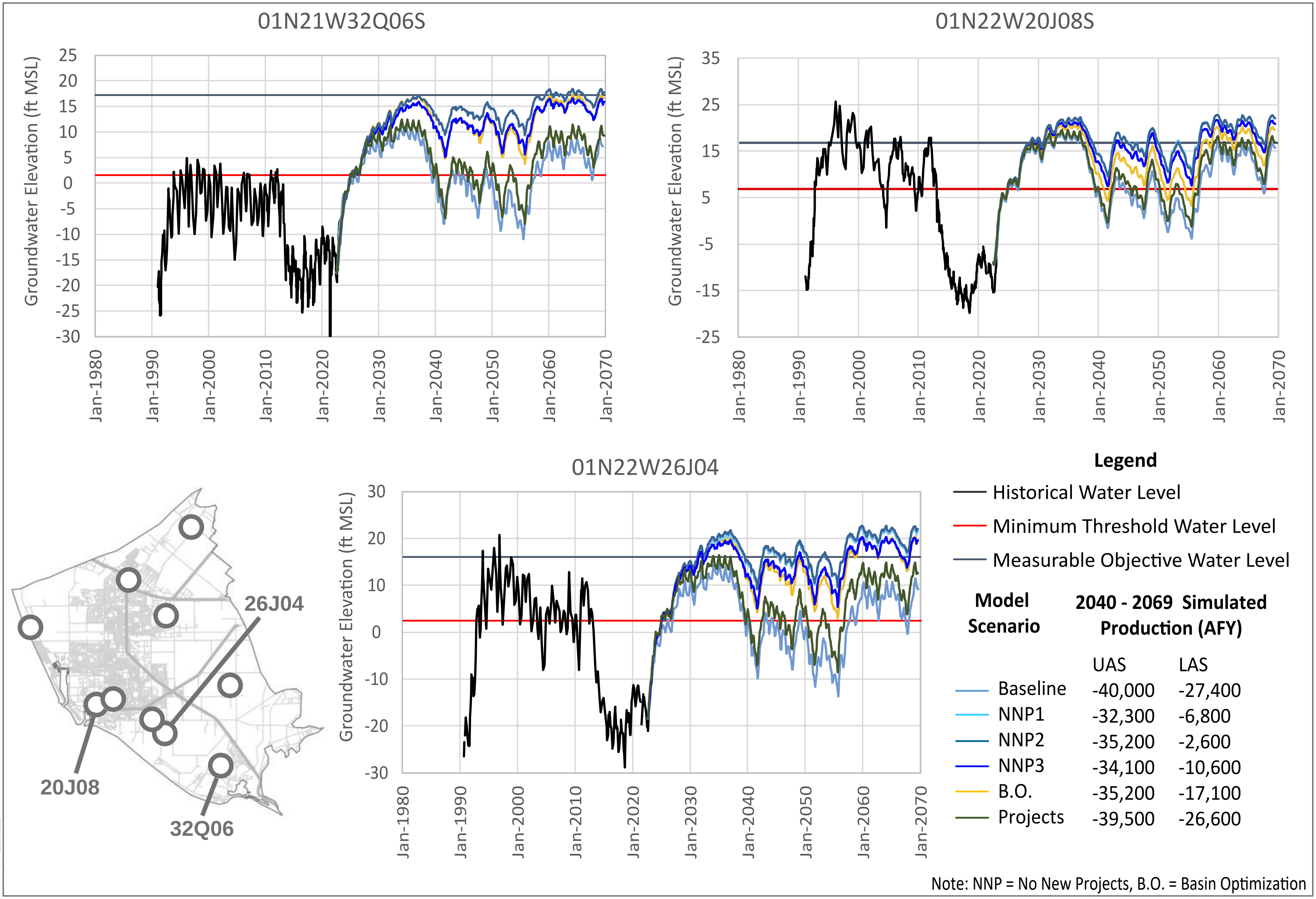

SOURCE: UWCD, VCWPD

FIGURE 6-1a

Key Well Hydrographs for Wells Screened in the Oxnard Aquifer

Groundwater Sustainability Plan for the Oxnard Subbasin: First Periodic Evaluation

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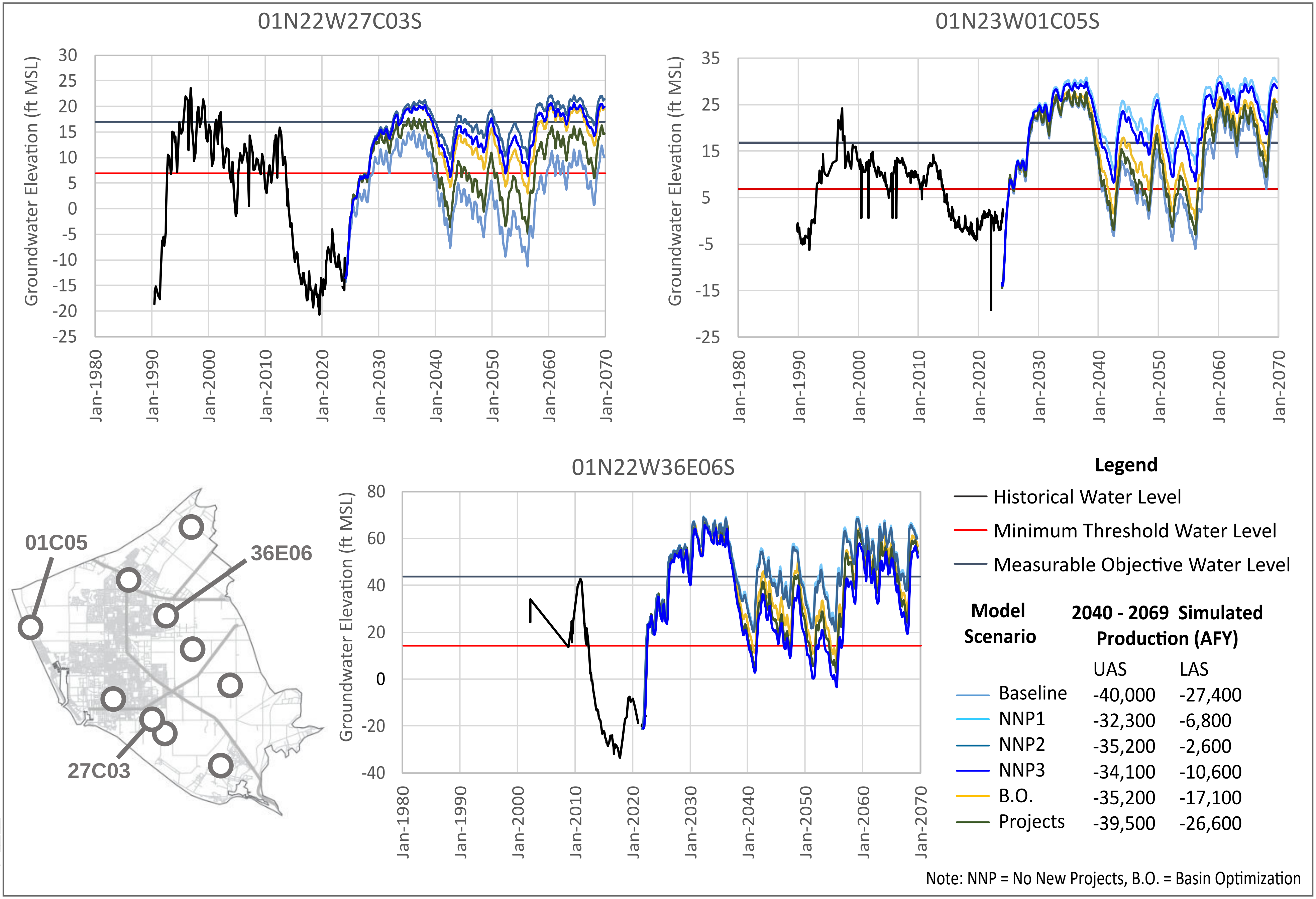

SOURCE: UWCD, VCWPD

FIGURE 6-1b

Key Well Hydrographs for Wells Screened in the Oxnard Aquifer

Groundwater Sustainability Plan for the Oxnard Subbasin: First Periodic Evaluation

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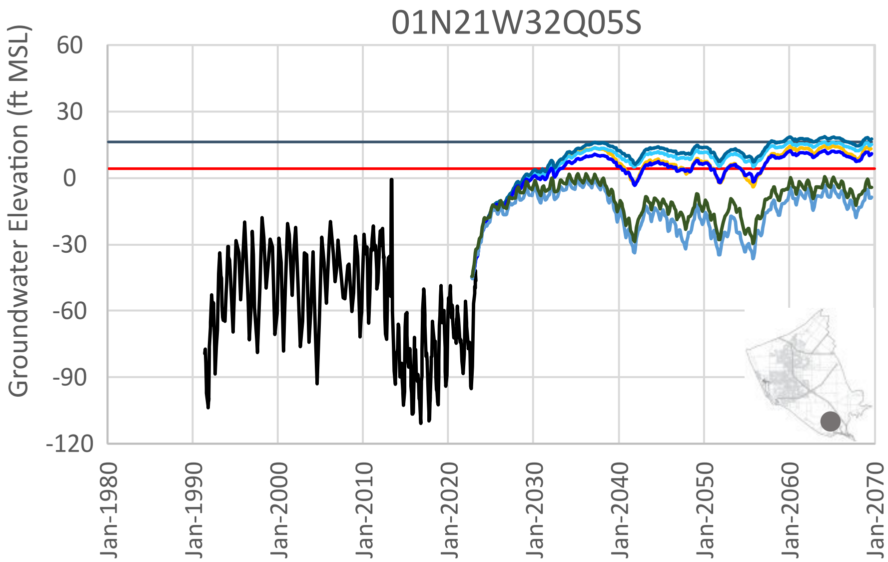

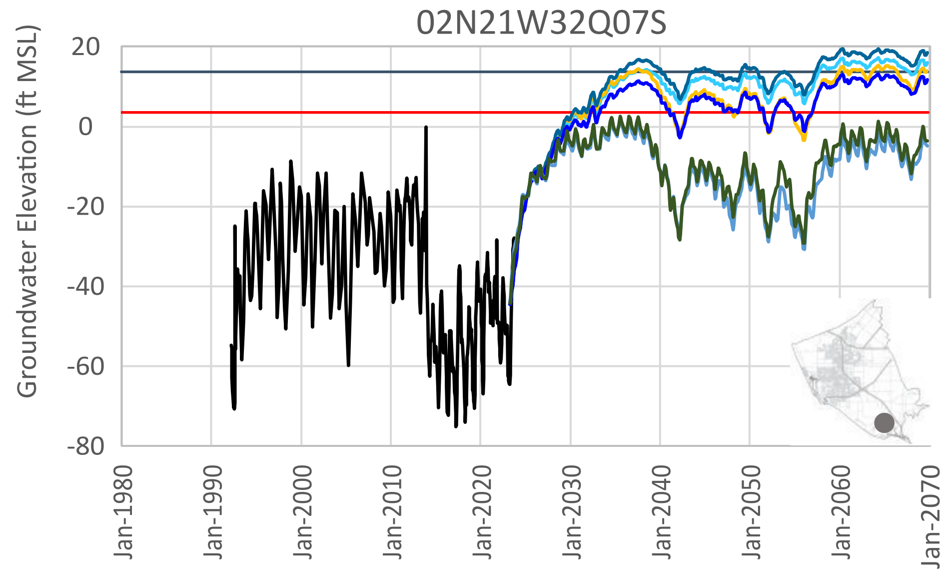

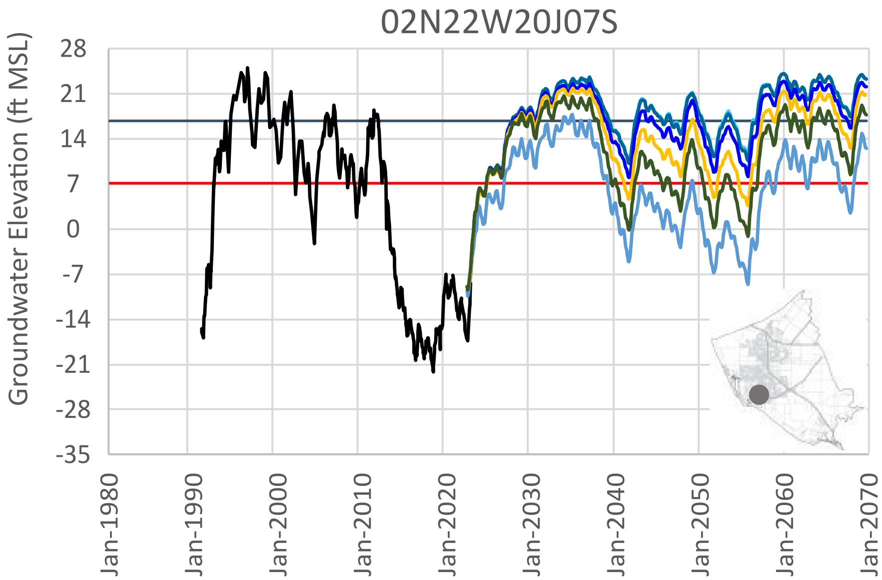

Legend

- Historical Water Level
- Minimum Threshold Water Level
- Measurable Objective Water Level

2040 - 2069 Production (AFY)

	Baseline	NNP1	NNP2	NNP3	B.O.	Projects
UAS	-40,000	-32,000	-35,200	-34,100	-35,200	-39,500
LAS	-27,400	-6,800	-2,600	-10,600	-17,100	-26,600

Note: NNP = No New Projects, B.O. = Basin Optimization

SOURCE: UWCD, VCWPD

FIGURE 6-2a

Key Well Hydrographs for Wells Screened in the Mugu Aquifer

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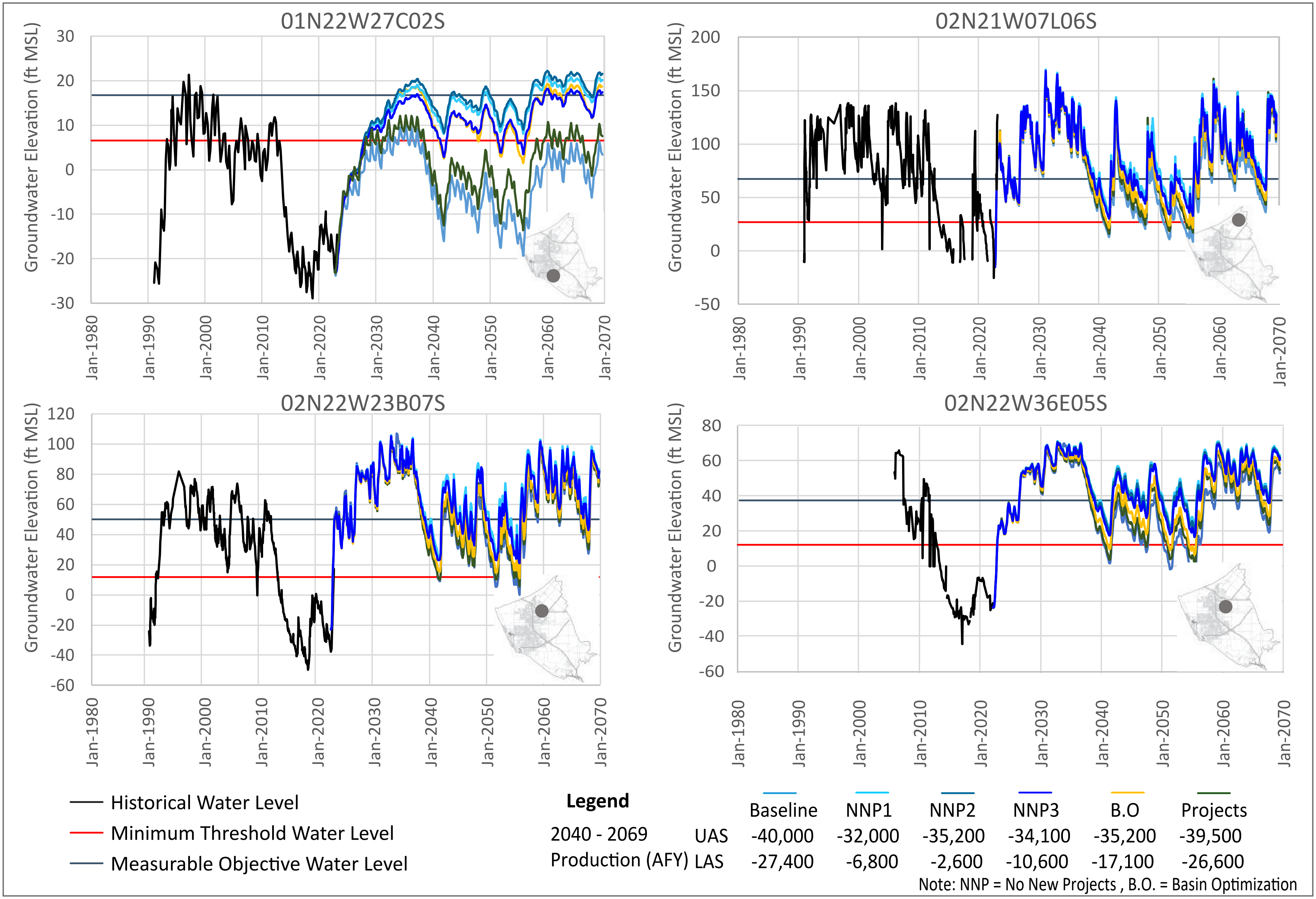

SOURCE: UWCD, VCWPD

FIGURE 6-2b

Key Well Hydrographs for Wells Screened in the Mugu Aquifer

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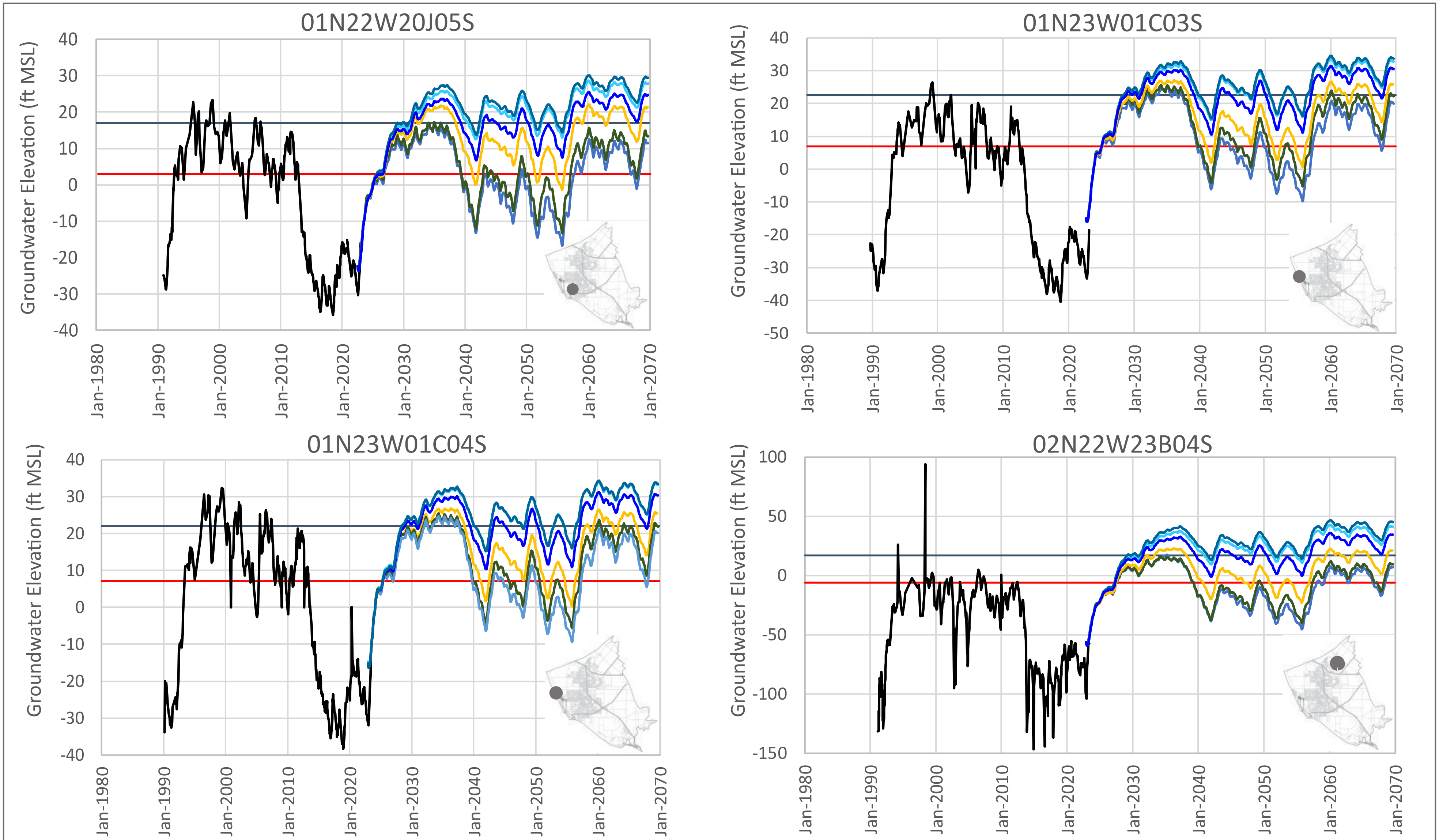

Legend

- Historical Water Level
- Minimum Threshold Water Level
- Measurable Objective Water Level

		Baseline	NNP1	NNP2	NNP3	B.O.	Projects
2040 - 2069	UAS	-40,000	-32,000	-35,200	-34,100	-35,200	-39,500
Production (AFY)	LAS	-28,300	-6,800	-2,600	-10,600	-17,100	-26,600

Note: NNP = No New Projects, B.O. = Basin Optimization

SOURCE: UWCD, VCWPD

FIGURE 6-3a

Key Well Hydrographs for Wells Screened in the Hueneme Aquifer

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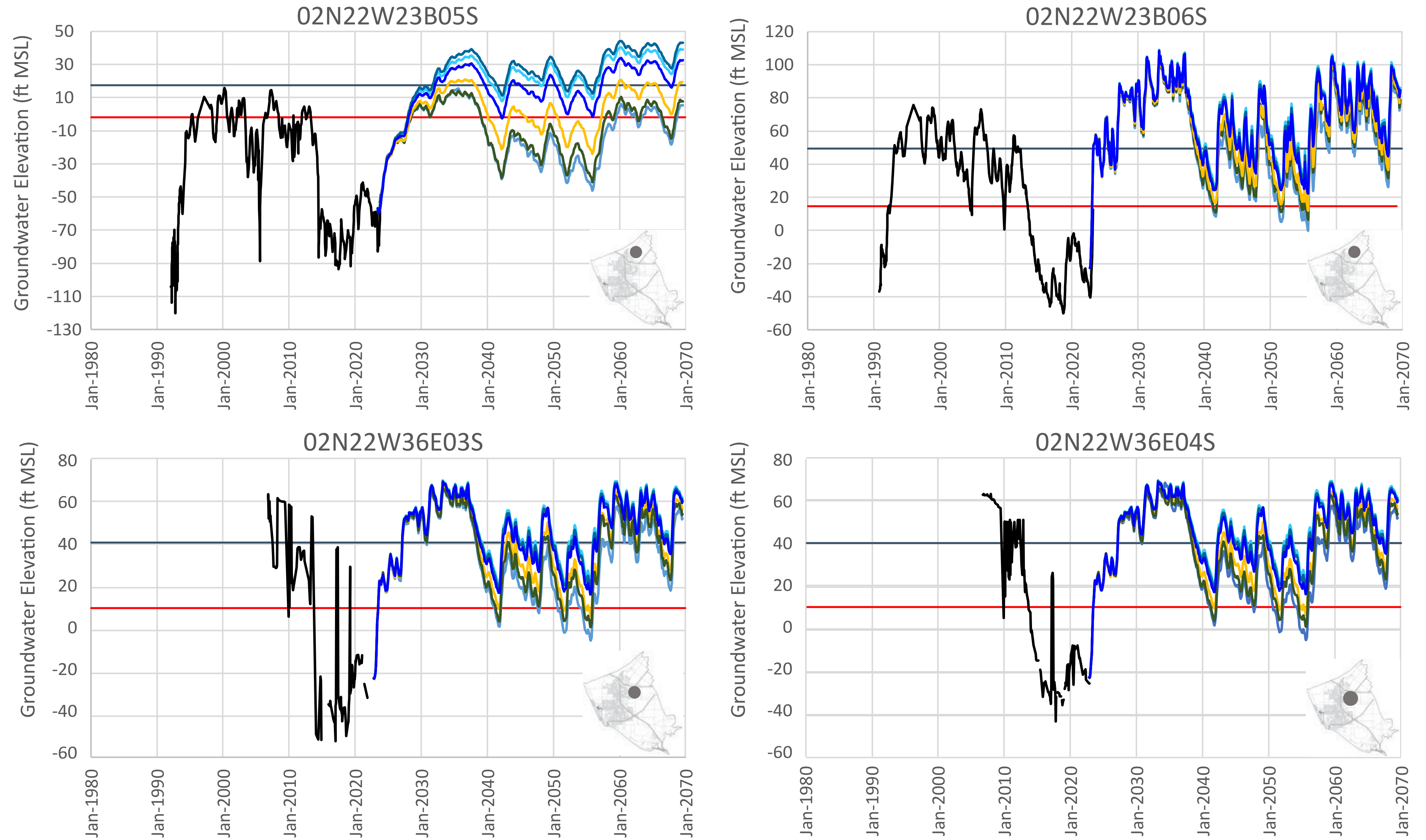

Historical Water Level
Minimum Threshold Water Level
Measurable Objective Water Level

Legend

		Baseline	NNP1	NNP2	NNP3	B.O.	Projects
2040 - 2069	UAS	-40,000	-32,000	-35,200	-34,100	-35,200	-39,500
Production (AFY)	LAS	-27,400	-6,800	-2,600	-10,600	-17,100	-26,600

Note: NNP = No New Projects, B.O. = Basin Optimization

SOURCE: UWCD, VCWPD

FIGURE 6-3b

Key Well Hydrographs for Wells Screened in the Hueneme Aquifer

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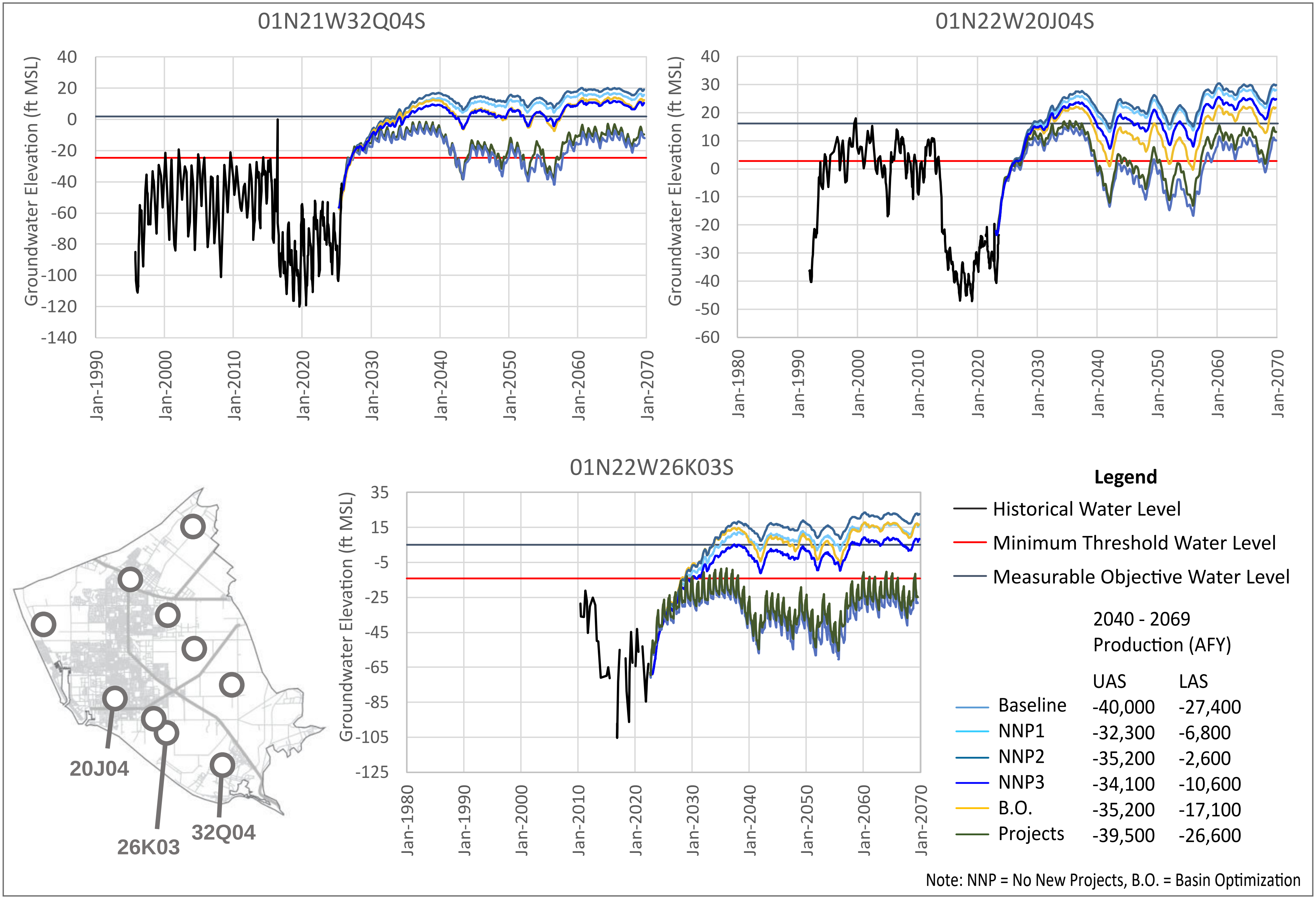

SOURCE: UWCD, VCWPD

FIGURE 6-4a

Key Well Hydrographs for Wells Screened in the Fox Canyon Aquifer

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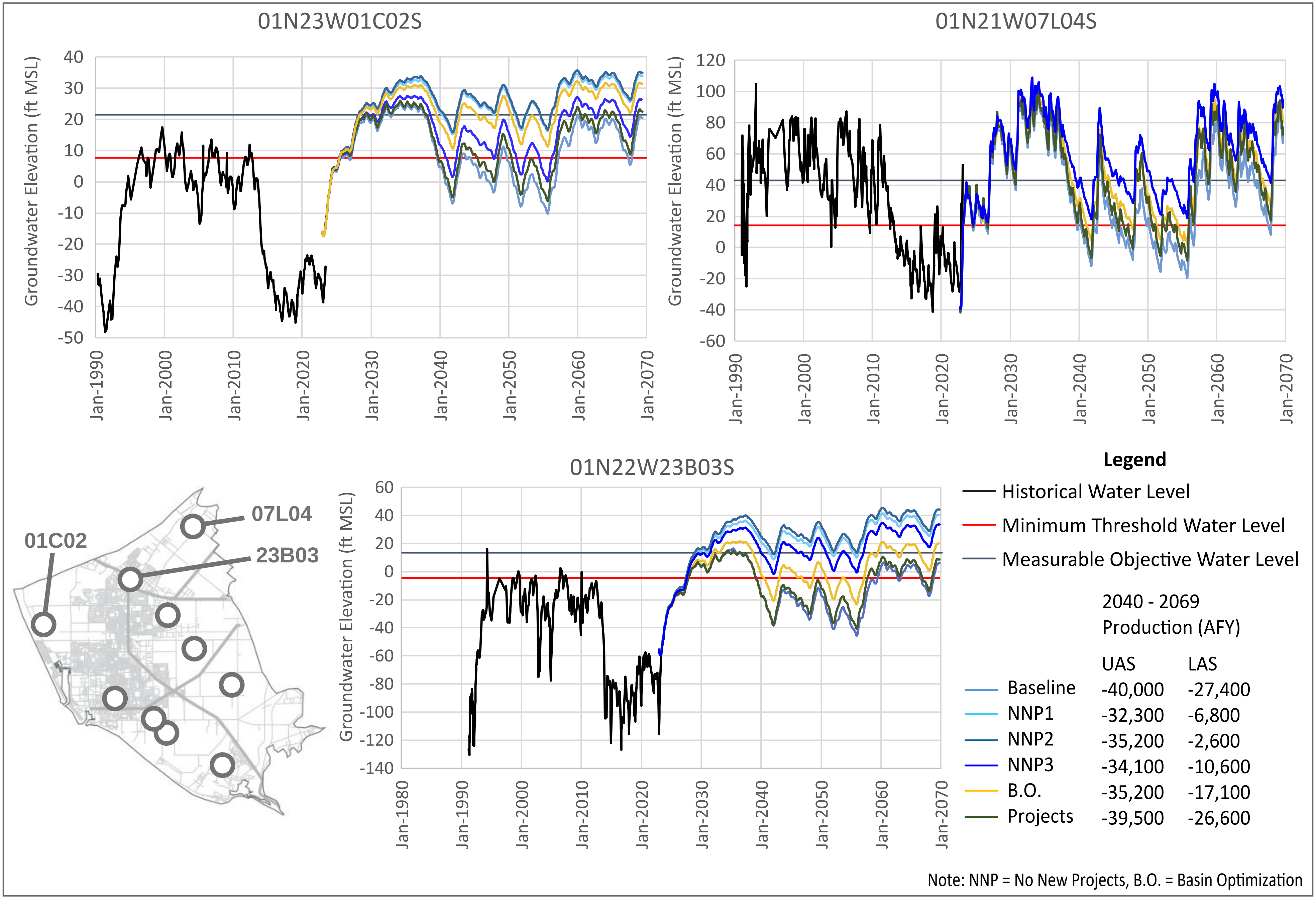

SOURCE: UWCD, VCWPD

FIGURE 6-4b

Key Well Hydrographs for Wells Screened in the Fox Canyon Aquifer

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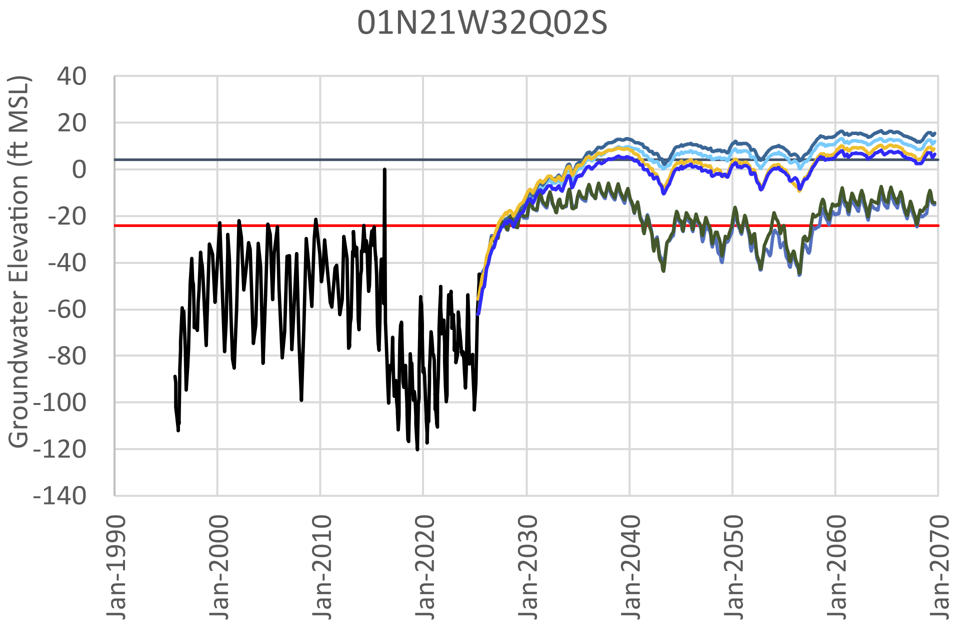

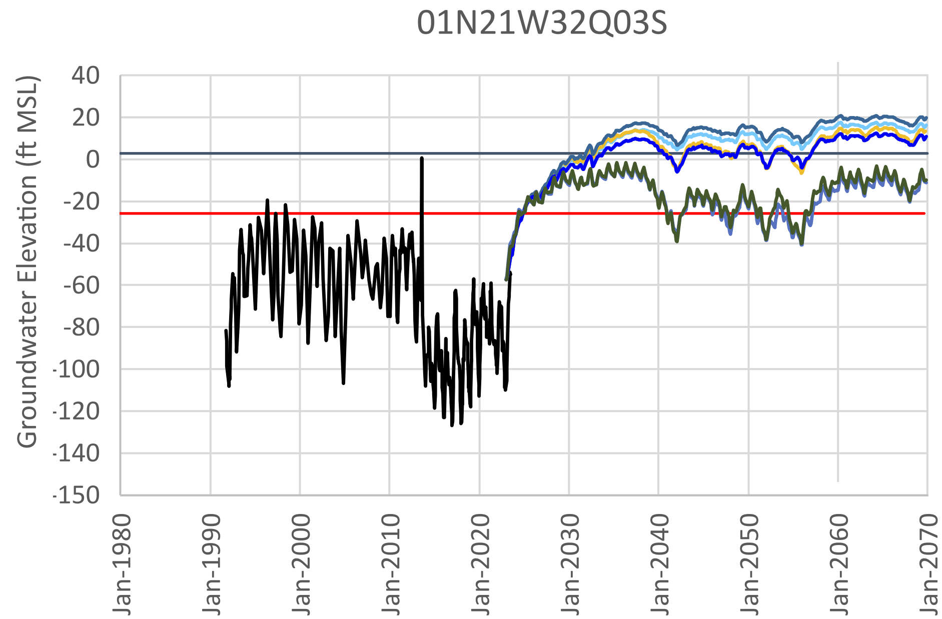

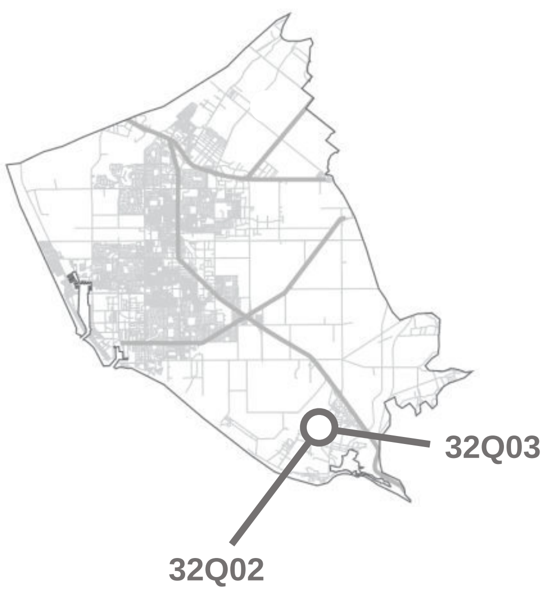

Legend

- Historical Water Level
- Minimum Threshold Water Level
- Measurable Objective Water Level

2040 - 2069 Production (AFY)

	UAS	LAS
Baseline	-40,000	-27,400
NNP1	-32,300	-6,800
NNP2	-35,200	-2,600
NNP3	-34,100	-10,600
B.O.	-35,200	-17,100
Projects	-39,500	-26,600

Note: NNP = No New Projects, B.O. = Basin Optimization

SOURCE: UWCD, VCWPD

FIGURE 6-5

Key Well Hydrographs for Wells Screened in the Grimes Canyon Aquifer

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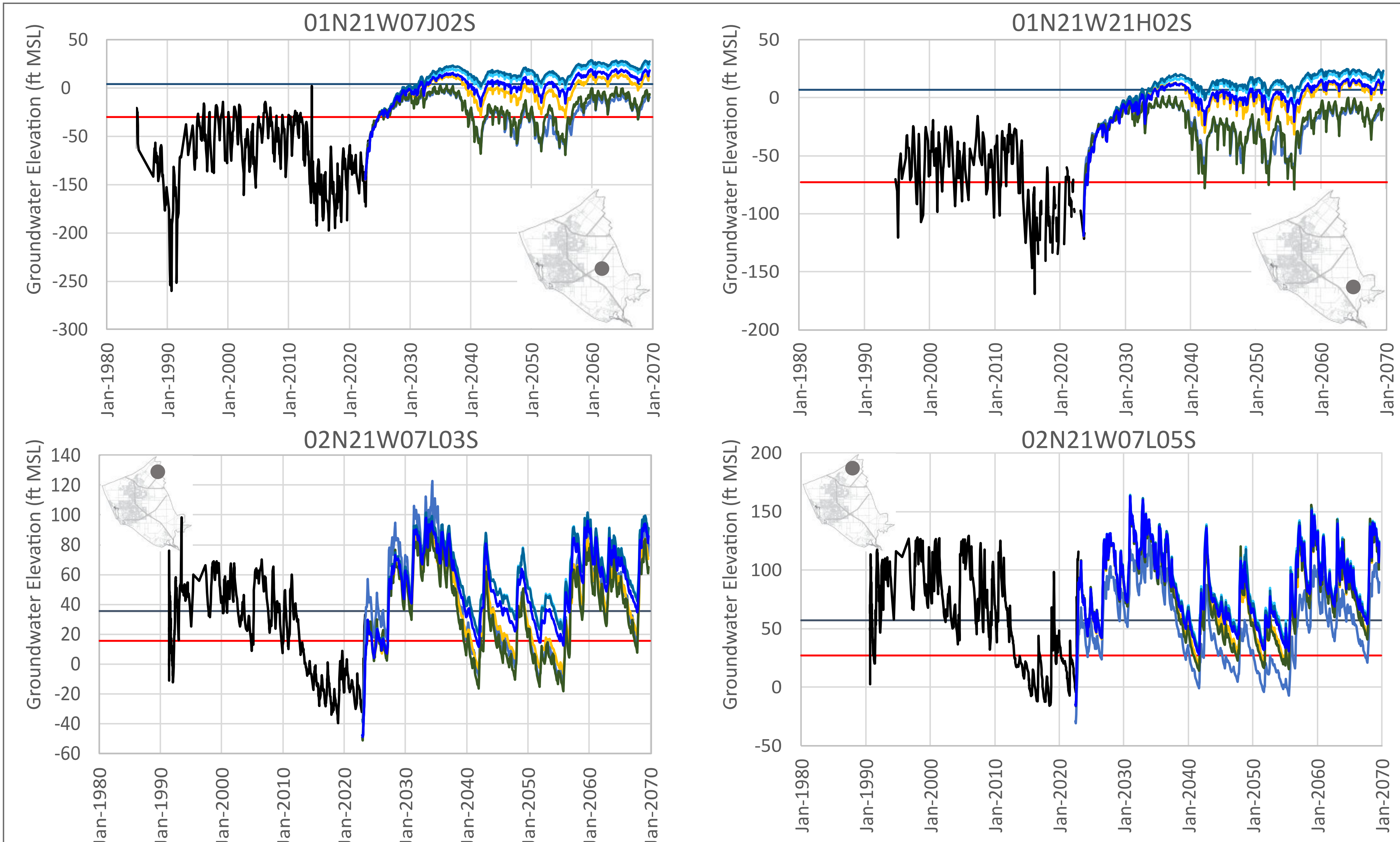

Historical Water Level
Minimum Threshold Water Level
Measurable Objective Water Level

Legend

2040 - 2069 Production (AFY)		Baseline	NNP1	NNP2	NNP3	B.O.	Projects
	UAS	-40,000	-32,000	-35,200	-34,100	-35,200	-39,500
	LAS	-27,400	-6,800	-2,600	-10,600	-17,100	-26,600

Note: NNP = No New Projects, B.O. = Basin Optimization

SOURCE: UWCD, VCWPD

FIGURE 6-6

Key Well Hydrographs for Wells Screened in the Multiple Aquifers

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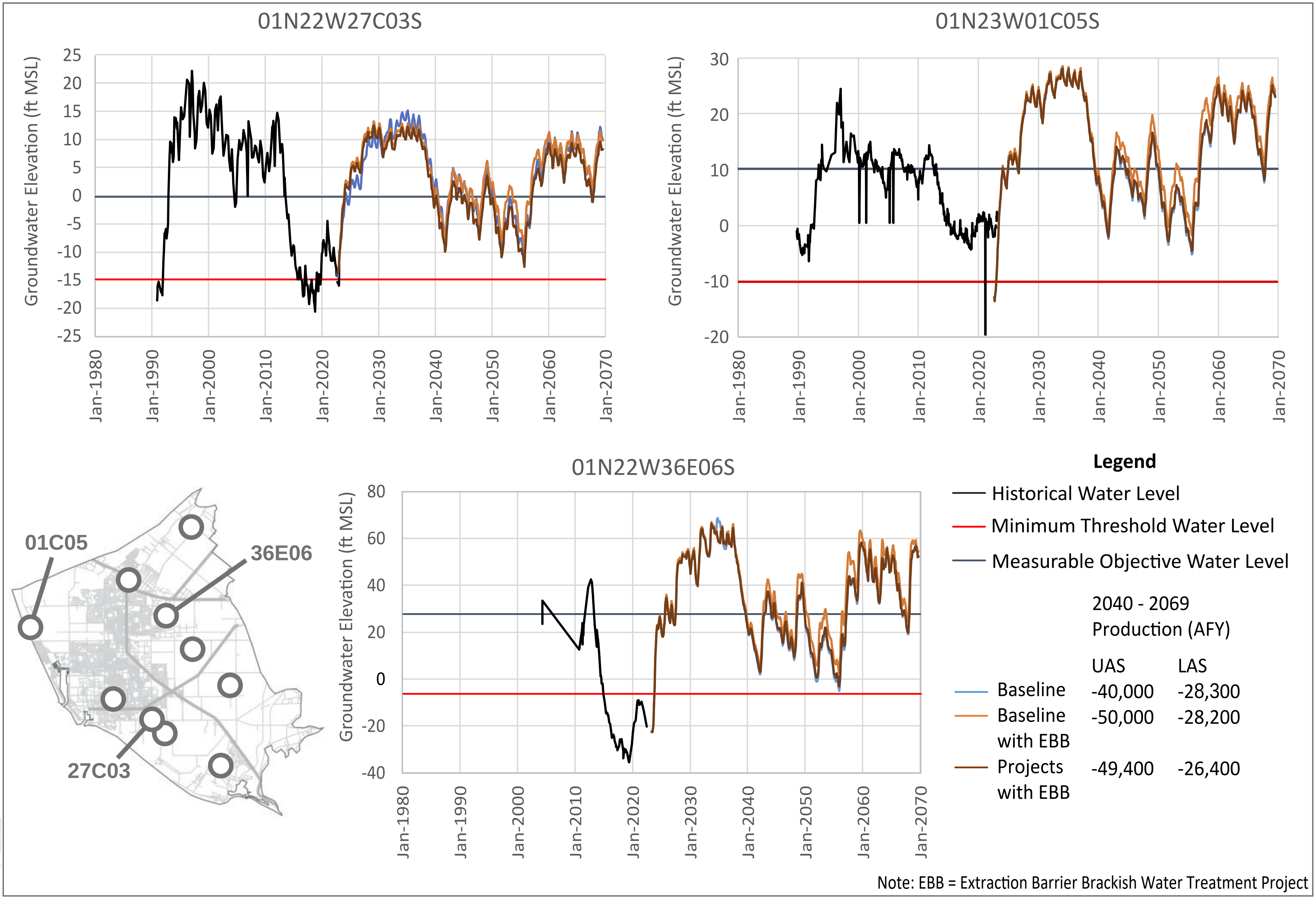

SOURCE: UWCD, VCWPD

FIGURE 6-7a

Key Well Hydrographs for Wells Screened in the Oxnard Aquifer: EBB Scenarios

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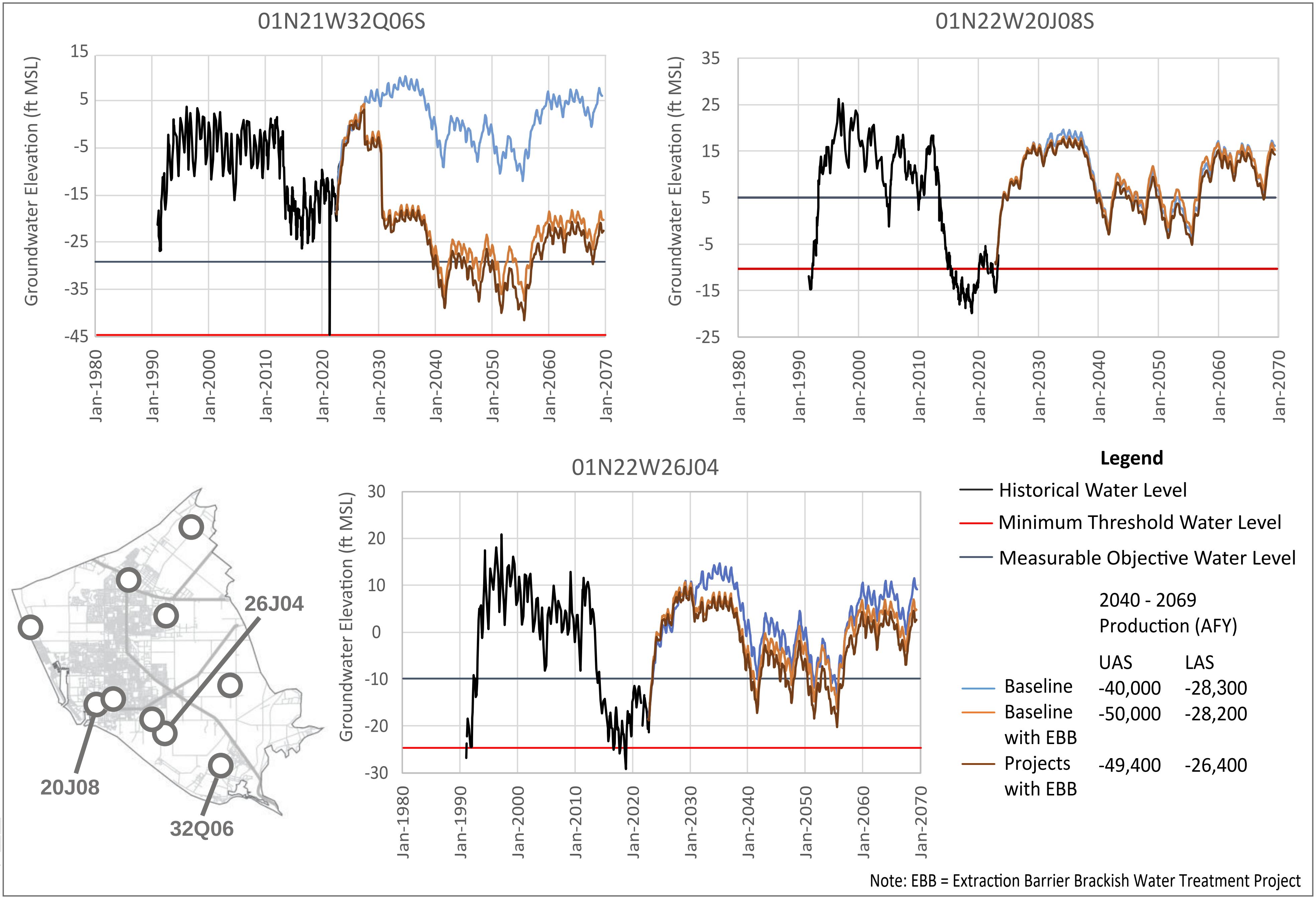

SOURCE: UWCD, VCWPD

FIGURE 6-7b

Key Well Hydrographs for Wells Screened in the Oxnard Aquifer: EBB Scenarios

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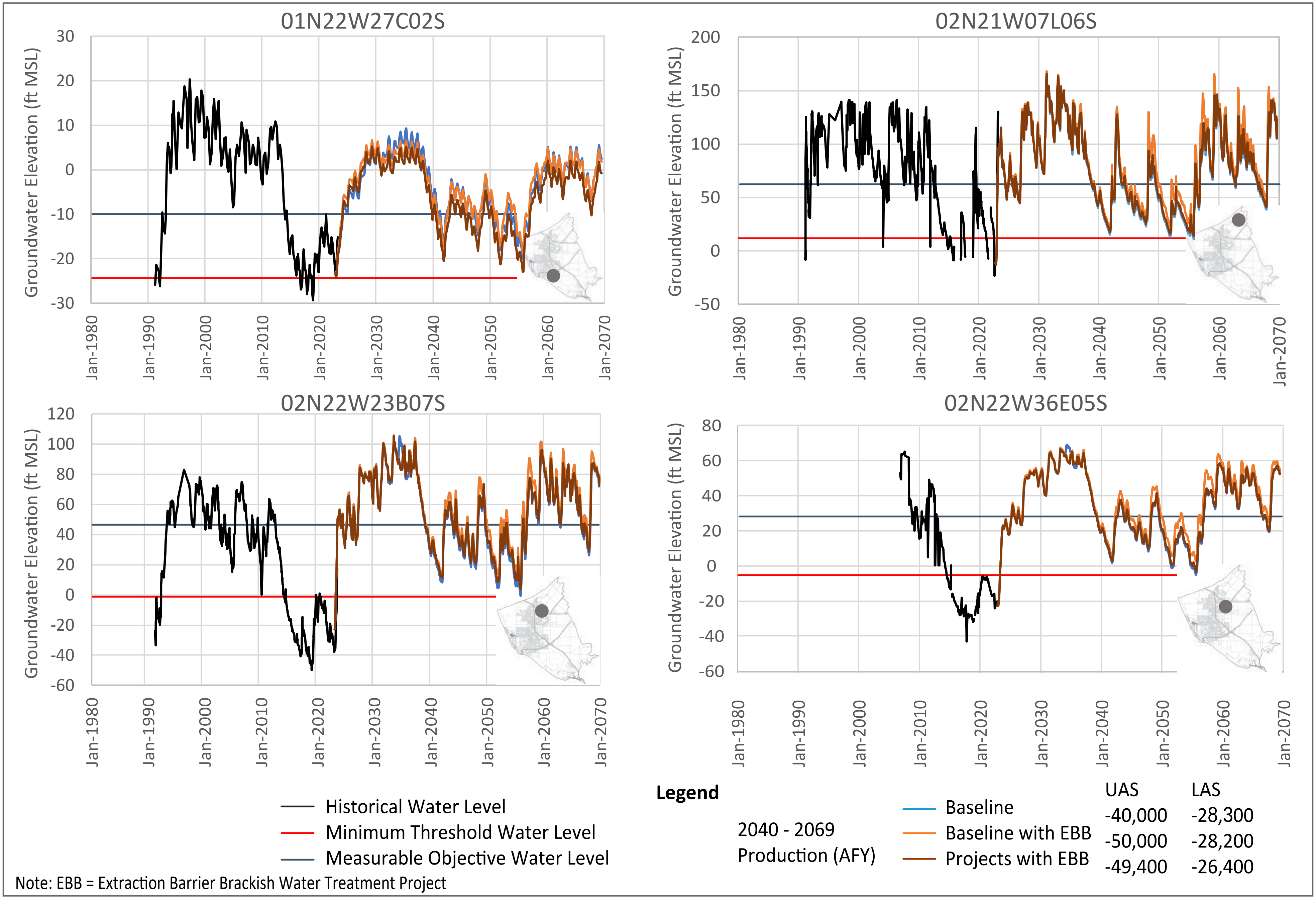

SOURCE: UWCD, VCWPD

FIGURE 6-8a

Key Well Hydrographs for Wells Screened in the Mugu Aquifer: EBB Scenarios

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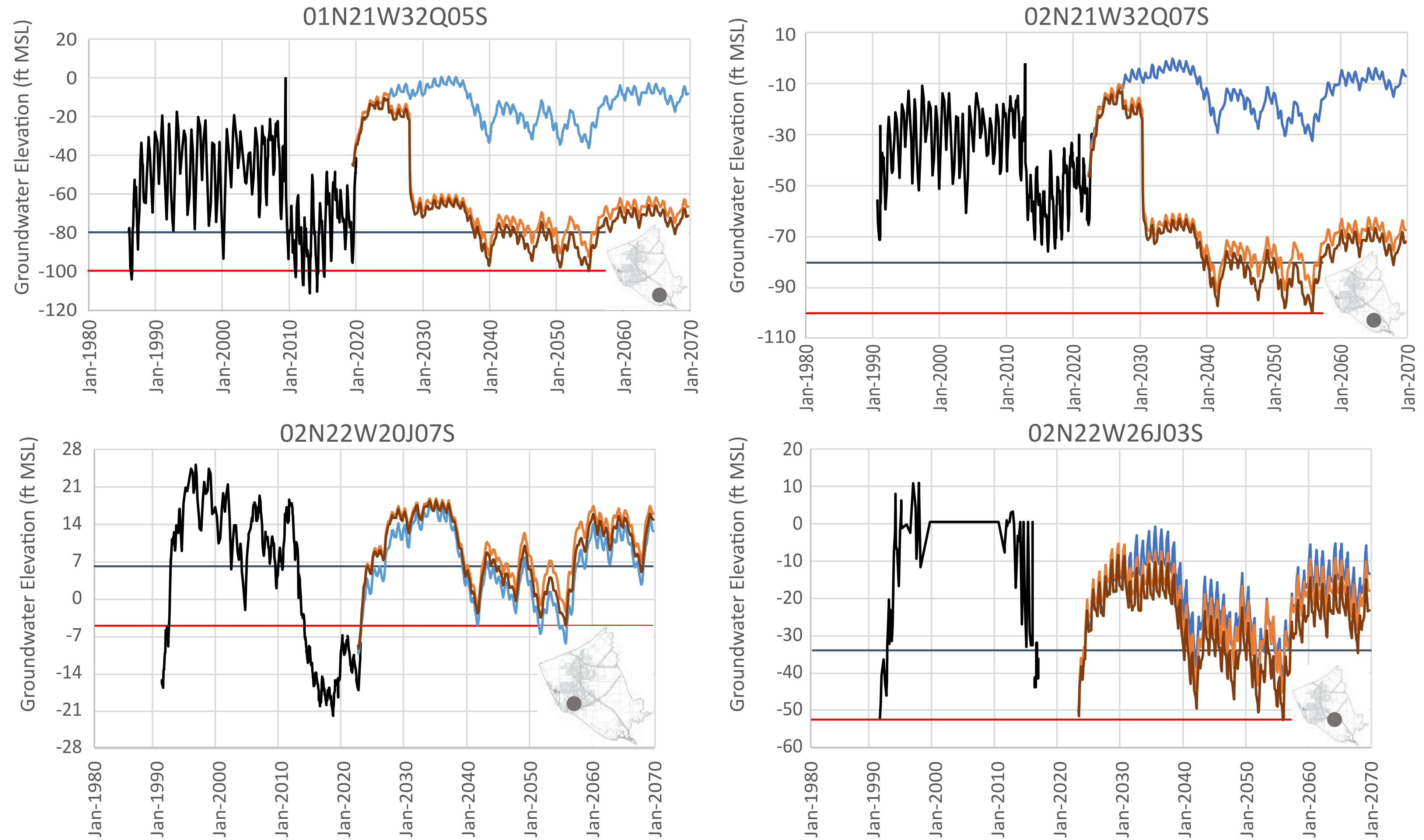

Legend

			UAS	LAS
Historical Water Level		Baseline	-40,000	-28,300
Minimum Threshold Water Level	2040 - 2069 Production (AFY)	Baseline with EBB	-50,000	-28,200
Measurable Objective Water Level		Projects with EBB	-49,400	-26,400

Note: EBB = Extraction Barrier Brackish Water Treatment Project

SOURCE: UWCD, VCWPD

FIGURE 6-8b

Key Well Hydrographs for Wells Screened in the Mugu Aquifer: EBB Scenarios

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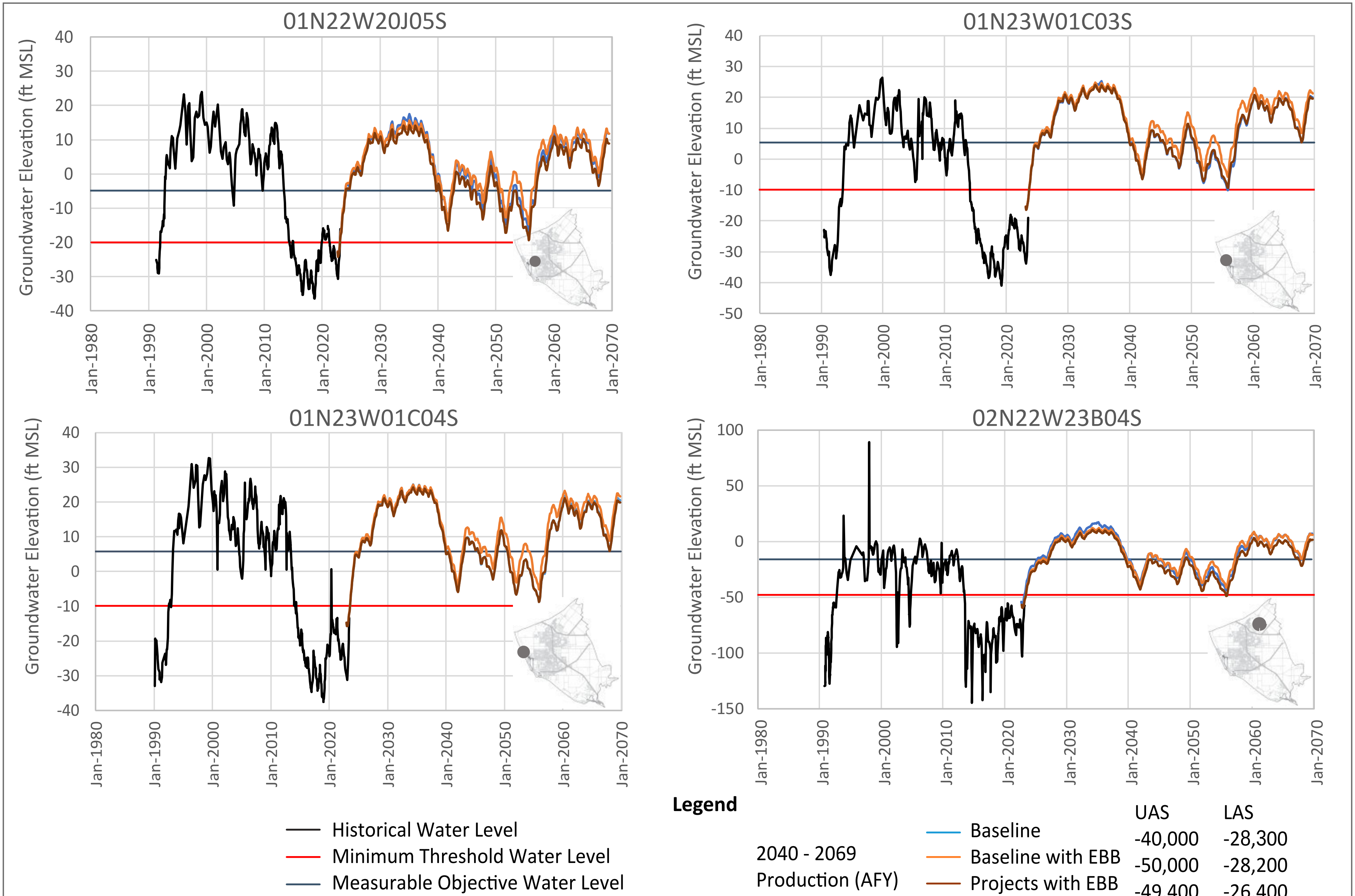

Note: EBB = Extraction Barrier Brackish Water Treatment Project

SOURCE: UWCD, VCWPD

FIGURE 6-9a

Key Well Hydrographs for Wells Screened in the Hueneme Aquifer: EBB Scenarios

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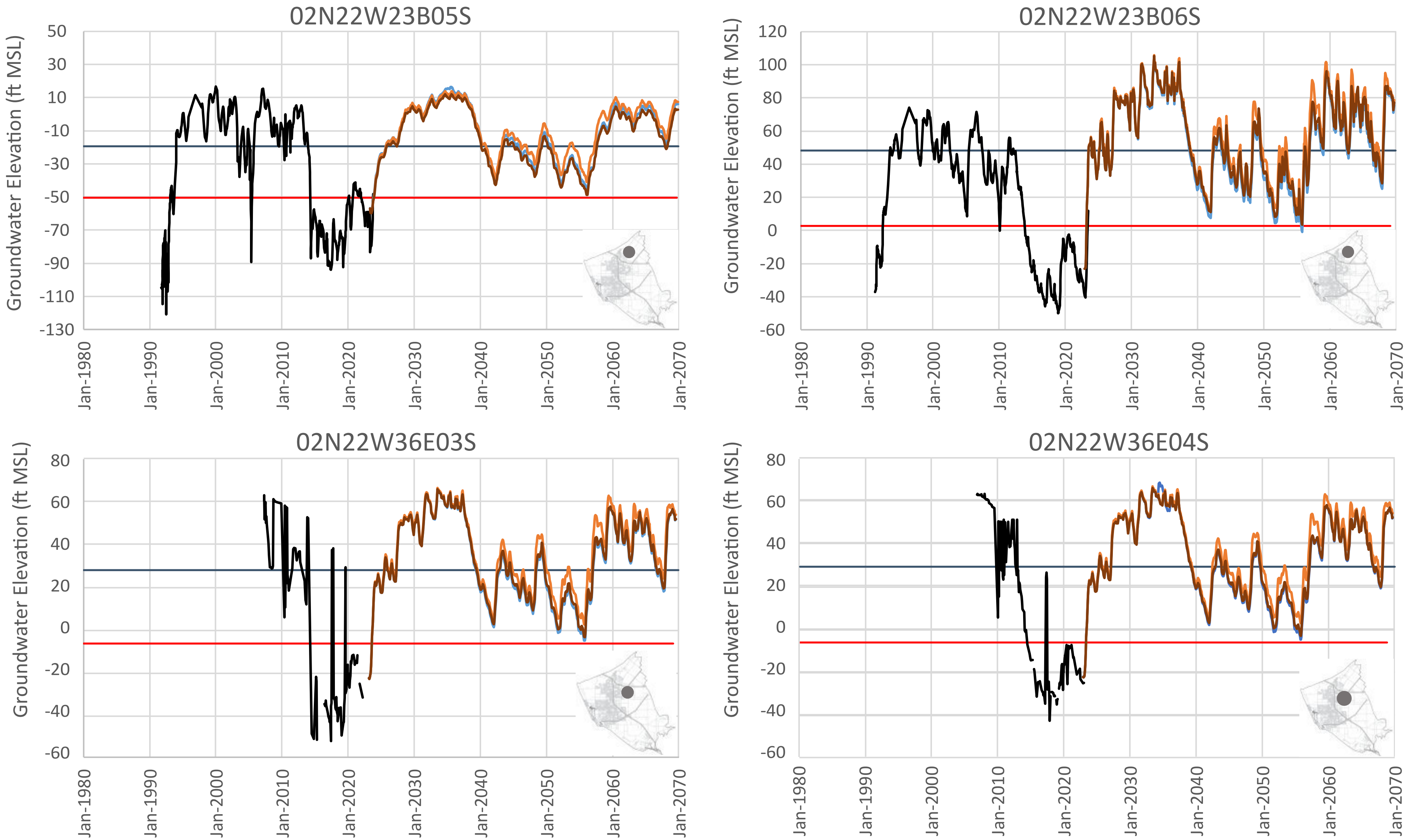

Legend

				UAS	LAS
Historical Water Level	2040 - 2069 Production (AFY)		Baseline	-40,000	-28,300
Minimum Threshold Water Level			Baseline with EBB	-50,000	-28,200
Measurable Objective Water Level			Projects with EBB	-49,400	-26,400

Note: EBB = Extraction Barrier Brackish Water Treatment Project

SOURCE: UWCD, VCWPD

FIGURE 6-9b

Key Well Hydrographs for Wells Screened in the Hueneme Aquifer: EBB Scenarios

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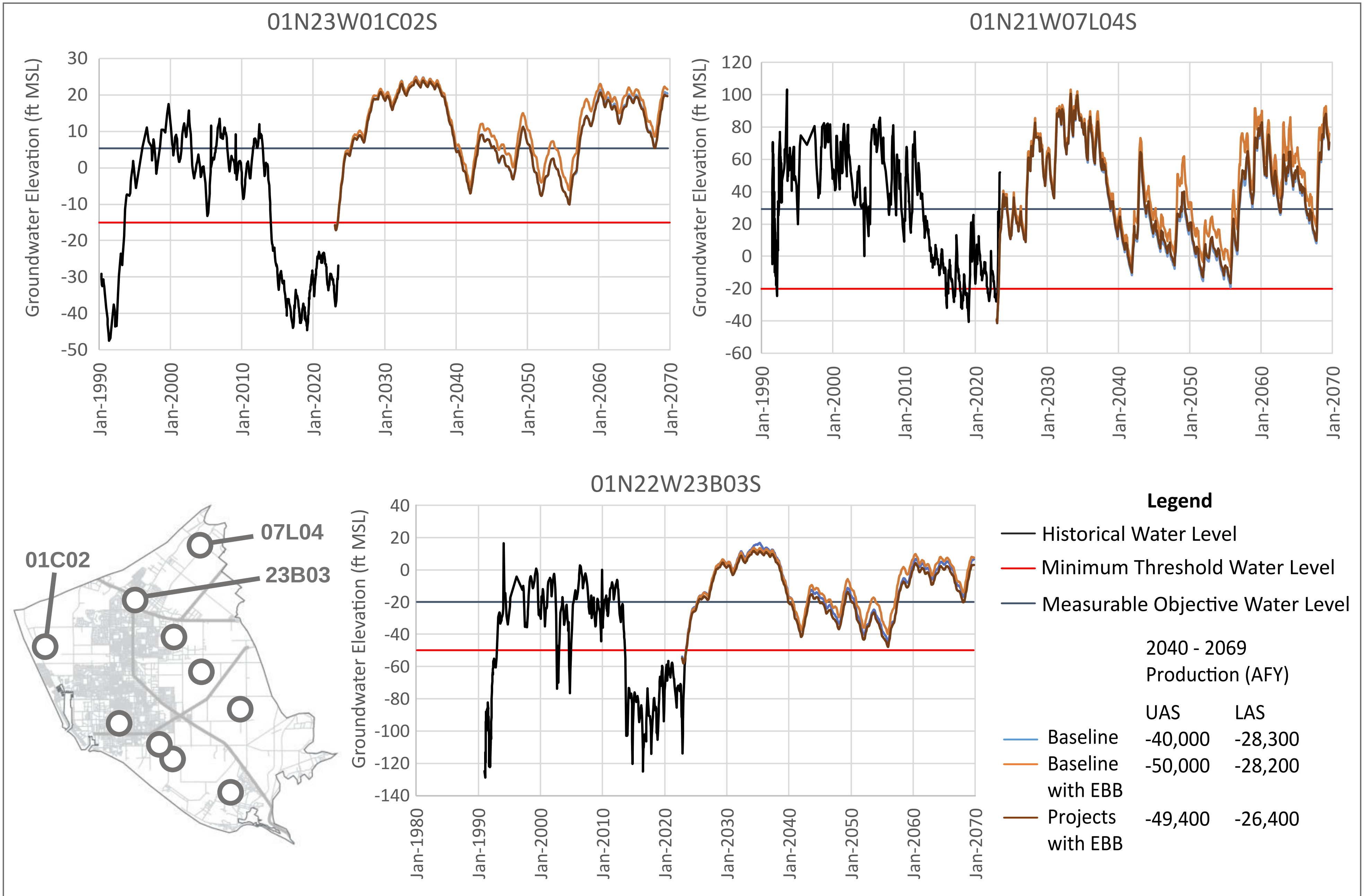

Note: EBB = Extraction Barrier Brackish Water Treatment Project

SOURCE: UWCD, VCWPD

FIGURE 6-10a

Key Well Hydrographs for Wells Screened in the Fox Canyon Aquifer: EBB Scenarios

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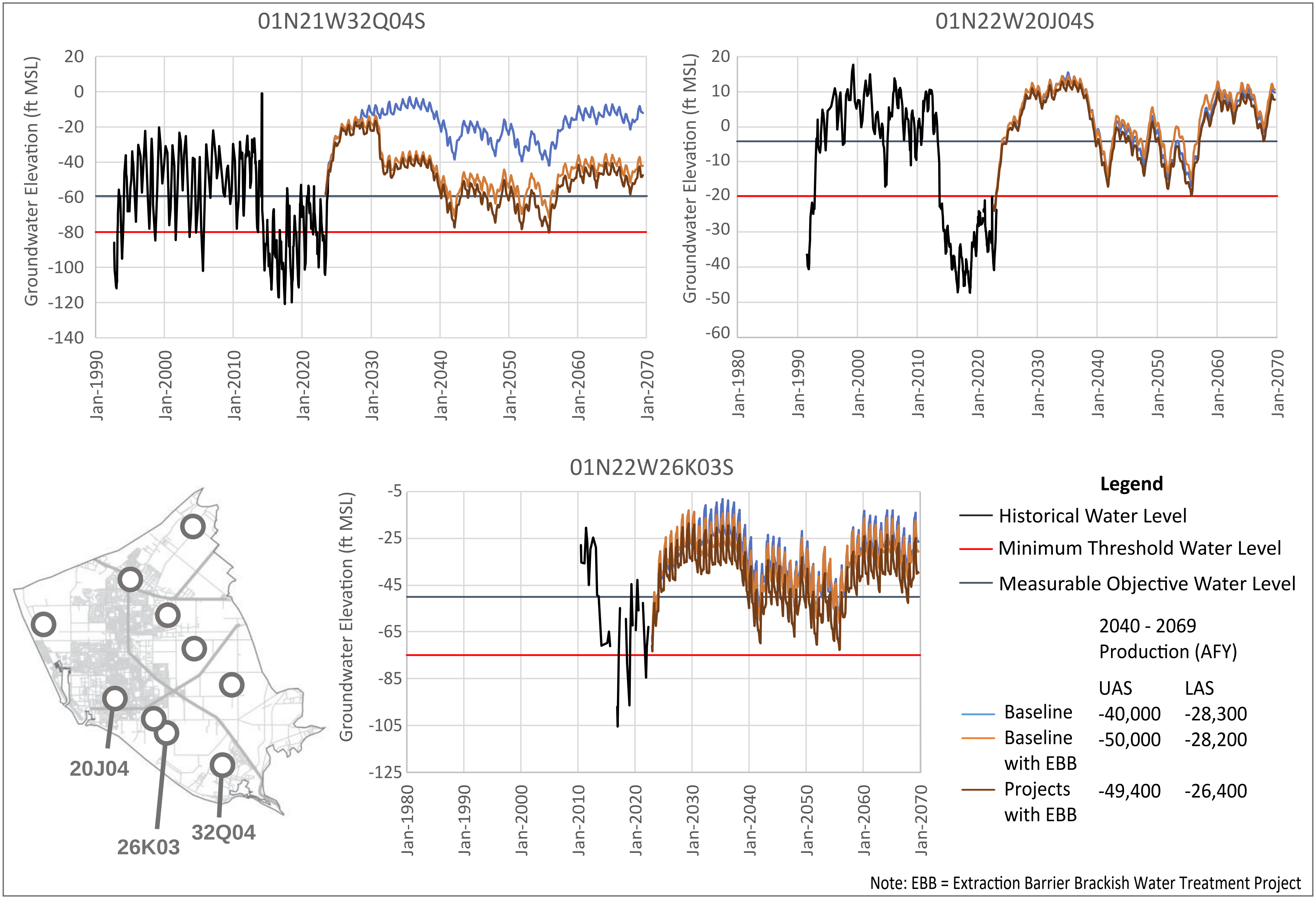

SOURCE: UWCD, VCWPD

FIGURE 6-10b

Key Well Hydrographs for Wells Screened in the Fox Canyon Aquifer: EBB Scenarios

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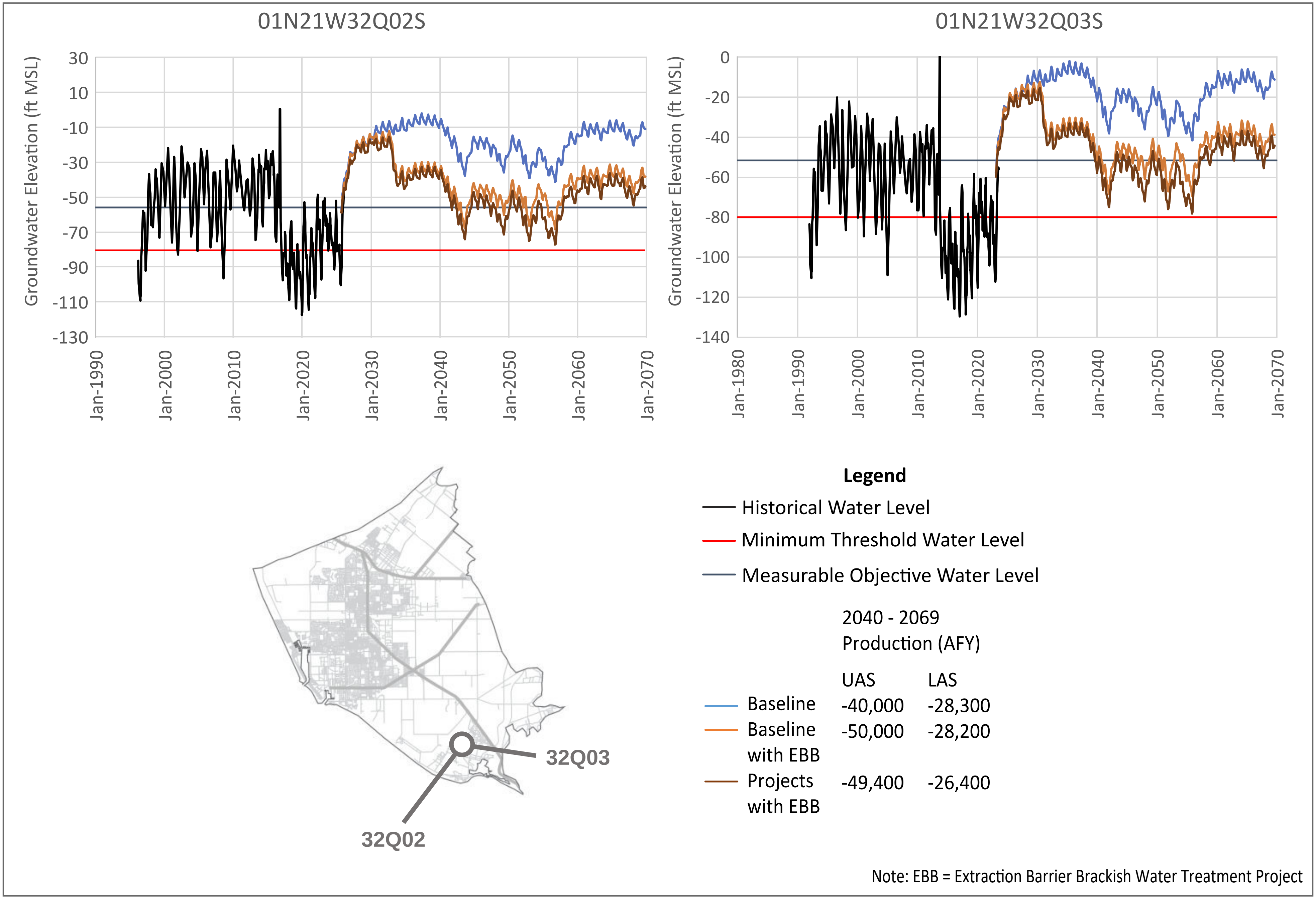

SOURCE: UWCD, VCWPD

FIGURE 6-11

Key Well Hydrographs for Wells Screened in the Fox Canyon Aquifer: EBB Scenarios

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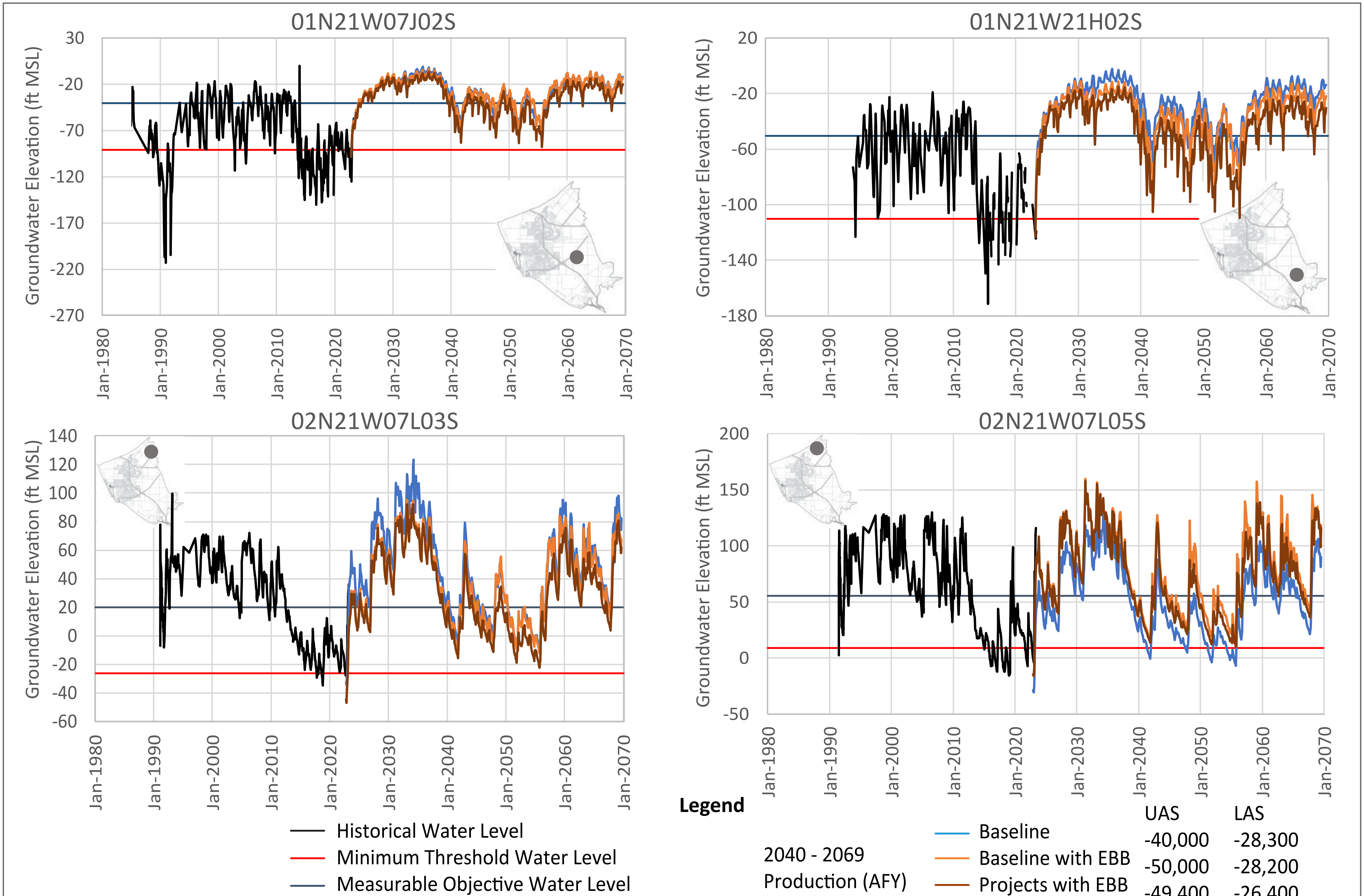

Note: EBB = Extraction Barrier Brackish Water Treatment Project

SOURCE: UWCD, VCWPD

FIGURE 6-12

Key Well Hydrographs for Wells Screened in the Multiple Aquifers: EBB Scenarios

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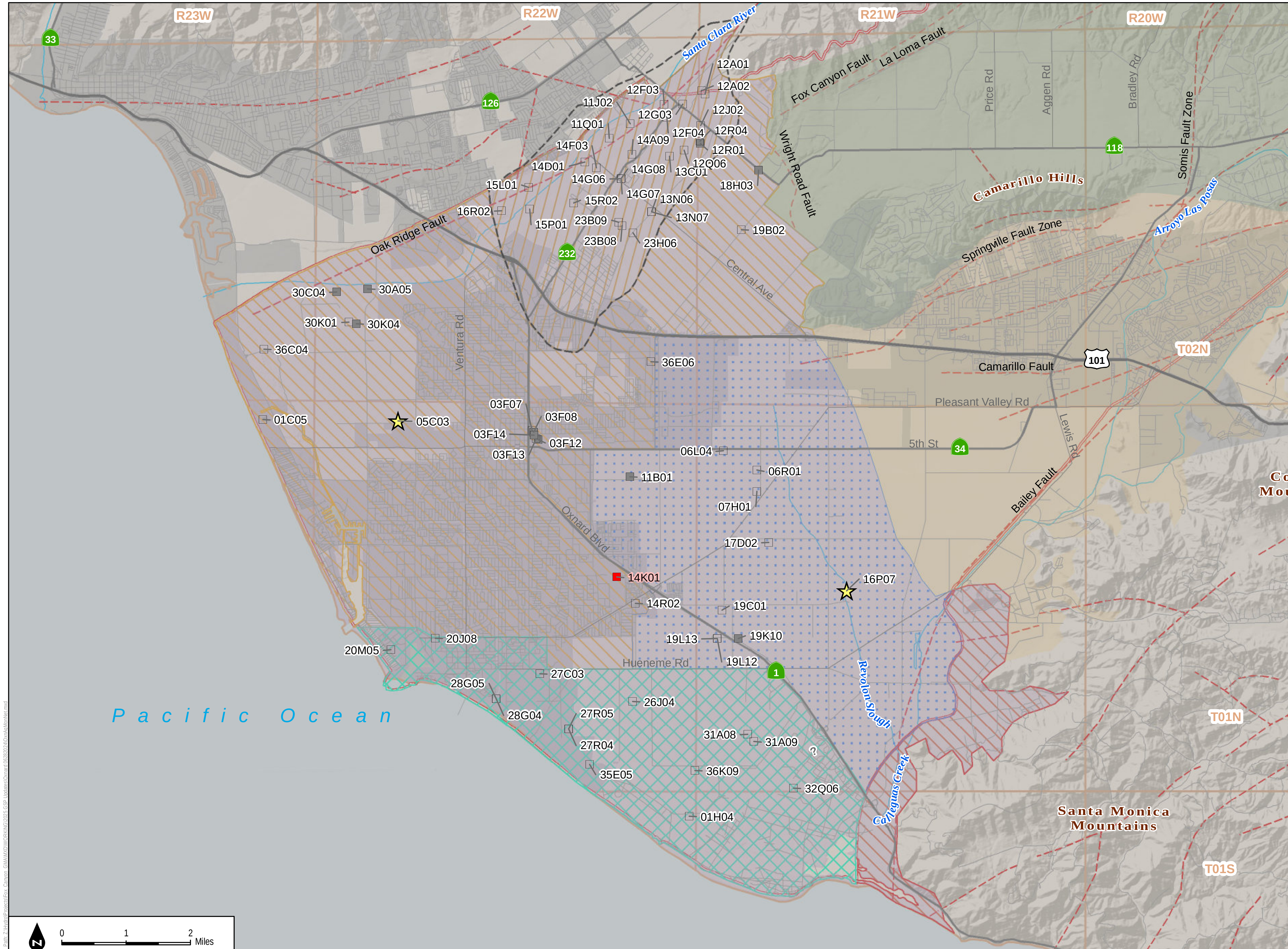

Legend

Wells Screened in the Oxnard Aquifer

- Monitored by the UWCD/VCWPD
- Not Monitored by the UWCD/VCWPD
- Wells Removed from the Network
- New wells added to Monitoring Network
- 15P01 Abbreviated State Well Number (see notes)
- Forebay Management Area
- East Oxnard Plain Management Area (EOPMA)
- Forebay Management Area
- West Oxnard Plain Management Area (WOPMA)
- Oxnard Pumping Depression Management Area
- Saline Intrusion Management Area
- Fox Canyon Groundwater Management Agency Boundary
- Faults
- Township (North-South) and Range (East-West)

Bulletin 118 Groundwater Basins and Subbasin (DWR 2018)

- Arroyo Santa Rosa Valley (4-007)
- Las Posas Valley (4-008)
- Pleasant Valley (4-006)
- Oxnard (4-004.02)

Notes:
1) Well labels consist of an abbreviated State Well Number (SWN). SWNs are based on Township and Range in the Public Land Survey System. To construct a full SWN from the abbreviation shown on the map, concatenate the Township, Range, abbreviation, and the letter "S". Example: the SWN for the well labeled "29B02" located in Township 02N (T02N) and Range 20W (R20W) is 02N20W29B02S.
2) Aquifer designation information for individual wells was provided by FCGMA, CMWD and UWCD.

SOURCE: DWR; Ventura County; UWCD; CMWD

DUDEK

FIGURE 7-1
Monitoring Network Wells Screened in the Oxnard Aquifer

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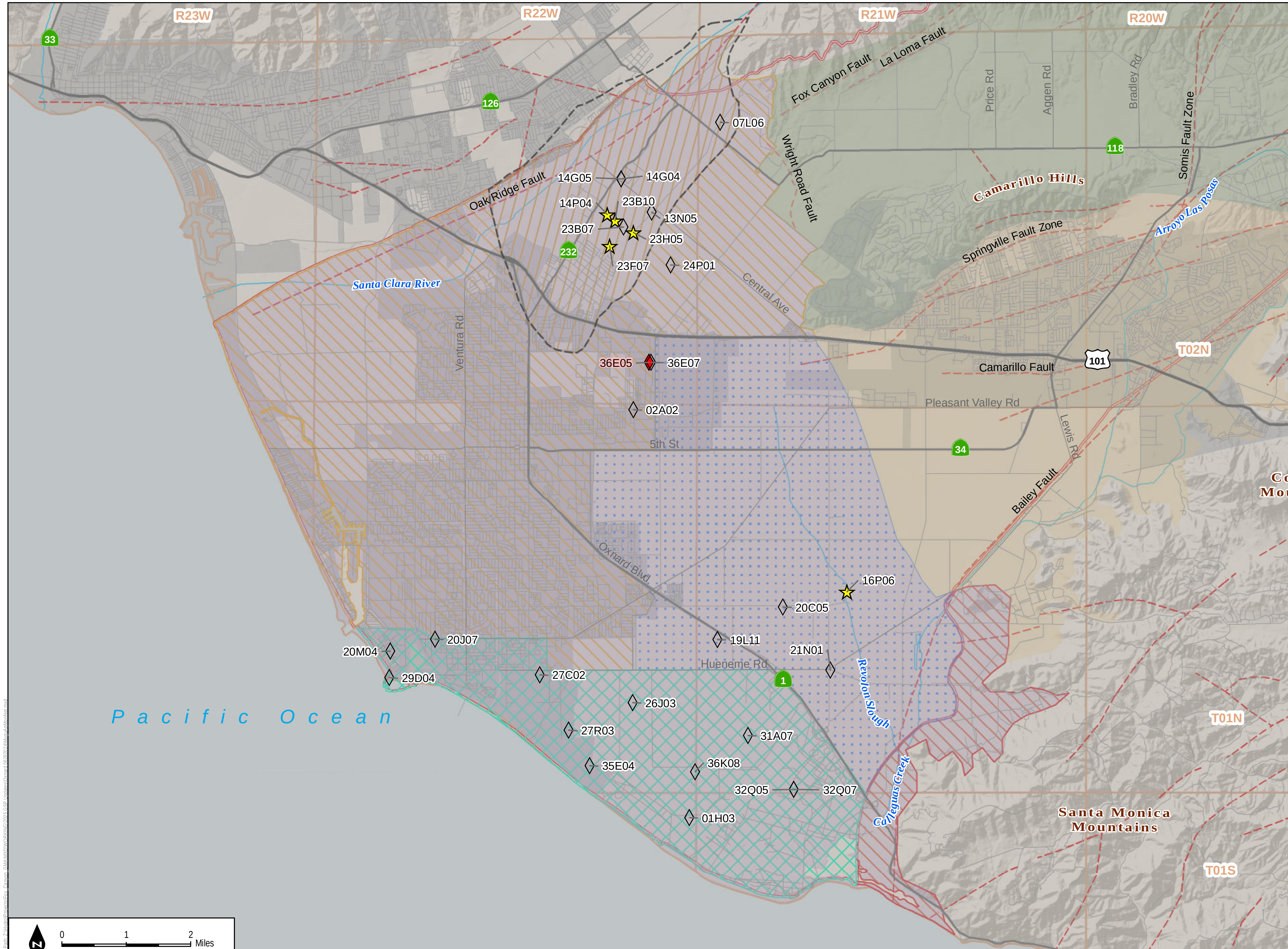

Legend

Wells Screened in the Mugu Aquifer

- Monitored by UWCD/VCWPD
- Not Monitored by UWCD/VCWPD
- UWCD Wells Removed from the Network
- New Wells to Monitoring Network

15P01 Abbreviated State Well Number (see notes)

- Forebay Management Area
- East Oxnard Plain Management Area (EOPMA)
- Forebay Management Area
- West Oxnard Plain Management Area (WOPMA)
- Oxnard Pumping Depression Management Area
- Saline Intrusion Management Area
- Fox Canyon Groundwater Management Agency Boundary
- Faults
- Township (North-South) and Range (East-West)

Bulletin 118 Groundwater Basins and Subbasin (DWR 2018)

- Arroyo Santa Rosa Valley (4-007)
- Las Posas Valley (4-008)
- Pleasant Valley (4-006)
- Oxnard (4-004.02)

Notes:
1) Well labels consist of an abbreviated State Well Number (SWN). SWNs are based on Township and Range in the Public Land Survey System. To construct a full SWN from the abbreviation shown on the map, concatenate the Township, Range, abbreviation, and the letter "S". Example: the SWN for the well labeled "29B02" located in Township 02N (T02N) and Range 20W (R20W) is 02N20W29B02S.
2) Aquifer designation information for individual wells was provided by FCGMA, CMWD and UWCD.

SOURCE: DWR; Ventura County; UWCD; CMWD

DUDEK

FIGURE 7-2

Monitoring Network Wells Screened in the Mugu Aquifer

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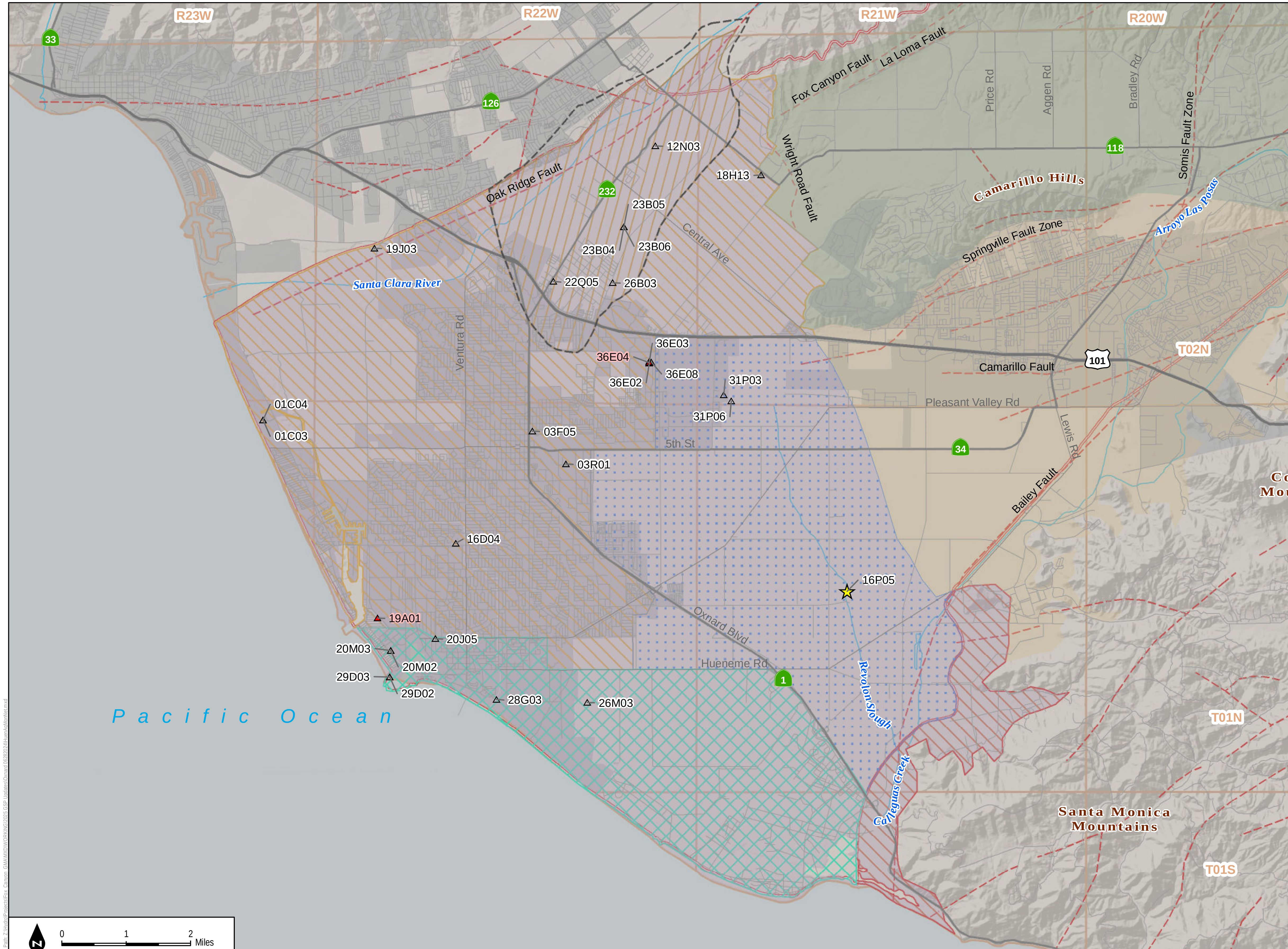

Legend

Wells Screened in the Hueneme Aquifer

- Not Monitored by UWCD/VCWPD
- Wells Removed from the Network
- Monitored by UWCD/VCWPD
- New Wells to Monitoring Network
- 15P01 Abbreviated State Well Number (see notes)
- Forebay Management Area
- East Oxnard Plain Management Area (EOPMA)
- Forebay Management Area
- West Oxnard Plain Management Area (WOPMA)
- Oxnard Pumping Depression Management Area
- Saline Intrusion Management Area
- Fox Canyon Groundwater Management Agency Boundary
- Faults
- Township (North-South) and Range (East-West)

Bulletin 118 Groundwater Basins and Subbasin (DWR 2018)

- Arroyo Santa Rosa Valley (4-007)
- Las Posas Valley (4-008)
- Pleasant Valley (4-006)
- Oxnard (4-004.02)

Notes:
1) Well labels consist of an abbreviated State Well Number (SWN). SWNs are based on Township and Range in the Public Land Survey System. To construct a full SWN from the abbreviation shown on the map, concatenate the Township, Range, abbreviation, and the letter "S". Example: the SWN for the well labeled "29B02" located in Township 02N (T02N) and Range 20W (R20W) is 02N20W29B02S.
2) Aquifer designation information for individual wells was provided by FCGMA, CMWD and UWCD.

SOURCE: DWR; Ventura County; UWCD; CMWD

DUDEK

FIGURE 7-3
Monitoring Network Wells Screened in the Hueneme Aquifer

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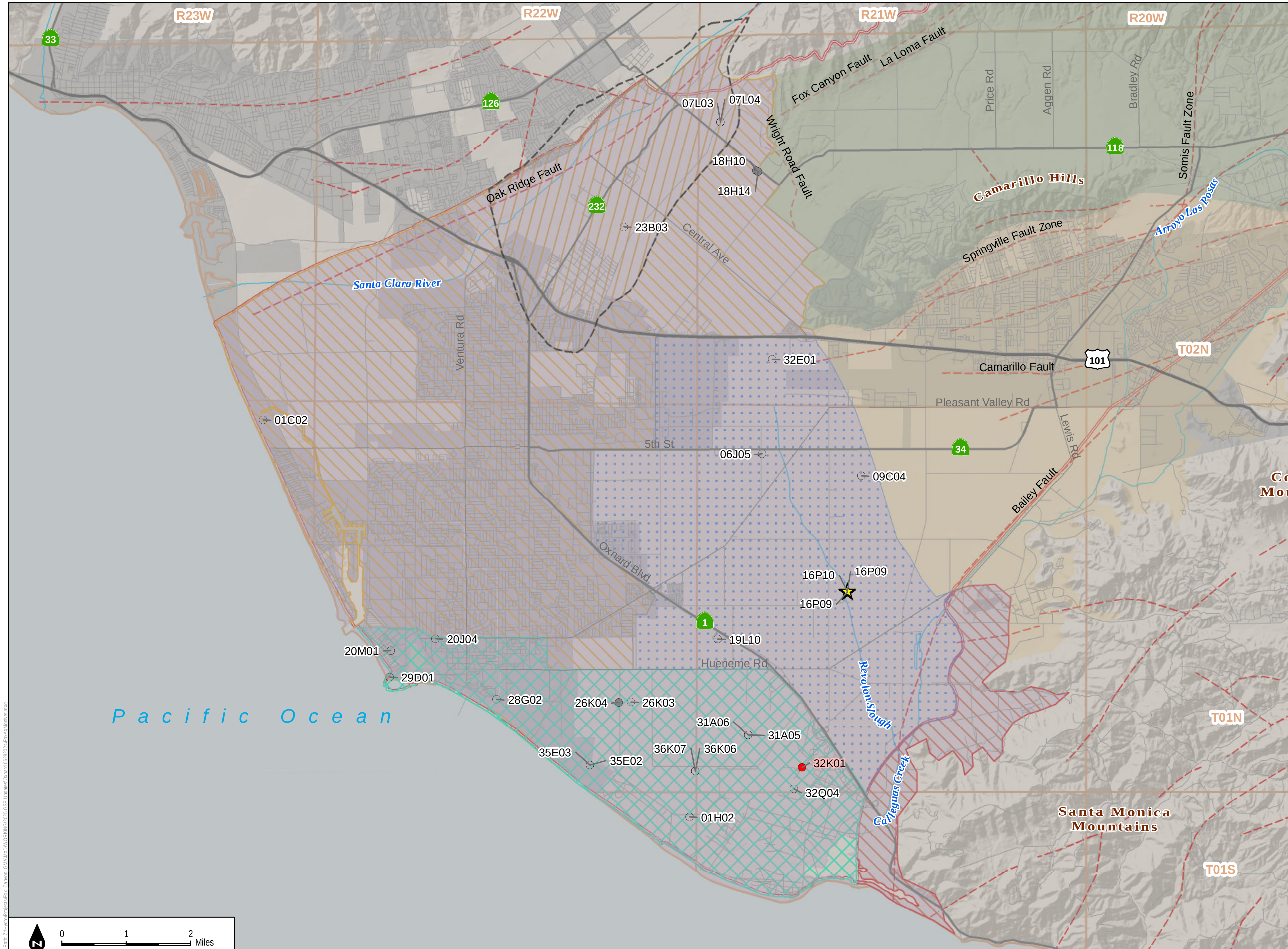

Legend

Wells Screened in the Fox Canyon Aquifer

- Monitored by UWCD/VCWPD
- Not Monitored by UWCD/VCWPD
- Wellls Removed from the Network
- New Wells to Monitoring Network

15P01 Abbreviated State Well Number (see notes)

- Forebay Management Area
- East Oxnard Plain Management Area (EOPMA)
- Forebay Management Area
- West Oxnard Plain Management Area (WOPMA)
- Oxnard Pumping Depression Management Area
- Saline Intrusion Management Area
- Fox Canyon Groundwater Management Agency Boundary
- Faults
- Township (North-South) and Range (East-West)

Bulletin 118 Groundwater Basins and Subbasin (DWR 2018)

- Arroyo Santa Rosa Valley (4-007)
- Las Posas Valley (4-008)
- Pleasant Valley (4-006)
- Oxnard (4-004.02)

Notes:
1) Well labels consist of an abbreviated State Well Number (SWN). SWNs are based on Township and Range in the Public Land Survey System. To construct a full SWN from the abbreviation shown on the map, concatenate the Township, Range, abbreviation, and the letter "S". Example: the SWN for the well labeled "29B02" located in Township 02N (T02N) and Range 20W (R20W) is 02N20W29B02S.
2) Aquifer designation information for individual wells was provided by FCGMA, CMWD and UWCD.

DUDEK

SOURCE: DWR; Ventura County; UWCD; CMWD

FIGURE 7-4

Monitoring Network Wells Screened in the Fox Canyon Aquifer

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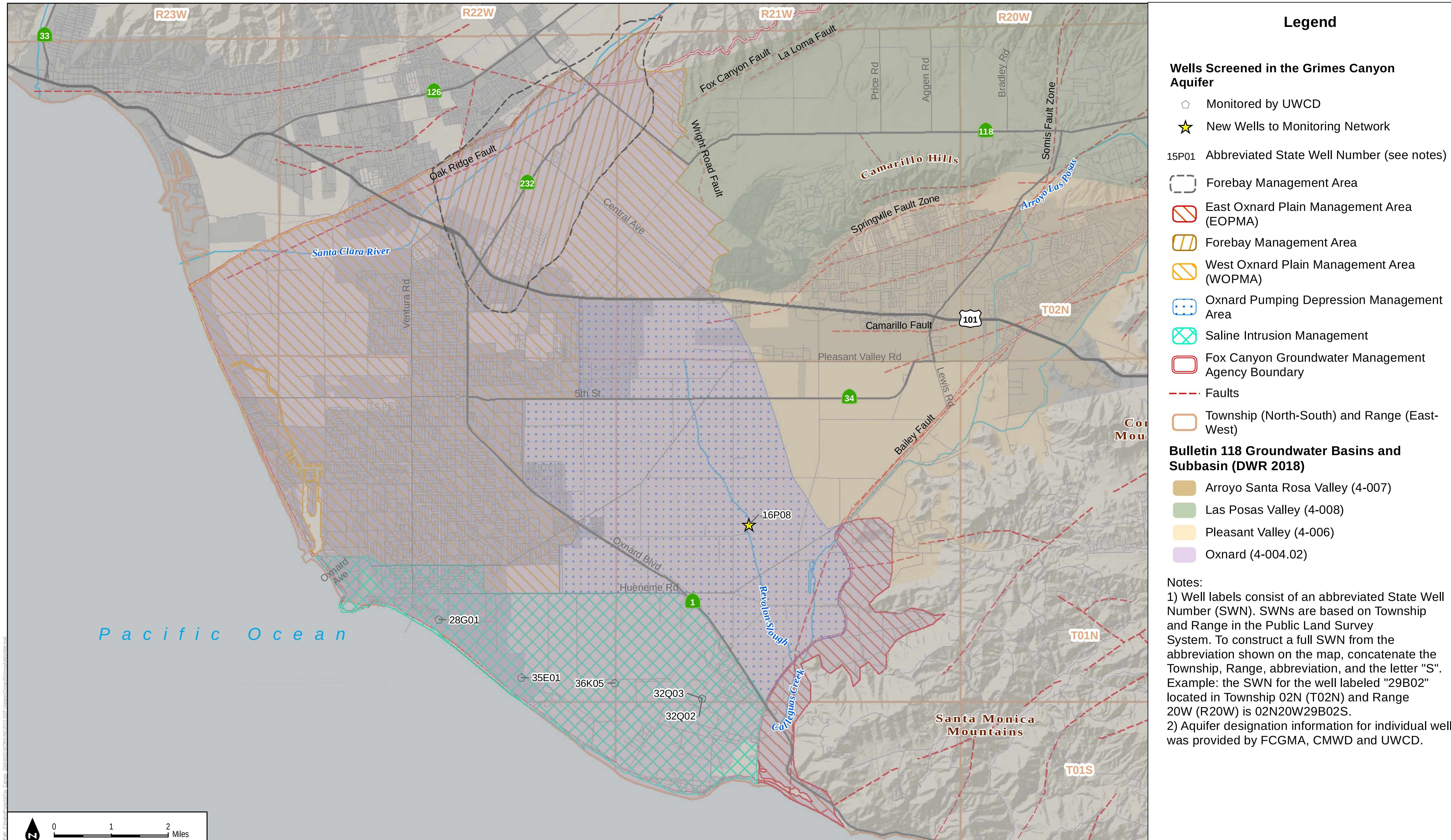

SOURCE: DWR; Ventura County; UWCD; CMWD

DUDEK

FIGURE 7-5

Monitoring Network Wells Screened in the Grimes Canyon Aquifer

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Appendix A
Comments on the Draft Periodic Evaluation

Basin	Letter Number	Commentor	Comment	Response
Oxnard	1	Christopher Anacker	Although I won't be able to attend the workshops, I do wonder whether the planning includes or can include overall earthquake resilience of the water system by creating a set of operations or procedures to be implemented post-earthquake in the area, should it ever occur.	The planning requested is beyond the scope of this document, which is limited to a review of the implementation of the groundwater sustainability plan. FCGMA, which is a groundwater management agency, does not have the independent authority to prepare this regional document addressing the resilience of the overall water system. However the comment is noted and FCGMA supports the regional collaboration that has occurred and continues to occur in order to improve water resiliency in response to natural disasters, including earthquakes. Calleguas Municipal Water District, United Water Conservation District, and others have prepared water resilience plans to address some of these concerns
Oxnard	1	Christopher Anacker	Infrastructure Vulnerability, since Earthquakes can significantly impact water infrastructure, such as: Damage to wells, pipelines, and treatment facilities Disruption of power supply needed for pumping and treatment Potential contamination of groundwater sources due to damaged infrastructure	Same as above.
Oxnard	1	Christopher Anacker	Water Supply Resilience and how earthquake activity might affect: Groundwater availability and quality post-earthquake The ability to extract and distribute water in emergency situations Potential changes in aquifer properties or groundwater flow patterns	This is a good question that is not currently addressed in the document, because it is beyond the scope of the document. The evaluation is focused on the progress made toward sustainable groundwater resource use over the last five years.
Oxnard	1	Christopher Anacker	Subsidence and Liquefaction, looking at Earthquake-induced ground movements that can exacerbate issues related to: Land subsidence, which may already be a concern due to groundwater extraction Soil liquefaction, particularly in areas with high groundwater tables	The GSP evaluation is focused on the relationship between groundwater extraction and land subsidence. The potential for subsidence or liquefaction as a result of an earthquake is beyond the scope of this document.
Oxnard	1	Christopher Anacker	Interconnected Surface Water as seismic activity could potentially alter: The relationship between groundwater and surface water bodies Streamflow patterns and groundwater recharge rates	In the event that an earthquake impacts the relationship between groundwater and surface water in the basins, future plan updates will have to incorporate those changes into an updated hydrogeological conceptual model.
Oxnard	1	Christopher Anacker	Long-term Sustainability that incorporates earthquake considerations to ensure:The resilience of water supply systems in the face of natural disastersThe ability to maintain sustainable groundwater management practices evenafter seismic events	The planning requested is beyond the scope of this document, which is limited to a review of the implementation of the groundwater sustainability plan. FCGMA, which is a groundwater management agency, does not have the independent authority to prepare this regional document addressing the resilience of the overall water system. However the comment is noted and FCGMA supports the regional collaboration that has occurred and continues to occur in order to improve water resiliency in response to natural disasters, including earthquakes. Calleguas Municipal Water District, United Water Conservation District, and others have prepared water resilience plans to address some of these concerns
Oxnard	1	Christopher Anacker	Monitoring and Data Collection that include provisions for: Monitoring wells and other data collection systems that can withstand seismic activity Rapid assessment of groundwater conditions following an earthquake	Many of the monitoring wells have pressure transducers that record groundwater elevations regularly and will provide the most complete record of groundwater response to earthquakes.
Oxnard	2	VCFB	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.	Noted. Thank you for your comment.

Basin	Letter Number	Commentor	Comment	Response
Oxnard	2	VCFB	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.	Agreed. The agency has been collaborating with stakeholders and local agencies to develop additional projects to capture surface water when it's available and evaluate how to optimize the use of available water resources.
Oxnard	2	VCFB	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 extractionlimits, which would have severe economic consequences for farmers.	A discussion of demand management is a required component of the GSP evaluation and is one way, of many, to bring the basin into sustainability. However, the agency supports project development to limit the need for demand management. As noted above, the agency has been collaborating with stakeholders and local agencies to develop additional projects to capture surface water when it's available and evaluate how to optimize the use of available water resources.
Oxnard	2	VCFB	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.	Noted. Thank you for your comment.
Oxnard	2	VCFB	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.	Noted. FCGMA supports project development to limit the need for demand management and agrees that UWCD's EBB project has the potential to create additional long-term water supplies within the basins.
Oxnard	2	VCFB	5. Economic Impact on Agriculture Ground water 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.	Noted. As projects move forward, additional economic analysis of each project will need to be developed to provide stakeholders and the Board with the information required to make informed determinations on cost-effectiveness.
Oxnard	2	VCFB	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	The GSP includes a project on temporary fallowing. Additional projects are listed in the periodic evaluation. As noted above, the agency has also been collaborating with stakeholders and local agencies to develop additional projects to capture surface water when it's available and evaluate how to optimize the use of available water resources.

Basin	Letter Number	Commentor	Comment	Response
			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, winwin solution that allows farmers to respond to changing conditions without jeopardizing their livelihoods. While implementation of these ideas is not feasible in the next fiveyears, planning and development could be undertaken including grant-funding cycles such at 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.	
Oxnard	2	VCFB	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.	Noted. The agency remains committed to providing a clear management framework, informed and shaped by stakeholders, to minimize uncertainty and instability.
Oxnard	2	VCFB	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	Noted. The agency remains committed to involving all stakeholders in management decisions, and recognizes the importance of agricultural stakeholders in the basins. Agricultural stakeholders regularly participate in Board committee planning meetings and provide comments at Board meetings.

Basin	Letter Number	Commentor	Comment	Response
			adjustments to water usage may be easier, farming operations are less flexible, making it essential that proposed projects accommodate these constraints.	
Oxnard	3	UWCD	United Water Conservation District (United) appreciates the opportunity to review the August 2024 drafts of Fox Canyon Groundwater Management Agency's (FCGMA) First Periodic Evaluations of the Groundwater Sustainability Plans (GSPs) for the Oxnard Subbasin, Pleasant Valley (PV) Basin, and Las Posas Valley (LPV) Basin (the 5-Year GSP Evaluation Draft Documents), prepared by your consultant, Dudek, and released for public review and comment on September 6, 2024. United appreciated the opportunity to significantly contribute to development of these evaluations through the groundwater flow modeling we conducted for the FCGMA, and appreciated the helpful, cooperative engagement with your staff and Drs. Jones and Weinberger of Dudek during that effort. And finally we are impressed with the content and quality of the documents, as well as the presentations given by FCGMA and Dudek staff at the related workshops hosted by FCGMA. In the spirit of cooperation and collaboration, United staff respectfully submit the following comments and questions on the 5-Year GSP Evaluation Draft Documents with the hope that the FCGMA and Dudek will find them helpful in producing the highest-quality final documents possible.	Noted. Thank you for your comment.
Oxnard	3	UWCD	1. Because of the efforts made by United, Pleasant Valley County Water District (PVCWD), Camrosa Water District, the Cities of Oxnard, Camarillo, and Ventura, and FCGMA to aggressively design and implement new water supply sources since release of the original GSPs in 2020, sustainable yields of the Oxnard and PV (OPV) basins have improved significantly, as noted in the 5-Year GSP Evaluations. Additionally, the recent two years of high rainfall (wet years) certainly helped groundwater elevations move upward toward the measurable objectives (MOs) and minimum thresholds (MTs) established in the GSPs, as did reductions in pumping in the basins.	Noted. Thank you for your comment.
Oxnard	3	UWCD	Furthermore, the 5-Year GSP Evaluations showed that there is one (and only one) path forward—the "Future Baseline with EBB" scenario—that can achieve sustainability in the OPV basins, halt and reverse seawater intrusion in the southern Oxnard basin, while avoiding a rampdown of pumping that would likely cause significant harm to the people, businesses, and other stakeholders in Ventura County. The projects included in this scenario also will bring improvements to the reliability (resilience) of local supplies, groundwater quality, and our ability to adapt to potential climate-change impacts in the coming years.	FCGMA recognizes that the EBB project has the potential to play a key role in helping to reach sustainability and has supported the EBB project with subgrants and letters of support. FCGMA notes, however, that it does not believe the EBB project is the only path by which the basins can reach sustainability. Further, due to the tremendous cost and significant risks to full EBB implementation, FCGMA believes it prudent to consider contingency projects to achieve sustainability.
Oxnard	3	UWCD	We encourage the FCGMA to emphasize in its statements and documents that groundwater conditions in the OPV basins are improving substantially thanks to the efforts of several agencies, and to support the one future scenario—"Future Baseline with EBB"—that is demonstrated to achieve groundwater sustainability without requiring a harmful rampdown in groundwater supply.	Noted. FCGMA remains committed to supporting projects that limit the need for demand management.
Oxnard	3	UWCD	2. Page ES-2, second paragraph: For clarity, we suggest adding "for United's conjunctive use and groundwater recharge operations" at the end of the existing sentence that reads "The wetter than average 2023 and 2024 water years resulted in increased availability of Santa Clara River surface water diversions."	Added.
Oxnard	3	UWCD	Page ES-2, third paragraph: The last sentence of this paragraph includes the statement "As anticipated in the GSP, numerical modeling data suggests that since 2015, approximately 140,000 acre-feet of groundwater was added to the Subbasin…" It would be helpful to include an ending year in the statement (e.g., "from 2015 through 2022" or whatever year is appropriate), because significantly more than 140,000 acre-feet of groundwater was recharged to the Oxnard subbasin since 2015 if the most recent two years (2023 and 2024) are included.	language was revised and 2022 was added
Oxnard	3	UWCD	Page ES-3, second paragraph: The first sentence of this paragraph states "Since adoption of the GSP, agencies in the Subbasin, with support from FCGMA, have begun delivering recycled water for agricultural irrigation." United's understanding is that recycled water has been delivered by Oxnard for agricultural irrigation since 2016, three years prior to the 2019 adoption of the GSP for Oxnard subbasin.	language revised to 2016
Oxnard	3	UWCD	Page ES-3, last paragraph: This paragraph summarizes changes in sustainable yield and overdraft. We suggest adding a sentence at the end of this paragraph along the lines of "This is an improvement from	The text has been revised to include a discussion of the difference between the GSP and the GSP evaluation estimates of overdraft.

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			the state of overdraft as of 2020, due largely to…" and then explain why current estimates of overdraft are significantly smaller than estimated overdraft as of 2019.	
Oxnard	3	UWCD	Table 1-1: Under the "Future Projects" section of this table, "Purchase of Supplemental State Water Project (SWP) Water" is listed. United has been purchasing supplemental SWP water since 2017; therefore, we recommend moving this project up to the "Projects that are currently being implemented" section of Table 1-1.	Moved.
Oxnard	3	UWCD	Page 22, last paragraph: To be more precise, we suggest changing the first sentence of this paragraph to "UWCD's updated interpretation indicates that the saline water impact front migrated landward from 2015 to 2020." United's interpretation did not include evaluation of migration of the seawater intrusion front after 2020.	Changed.
Oxnard	3	UWCD	Page 25, last paragraph: In the second sentence of this paragraph, it would be helpful to specify whether the listed nitrate concentrations are as nitrogen, or as nitrate. Both reporting bases are commonly used in water quality analysis, but the significance of the results can be quite different depending on which reporting basis is used	"as nitrate" added
Oxnard	3	UWCD	Page 38, first paragraph of Section 3.1.2.4.1: We recommend adding "to be used in lieu of groundwater pumping" at the end of the first sentence, to inform the reader of the value of surface-water deliveries in improving groundwater conditions.	Added.
Oxnard	3	UWCD	Table 3-2: For Project 7, the Laguna Road Recycled Water Pipeline Interconnection, United is now forecasting completion of Phase 1 in early 2025, rather than 2024. This is new information from United, not a mistake in the document	Changed.
Oxnard	3	UWCD	Page 45: In Section 3.2.2.2, under "Expected Benefits," line 4, we recommend removing the word "additional." The PTP system has not previously received recycled water.	Changed.
Oxnard	3	UWCD	Page 46, Section 3.2.3.1: United has updated information regarding the EBB project, as follows. United's current description of EBB design and construction phasing includes the monitoring well construction as part of the design phase. Phase 1 is considered the construction of the initial extraction well field and discharge facilities. Approximately seven (7) wells will be constructed in the Phase 1 extraction well field. The field will be operated to produce and average of approximately 3,500 AFY in total. Design production from each individual well will be based on conditions observed during drilling. The second phase of EBB consists of design and construction of the treatment plant, conveyance system to distribute treated water, a connection to the Calleagus Salinity Management Pipeline, and expansion of the extraction wellfield to accommodate approximately 10,000 AFY of extraction. Currently, United anticipates thirteen (13) additional wells will be required.	Changed.
Oxnard	3	UWCD	Page 47, first paragraph of Section 3.2.4.2: Consider modifying the second sentence of this paragraph to the following, which more accurately reflects United's purchases of supplemental SWP water since 2019: "Between 2019 and 2023, UWCD purchased an additional 29,329 AF of supplemental State Water (transfers, exchanges and Article 21 water). This water was released from Lake Piru and Castaic Lake for recharge in the Santa Clara River Valley basins (Piru, Fillmore and Santa Paula) and for recharge and delivery in the Oxnard Subbasin and PVB.	Revised.
Oxnard	3	UWCD	Pages 53 and 54: Both "Project No. 16" and "Project No. 17" refer to formation of seawater intrusion barriers as a result of injection of recycled water along the coast. Please provide information regarding whether these projects are distinct from each other, and whether their impacts would be additive, complementary, or alternatives that would not operate simultaneously.	These are the descriptions provided by the project proponent. The benefits have not yet been quantified. As these projects continue to be analyzed the information requested will be developed.
Oxnard	3	UWCD	Page 55: Who would conduct the feasibility study envisioned in "Project No. 18?" When is it anticipated to be completed, and at what cost? The discussion presented in the Draft Document states "If the project is found to be feasible and is constructed, it will increase sustainable yield in the Subbasin, and thus have a positive impact on beneficial uses and users. Project impacts are intended to increase sustainable yield for all users." It seems more consistent to consider both benefits and impacts of a paper study neutral. Actual pumping optimization may have benefits for the basin, e.g., increasing sustainable yield, but significant impact to stakeholders in areas of the basin where pumping would be curtailed.	The details of the study cost, completion, and proponent are not yet know. The language has been changed to eliminate the discussion of potential benefit because it is a paper study.

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Oxnard	3	UWCD	Page 70, second paragraph of the "Comparison to Historical Groundwater Supplies" section: For context, it would be helpful to remind the reader that the 2016 through 2022 period was dominated by drought, and very little surface water from the Santa Clara River was available for conjunctive-use deliveries to agriculture in the Oxnard subbasin. This explains the increased groundwater extractions from the UAS relative to the 1985-2015 average period.	Added.
Oxnard	3	UWCD	Page 77, second sentence of Section 5.1.3: Suggest modifying the text to the following to more accurately describe the model extension and recalibration: "This recalibration effort involved incremental adjustments to local hydraulic conductivity and general head boundary conditions (GHB), which resulted in better simulation of groundwater conditions along the coastline (details to be included in UWCD's Coastal Plain Model update technical memorandum)."	Changed.
Oxnard	3	UWCD	Table 5-1: We have a question and suggestions as follows: The first line indicates 50,000 AFY of projected future water supply/in lieu delivery for managed aquifer recharge (MAR) by United. However, the baseline 2070 model output indicated 60,300 AFY of MAR. Why does this 10,300 AFY difference exist? ▪ It looks like notes "b" and "c" should become "d" and "e." ▪ Notes "b" and "c" need to be updated/included to properly note AWPF. Currently "b" and "c" refer to Camarillo Desalter.	Table 5-1 has been updated to: (i) update the estimates of Santa Clara River and recycled water availability, (ii) correct errors in the footnotes. The value referenced for MAR represents the volume of surface water diverted at the Freeman Diversion and delivered to the Saticoy, Noble, Rose, Ferro, and El Rio basins over the period from water year 2040 through 2069. These water supply estimates are based on the UWCD Surface Water Distribution Model results provided for the Baseline conditions with 2070 climate change factors.
Oxnard	3	UWCD	Page 95: In Section 5.2.3, under "Sustainable Yield with UWCD's EBB Water Treatment Project," the following statement is made: "...the simulation with the highest overall production rate was used as the estimate of sustainable yield of the Subbasin if UWCD's EBB Water Treatment project is successfully implemented as described in Section 5.2.2.6, Extraction Barrier and Brackish Water Treatment Scenario." It would be helpful to add a sentence clarifying that the sustainable yield of the basin under this scenario is likely higher than indicated, but was limited to the maximum assumed pumping rate.	Revised.
Oxnard	4	NBVC	Section 5.1 and 5.3: FCGMA should clarify the data sources used for recalibration and how new monitoring data were integrated. Recommend conduction sensitivity analyses to address uncertainties in seawater intrusion and sustainable yield projections for the Oxnard Subbasin GSP.	UWCD conducted the recalibration exercise and FCGMA understands that the model is calibrated to measured groundwater elevations. Sensitivity analyses should be conducted in the future, but the change in the understanding of the relationship between groundwater elevation and seawater intrusion is anticipated to be similar to that established in the GSP.
Oxnard	4	NBVC	Section 5.2 and 2.2.3: 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.	Noted. The GSP provides an extensive discussion of uncertainty.
Oxnard	4	NBVC	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.	Uncertainty is discussed in detail in the GSP. UWCD has indicated that the model was not substantially updated since the GSP was prepared. The uncertainty analysis for the GSP is sufficient to understand the uncertainty in the updated model predictions.
Oxnard	4	NBVC	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.	FCGMA has management actions to reduce groundwater production if projects are insufficient to bring the basin into sustainability.
Oxnard	4	NBVC	Section 5.2.1: FCGMA should expand climate modeling to account for natural disasters and extreme weather evets (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	An evaluation of the need for model scenarios to account for changing climate and extreme weather events can be undertaken over the next five years. This, however, is outside the scope of the periodic evaluation, which focuses on the progress toward sustainability achieved since the GSP was submitted.
Oxnard	4	NBVC	Section 2.2.4 and 5.2: Section 2.2.4 (Degraded Water Quality) and Section 5.2 (Future Scenario Water 5.2 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. Section 5.2 of the Draft Evaluation Report needs to clarify how future	Seawater intrusion and water quality degradation are two separate sustainability indicators, as groundwater production can cause groundwater quality degradation even in areas that do not experience seawater intrusion. The current model does not directly include water quality changes related either to over production or to seawater intrusion. Instead, FCGMA relies on the linkage

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			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.	between groundwater levels and groundwater quality because SGMA allows for water levels to be used as a proxy for other sustainability indicators where a link can be established. A discussion of the need for explicit groundwater quality modeling can be undertaken over the next five years to understand if this is necessary for ongoing management of the basin.
Oxnard	4	NBVC	Section 6 (Sustainable Management Criteria "SMC"): The Draft report discusses revisions to SM Cs for water quality and seawater intrusion but needs additional clarification explaining the revisions to the SMCs for this section of the GSP.	This text has been revised. In response to stakeholder feedback, the recommended revisions to the SMCs have been withdrawn.
Oxnard	4	NBVC	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.	The different model scenarios conducted for the GSP evaluation indicate the relative influence of various factors on seawater intrusion. The GSP has more detail on how the model reacts to changing climate.
Oxnard	4	NBVC	Section 7 Recommend providing clearer response framework for when/if land subsidence 7.2.3 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.	As long as FCGMA is able to bring groundwater levels above the minimum thresholds, it is unlikely that subsidence resulting from groundwater production will occur in the Oxnard Subbasin because the minimum thresholds are higher than the historical low groundwater levels. However, FCGMA has included direct InSAR data in the overall basin monitoring to confirm that subsidence related to groundwater production is not causing significant and unreasonable impacts to surface infrastructure.
Oxnard	4	NBVC	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.	InSAR has been included in the monitoring network. Land subsidence related to groundwater withdrawal is a slow process that is linked to groundwater levels declining below historical lows. This is not expected to occur in the Oxnard Subbasin under sustainable management.
Oxnard	4	NBVC	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.	Noted. FCGMA remains committed to fiscally responsible, transparent management that includes all stakeholders.
Oxnard	4	NBVC	Section 7.4 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.	The primary goal of monitoring the GDEs is to establish the relationship between the groundwater elevations in the semi-perched aquifer, the interaction between this aquifer and the underlying groundwater production aquifers, and how those interactions impact groundwater dependent ecosystems. The groundwater model is a basin-scale model, which is appropriate for SGMA evaluations. Therefore, it is not used to predict local interactions between aquifers at specific GDE locations. Monitoring well data will be used to make these connections instead.
Oxnard	4	NBVC	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.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 GD Es for the Oxnard Subbasin.	Data gaps are being addressed through the installation of monitoring wells.
Oxnard	4	NBVC	Section 8.0 and 8.3: 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. 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. 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	The descriptions of projects in the evaluation is sufficient for SGMA. FCGMA has established an annual process to solicit and develop projects that can be incorporated into the GSP evaluations and amendments. FCGMA agrees that the level of detail requested will be required as agencies develop the projects further and request funding for these projects. The current level of detail provided is commensurate with the stage of the individual project.

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			strategies, and pathways {o dissolve risks-impacts-challenges through collaboration in unison with all parties/users.	
Oxnard	4	NBVC	Section 9.1: 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.	FCGMA agrees with the suggestion to expand the focus on stakeholder feedback in disadvantaged communities. FCGMA has developed multi-lingual materials through coordination with DWR's translation service. Additionally DWR has several outreach efforts targeted to disadvantaged communities that FCGMA is interested in participating in. FCGMA remains committed to engaging these communities.
Oxnard	5	City of Oxnard	1. It is not clear if the Periodic Evaluation of Groundwater Sustainability Plan (Periodic Evaluation) for the Oxnard Subbasin (Basin) complies with the California Department of Water Resources (DWR) A Guide to Annual Reports, Periodic Evaluations, and Plan Amendments (Guidance) with respect to the description of the progress on the Projects and Management Actions (PMAs) within the Basin:· Per the Guidance: “The discussion of the projects should include evaluations and reporting on the quantified benefits of each project and anticipated benefits of the projects that broke ground or were completed during the evaluation cycle.”· Per the Groundwater Sustainability Plan (GSP) Regulations § 356.4 (b): “A description of the implementation of any projects or management actions, and the effect on groundwater conditions resulting from those projects or management actions." ▪ We could not find specific information in the Periodic Evaluation that consistently discusses and reports the quantified benefits of each project and management actions (PMAs). Table 3-1 and Table 3-2 of the Periodic Evaluation include the “benefits observed to date”, but many projects only have qualitative descriptions. For example, Section 3.1.1 discusses the new extraction allocation system that supports the implementation of the two management actions (Reduction in Groundwater Production and Water Market Pilot Program) identified in the Oxnard Plain Groundwater Sustainability Plan (GSP). However, the quantified benefits of these PMAs are not discussed in the relevant section or Table 3-1. Please confirm the Periodic Evaluation meets the guidance provided by the DWR.	The GSP evaluation complies with the SGMA regulations and is consistent with the guidance provided by DWR.
Oxnard	5	City of Oxnard	Per the Guidance: “A GSA should assess the projects and management actions outlined in the original GSP and explain whether those are still relevant and feasible, including estimates of cost and potential funding sources and whether permitting and CEQA requirements need to be met.” ▪ We could not find specific information that the Periodic Evaluation discusses the cost and potential funding sources and whether permitting and CEQA requirements need to be met for the PMAs. Please confirm the Periodic Evaluation meets the guidance provided by the DWR.	The GSP evaluation complies with the SGMA regulations and is consistent with the guidance provided by DWR.
Oxnard	5	City of Oxnard	Per the Guidance: “Additionally, for the various projects and management actions outlined in the GSP, the GSA should describe the process for public notice and engagement of interested parties.” ▪ We could not find specific information that the Periodic Evaluation discusses the process for public notice and engagement of interested parties for each PMA. Please confirm the Periodic Evaluation meets the guidance provided by the DWR.	The GSP evaluation complies with the SGMA regulations and is consistent with the guidance provided by DWR.
Oxnard	5	City of Oxnard	Per the Guidance: “For projects and management actions that are currently ongoing or have already been completed, the Periodic Evaluation should provide an evaluation and status update including realized benefits, expected benefits, and benefits and impacts to beneficial uses and users. The description should include how these projects and management actions are helping the basin achieve sustainability through the assessment of the groundwater conditions in relation to the measurable objectives for the relevant sustainability indicators. A description of the monitoring network and data related to projects and management actions that are showing progress toward sustainability, and documentation that the project is not impacting nearby beneficial users, should be included.”	The GSP evaluation complies with the SGMA regulations and is consistent with the guidance provided by DWR.

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			▪ Project 1 and Project 9 are ongoing. However, we could not find specific information in the Periodic Evaluation that discusses how these projects are helping the Basin achieve sustainability through the assessment of the groundwater conditions in relation to the measurable objectives for the relevant sustainability indicators. Additionally, we could not find specific information in the Periodic Evaluation that discusses the monitoring network and data related to these projects. Please confirm the Periodic Evaluation meets the guidance provided by the DWR.	
Oxnard	5	City of Oxnard	Per the Guidance: “Significant new information should be discussed. Such as whether a GSP project was considered no longer necessary and was dropped, ...” And “The GSA should describe the challenges or setbacks that have prevented or delayed implementation of projects and management actions” ▪ Project 3 Riverpark-Saticoy GRRP is inactive but the Periodic Evaluation did not discuss the reasons, challenges, or setbacks that have prevented or delayed implementation. Please confirm the Periodic Evaluation meets the guidance provided by the DWR ▪ Project 5 Voluntary Temporary Fallowing is not implemented but the Periodic Evaluation did not discuss the reasons, challenges, or setbacks that have prevented or delayed implementation. Please confirm the Periodic Evaluation meets the guidance provided by the DWR. ▪ In Table 3-1, one of the top management actions is reduction in groundwater extraction, which has not been implemented. The Periodic Evaluation did not discuss the reasons, challenges, or setbacks that have prevented or delayed implementation. We request that the Periodic Evaluation include more details about FCGMA’s desire to pursue ramp down and the potential timeline	The GSP evaluation complies with the SGMA regulations and is consistent with the guidance provided by DWR. FCGMA supports project development to limit the need for demand management
Oxnard	5	City of Oxnard	Per the Guidance: “For projects and management actions that have yet to begin or are still conceptual, assess the need for those based on the current conditions and expected outcomes of the existing projects and management actions. Describe the potential timeline to get those projects and management actions implemented or what may be needed to take them from the conceptual or as-needed phase to the “shovel ready” phase.” ▪ The Periodic Evaluation lists some PMAs that are in the preliminary design phase, such as Projects 2, 11, 12, 17, and 18, but the potential timeline for these PMAs could not be specifically found. Please confirm the Periodic Evaluation meets the guidance provided by the DWR.	The GSP evaluation meets the SGMA regulations and complies with the guidance provided by DWR. Specific project timelines will be developed by the project proponents as the projects progress.
Oxnard	5	City of Oxnard	2. It is not clear if the Periodic Evaluation fully complies with the Guidance or the GSP Regulations with respect to the description of GSP effectiveness. ▪ Per the Guidance: “The GSA should evaluate current groundwater conditions for each applicable sustainability indicator relative to sustainable management criteria established in the GSP (i.e., measurable objectives, interim milestones, minimum thresholds, and undesirable results) and describe, with supporting data, whether implementation of the GSP is effective.” ▪ Per the GSP Regulations § 356.4 (b): “A description of the implementation of any projects or management actions, and the effect on groundwater conditions resulting from those projects or management actions." ▪ The Periodic Evaluation notes that Minimum Threshold (MT) exceedances and Undesirable Results (URs) occurred during the evaluation period. However, groundwater elevations in all key wells rebounded to be above the 2025 Interim Milestones (IMs) by spring 2024. We could not find specific information that the Periodic Evaluation clearly assesses whether the progress is due to GSP implementation or simply due to the favorable climatic conditions in 2023 and 2024. For example, a more thorough assessment of the long-term trends in Basin performance (normalized for climatic variability) would provide a clearer picture of GSP implementation effectiveness so that Basin management can be proactive to avoid URs. Please confirm the PEriodic Evaluation meets the guidance provided by DWR.	The GSP evaluation complies with the SGMA regulations and is consistent with the guidance provided by DWR.
Oxnard	5	City of Oxnard	Per the Guidance, for each applicable sustainability indicator, consider: “Evaluate progress made (including challenges encountered, if applicable), describe any adaptive management approaches employed to address minimum threshold exceedances, whether GSP implementation is effective thus far, and any other pertinent information related to progress towards achieving sustainability.” And “Have basin	The GSP evaluation complies with the SGMA regulations and is consistent with the guidance provided by DWR.

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			conditions and GSP implementation affected beneficial uses and users? For example, were there any reported dry wells during the evaluationcycle?" ▪ URs occurred in spring 2015 and fall 2022 (Section 2.2.1.4), but the Periodic Evaluation only describes the adaptive management approaches in general terms, and the potential impact on beneficial uses and users due to MT exceedances or URs, such as any reported dry wells, is not discussed. Please confirm the Periodic Evaluation meets the guidance provided by the DWR.	
Oxnard	5	City of Oxnard	Per the Guidance, for each applicable sustainability indicator, consider: "are other sustainability indicators being impacted" ▪ We could not find specific information that the impact of each sustainability indicator on other sustainability indicators was discussed in the Periodic Evaluation. Please confirm the Periodic Evaluation meets the guidance provided by the DWR.	The GSP evaluation complies with the SGMA regulations and is consistent with the guidance provided by DWR. Groundwater levels are used as a proxy for other sustainability indicators. The linkages between the sustainability indicators are discussed in the GSP.
Oxnard	5	City of Oxnard	Per the Guidance on basin setting section, GSAs shall "describe whether changes to surface water supply reliability will affect water budget assumptions." ▪ Section 4.2.2 discussed water supplies during the evaluation period and compared them to historical and projected supplies in the GSP. However, we could not find specific information that the changes to surface water supply reliability and their effect on water budget assumptions were discussed. Please confirm the Periodic Evaluation meets the guidance provided by the DWR.	The GSP evaluation complies with the SGMA regulations and is consistent with the guidance provided by DWR.
Oxnard	5	City of Oxnard	3. It is not clear if the Periodic Evaluation fully addresses all of the DWR Corrective Actions.· DWR Recommended Corrective Action 4: Elaborate how the Agency is planning to verify that the groundwater level thresholds are adequate to assess the groundwater quality conditions in the Subbasin. Discuss how the groundwater quality data from the existing monitoring network willbe used for sustainable management of the Subbasin. Coordinate with the appropriate groundwater users, as identified in the GSP, and the appropriate water quality agencies in the Subbasin to evaluate how the Agency's current groundwater management strategy is affectingthe groundwater quality in the Subbasin. ▪ Section 2.2.4.1 of the Periodic Evaluation discusses how the GSAs verified that the groundwater levels are adequate to assess the groundwater quality conditions However, we could not find specific information that the Periodic Evaluation discusses "how the groundwater quality data from the existing monitoring network will be used for sustainable management of the [B]asin" and coordination with appropriate water quality agencies in the Basin. Please confirm the Periodic Evaluation meets the guidance provided by the DWR	The GSP evaluation complies with the SGMA regulations and is consistent with the guidance provided by DWR.
Oxnard	5	City of Oxnard	▪ The GSP stated that there are several sources of salinity in the basin, and the GMA could not determine which is actually causing any given detrimental chloride/salinity water quality impacts. The evaluation does not indicate whether the GMA has a better understanding of this key conceptual model issue. However, all of the PMAs, including EBB, seem to be based on the assumption that salinity impacts are primarily caused by modern-day seawater intrusion. We recommend that the evaluation should assess how sustainability indicators will be affected if this assumption on the source of salinity impacts is incorrect, even partially. Also, there should be an evaluation of the effect of PMAs like EBB on the other two sources of salinity. Further, the validity of the GMA's apparent assumption that modern-day seawater intrusion is the primary source of salinity in the basin may also affect the ongoing validity of the GSP's assumption that groundwater elevation is a good proxy for all other sustainability indicators	Noted. Thank you for your comment.
Oxnard	5	City of Oxnard	Per the DWR GSP Assessment Staff Report: "The GSP also states that the City of Oxnard's General Plan does not contain water supply assumptions, which would conflict with the sustainable management criteria or the projects and management actions proposed in OxnardGSP. However, the City of Oxnard submitted a comment to the Department claiming that the GSP's statement is inaccurate because there are fundamental inconsistencies between the City's 2030 General Plan and the GSP. The City further states that water demand in the City couldincrease by 50 percent due to population growth, so the GSP's management action to reduce groundwater pumping by 40 percent is inconsistent with the City's growth	FCGMA will continue to work with agencies and stakeholders in the basin to evaluate the impacts of SGMA implementation in the Subbasin. The periodic evaluation focuses on the progress toward sustainability achieved since the GSP was submitted.

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			assumptions, long-term strategy for groundwater management, water supply assumption, and the land use plan. Department staff encourage FCGMA to work with the City of Oxnard to rectify the difference in policies that could potentially impact SGMA implementation in the Subbasin." ▪ We could not find specific information that the Periodic Evaluation addresses DWR's comment regarding reconciling the inconsistency between the City of Oxnard's 2030 General Plan and the GSP. If it is not included already, the City requests that as part of a GSP update (see also Comment #4), the City's growth and water supply assumptions be accurately reflected.	
Oxnard	5	City of Oxnard	4. The Basin would benefit from a GSP Update. ▪ Per the GSP Regulations § 354.44 (a): "Each Plan shall include a description of the projects and management actions the Agency has determined will achieve the sustainability goal for the basin, including projects and management actions to respond to changing conditions in the basin." ▪ As FCGMA is aware, the City of Oxnard is completing the construction of a pilot Aquifer Storage and Recovery (ASR) Indirect Potable Reuse (IPR) project that is anticipated to yield as much as 2,800 acre-feet per year (AFY). Additionally, in the City's approved 5-year capital improvement program, there are several more ASR projects planned with funding identified, each with a theoretical yield of 2,800 AFY per well, for a total of 14,000 AFY. Despite prior requests, it is not clear that the IPR project has been explicitly incorporated into the GSP and the Basin groundwater flow model (Model). The City requests that as part of a future GSP update, the list of PMAs for the Basin be fully updated and reflected in both the GSP and the Model.	FCGMA remains committed to working with the City of Oxnard to include any projects that the City is undertaking in the Subbasin in the list of projects in the GSP evaluation. Additionally, once the City provides sufficient project information the projects can be included in future numerical model simulations for the Subbasin.
Oxnard	5	City of Oxnard	▪ For the Oxnard subbasin, Table ES-3 (page ES-4) includes a reference to significant progress on projects and programs to mitigate overdraft and seawater intrusion to include the expansion of recycled water. However, we could not find specific information to verify that the groundwater model scenarios include additional new water supply generated by implementation of both Phase I and Phase II of the City of Oxnard GREAT Program, which are expected to generate up to 14,000 AFY as noted above. Please clarify which recycled water projects are being referenced for progress towards mitigation of overdraft and seawater intrusion	1500 AFY of GREAT water was delivered to agricultural operators and PVCWD in all scenarios. The remaining Phase I and Phase II recycled water produced by the City of Oxnard GREAT Program is not included in the model scenarios in the Periodic Evaluation due to uncertainty in the planned use of that water. FCGMA met with the City of Oxnard during the development of the model scenarios to solicit the detailed information required to include these projects in the model runs. That information was not available at the time the model scenarios were developed for this Periodic Evaluation but will be included in subsequent model scenarios when the information is available.
Oxnard	5	City of Oxnard	▪ A seawater intrusion barrier project is referenced on Table 1-1 Page 4. There is also a reference to a Seawater Injection Barrier Feasibility Study (Project 11) on Page 49. Please provide clarification on who is the lead agency for this project and please provide copies of study and the, "Preliminary groundwater modeling" referenced that "suggests that … installation of 5 to 10 injection wells landward of the eastern edge of the existing seawater intrusion front, injecting a total of 2,400 AFY, has the potential to eliminate any further inland migration of seawater in the FCA". Please provide the model input used to generate the preliminary results.	The feasibility study does not have a lead agency at this time. This potential project is listed in the GSP evaluation so that interested parties and the FCGMA board are able to determine the need for additional development, and are able to seek funding if the project is determined to be a good candidate. FCGMA will provide the model input files.
Oxnard	5	City of Oxnard	▪ In order to encourage the development of PMAs in the Basin, a storage accounting framework or other mechanisms should be established to protect the investments that entities make in terms of creating new water supplies that improve Basin sustainability (e.g., developing IPR and other recharge and conjunctive use projects).	Noted. This is a good suggestion that can be evaluated and potentially incorporated into basin management in the upcoming years.
Oxnard	5	City of Oxnard	▪ Taken together, the extreme and unique recent climatic conditions resulting in substantially larger diversions from the Santa Clara River and significant likely reliance on EBB for seawater intrusion mitigation are complex enough to warrant a GSP update. The evaluation is reliant on the 2021 technical memoranda (United Water Conservation District 2021a). The City is aware United has been working very hard to develop more current and robust analysis, which may affect the assessment of PMAs and other critical aspects of the evaluation.	Noted. FCGMA will continue to work with agencies and stakeholders in the basin to evaluate the need to change the sustainable management criteria in response to an updated understanding of the impacts of projects and management actions. At this time, in response to stakeholder feedback, the Oxnard Subbasin will continue to be evaluated using the sustainable management criteria established in the GSP.
Oxnard	5	City of Oxnard	Per the GSP Regulations § 354.8 (f): "A plain language description of the land use elements or topic categories of applicable general plans that includes the following: (2) A general description of how implementation of existing land use plans may change water demands within the basin or affect the ability of the Agency to achieve sustainable groundwater management over the planning and implementation	FCGMA will continue to work with agencies and stakeholders in the basin to evaluate the impacts of SGMA implementation in the Subbasin. The periodic evaluation focuses on the progress toward sustainability achieved since the GSP was submitted.

Basin	Letter Number	Commentor	Comment	Response
			horizon, and how the Plan addresses those potential effects.(3) A general description of how implementation of the Plan may affect the water supply assumptions of relevant land use plans over the planning and implementation horizon.”· Per the GSP Regulations § 354.18 (3)(B): “Projected water demand shall utilize the most recent land use, evapotranspiration, and crop coefficient information as the baseline condition for estimating future water demand. The projected water demand information shall also be applied as the baseline condition used to evaluate future scenarios of water demand uncertainty associated with projected changes in local land use planning, population growth, and climate.” ▪ Per Comment #3, above, the City requests that the City’s growth and water supply assumptions be accurately reflected in a GSP update, if not already accounted for in the Periodic Evaluation.	
Oxnard	5	City of Oxnard	5. The assessment of boundary flows and the impacts to Basin sustainability need to be further assessed.· Per the Guidance: “A list of potential additional information is provided below:o Describe relevant interbasin coordination efforts.”o Discuss how the proposed management of the Basin (including minimumthresholds and measurable objectives) aligns with the management of adjacent basins.o Describe potential impacts from adjacent basins and/or to adjacent basins due to Plan implementationo Assess whether Plan implementation is affecting the ability of an adjacent basin to achieve its sustainability goal.”· Per the GSP Regulations § 355.4 (b)(7): “Whether the Plan will adversely affect the ability of an adjacent basin to implement its Plan or impede achievement of its sustainability goal.” ▪ Inflows to the Basin from the adjacent Pleasant Valley Basin and the Los Posas Basin are an important component of the Basin water budget. Updated boundary flow values are included in Table 5-2 and Section 5.2.2 of the Periodic Evaluation.However, the City is concerned about how those flows may be impacted in the future and desires that a future GSP update include a discussion and additional certainty as to how these flows will be maintained in the future, as well as an assessment as to whether Sustainable Groundwater Management Act (SGMA) implementation or the adjudication in the Pleasant Valley Basin will impact the Basin’s ability to achieve sustainability.	FCGMA remains committed to evaluating the impacts of future projects and management actions in the Oxnard Subbasin and Pleasant Valley Basin. Additional modeling has been proposed by multiple stakeholders. FCGMA is compiling the list of suggested model updates and investigations to be performed in the upcoming years.
Oxnard	6	OPV Coalition	Recommendation #1: Given that historical peer reviews conducted on the models were completed at the discretion of United and FCGMA, and that those reviews did not assess recent revisions to the models, I recommend, in the interest of transparency, quality assurance, and diversity of opinion that either an arms-length independent review strategy be implemented or, preferably, that FCGMA and United agree to disclose the model(s) for review by the basin’s stakeholders consistent with numerous previous requests.	UWCD provided extensive model documentation for the version of the model used for the GSP. UWCD is currently working on the supplemental documentation to cover the changes made since the GSP. As of the time this comment response matrix was prepared, UWCD has not yet finalized this supplemental documentation.
Oxnard	6	OPV Coalition	I offer below several additional specific comments and recommendations on the Evaluations that in my opinion are necessary to build trust in the Evaluations, the modeling that was relied upon in those evaluations, and the GSP process as a whole.	Noted. Thank you for your comment.
Oxnard	6	OPV Coalition	Recommendation 2: The Evaluations should clearly distinguish observed data from model outputs.Explanation: It is important to distinguish measured data from model outputs: model outputs are not data. The Evaluations conflate interpretations based on monitoring data with outputs from groundwater models, as illustrated by these example statements from the Executive Summary of the Oxnard Evaluation: “While groundwater elevations are higher than they were in 2015, available groundwater quality and numerical modeling data indicate that the Subbasin experienced additional seawater intrusion over the evaluation period” and “As anticipated in the GSP, numerical modeling data suggests that since 2015, approximately 140,000 acre-feet of groundwater was added to the Subbasin, and 113,600 acre-feet of seawater has intruded into the Subbasin.” Absent substantial changes such as achieved through re-calibration, model outputs will continue to show outputs analogous to those obtained previously (e.g., during preparation of the GSP), and this does not verify previous modeling or provide greater confidence in any conclusions. For the Evaluations, it is more important to determine (a) what the mapped salinity data indicate, (b) how measured data compare with previous model outputs and projections, and (c) whether differences in this comparison are substantial enough to warrant model revisions including structural changes or re-calibration	Agreed. The language in the executive summary has been revised.
Oxnard	6	OPV Coalition	Recommendation 3: The Evaluations should state the reasons and technical bases for proposed revisions to Measurable Objectives and Minimum Thresholds. Explanation: Changes are proposed to the	Noted. The details of the approach are discussed in the GSP, which is referenced in the evaluation.

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			Measurable Objectives and Minimum Thresholds, but the reasons and technical basis are not given. For example from the Oxnard Evaluation Section 2.2.1.8: “Based on the updated simulations, revisions are recommended to 9 minimum threshold groundwater elevations established in the GSP (Table 2-2, Minimum Threshold and Measurable Objective Groundwater Elevations for the Oxnard Subbasin). Eight of the recommended revisions are for wells located within the Saline Intrusion and Oxnard Pumping Depression management areas” and “Future scenario modeling was updated as part of this Periodic GSP evaluation. Two simulations were identified that minimize seawater intrusion and maximize total groundwater production from the Subbasin, PVB, and West Las Posas Management Area (WLPMA)… The simulated groundwater elevations from the NNP 3 scenario were used to develop recommended revisions to SMCs for the Subbasin.” Current Measurable Objectives and Minimum Thresholds were based on groundwater modeling, and the proposed changes appear to be based on a newly modeled scenario. The groundwater model is clearly playing a central role for FCGMA in determining these criteria, but it is unclear how it is being used to develop qualitative and quantitative recommendations. Thus, much greater explanation is necessary so that proposed changes can be understood and evaluated	
Oxnard	6	OPV Coalition	Recommendation 4: Given the growing body of monitoring data, the Evaluations should provide updates on the relationship between water levels and SGMA sustainability indicators and explain whether and when FCGMA and Dudek anticipate using direct measurements of these indicators in place of water levels.Explanation: At the present time, FCGMA uses water levels as a surrogate for the SGMA sustainability indicators. However, the body of monitoring data is growing and is incorporating more direct measurements of sustainability criteria. For example, the Oxnard Evaluation presents data and information regarding changes in chloride concentrations pertaining to seawater intrusion, which is a sustainability indicator under SGMA. Withregard to subsidence, which is also a SGMA sustainability indicator, the Oxnard Evaluation also states that (Table 1-1. Summary of New Information Since GSP) “DWR InSAR data are now available to examine land subsidence in the Oxnard Subbasin.” The Pleasant Valley Evaluation states similarly (again, in Table 1-1. Summary of New Information Since GSP). The Evaluations should discuss what was learned over the monitoring period regarding the reliability of water levels as a surrogate for SGMA sustainability indicators, including whether correlations that were previously developed between changes in water levels and SGMA sustainability indicators have been validated or will be updated, and whether and when FCGMA anticipates ultimately replacing the water level surrogate with the direct measurements.	While additional data have been gathered, the records are not yet long enough to establish the relationships described in the recommendation. SGMA allows for the use of groundwater elevations as proxies for all other sustainability indicators. FCGMA will continue to use groundwater elevations as a proxy for other sustainability indicators until a review of data collected by the monitoring network indicates that sufficient data are collected at the basin scale to use instead of groundwater elevation data.
Oxnard	6	OPV Coalition	Recommendation 5: Monitoring data relied upon in the Evaluations should be made publicly available.Explanation: In the Evaluations, model outputs and monitoring data are used to interpret progress toward sustainable management and recommend changes to Measurable Objectives and Minimum Thresholds. However, it is unclear what specific role monitoring data played in these decisions, since changes evident in some monitoring data – such as increases in chloride concentrations – are only available to stakeholders occasionally and in an incomplete fashion via reports and workshops. The Evaluations would facilitate better communication, understanding, and transparency by making monitoring data available in a format enabling stakeholders and the public to access, view, and interpret them. For example, the relationship between water levels and salinity (chloride) and the role of very wet or dry conditions on these relationships can be depicted and evaluated using mixed line-and-bar type charts. Such plots are available, for example, via the HiCharts charting library which enables sharing of data and plots over the web (www.highcharts.com). An example is provided below: the data in this example plot are unrelated to either the Oxnard Evaluation or the Pleasant Valley Evaluation, but similar plots could easily be made using the data that presumably supported both Evaluations. Once developed, updating of these plots with newly acquired data is a trivial task.	The monitoring data are publicly available from FCGMA on request.
Oxnard	6	OPV Coalition	Recommendation 6: The Evaluations should clarify the number of “key wells” and whether those are uniquely screened within individual aquifer units or span multiple aquifer units. Explanation: The Oxnard Evaluation provides contradictory statements regarding the number, and screened aquifer unit, of key wells. For example, its Executive Summary states “The GSP established minimum threshold and measurable objective groundwater elevations at 34 representative monitoring points, or “key wells” in the Subbasin.” Section 2.2.1.4 states (a) “In any single monitoring event, water levels in 6 of the 14 key wells	The text has been revised to reflect that there are 15 key wells in the UAS. The tables provide a list of the key wells and the aquifers in which they are screened. Additionally, Table 2-1 has been updated to include additional footnotes that specify the appropriate aquifer systems for wells screened in "multiple aquifers".

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			are below their respective minimum threshold7" and refers to footer #7 which states "15 wells were referenced in the GSP. However, only 14 key wells are screened in the UAS." and (b) "During the evaluation period, groundwater elevations occurred below the historical low groundwater elevations at 9 of the 15 key wells screened in the UAS and 11 of the 19 key wells screened in the LAS." Section 2.2.1.4 thus refers to 14 key wells in the UAS, with reference to footer 7, but later refers to 15 key wells; whereas the Executive Summary and other locations in the Oxnard Evaluation refer to 19 key wells in the LAS and 34 key wells in total from which a count of 15 key wells is obtained for the UAS contradicting footer #7. Both the Oxnard Evaluation and the Pleasant Valley Evaluation should clarify the number of "key wells" and whether those are uniquely screened within individual aquifer units or span multiple aquifer units	
Oxnard	6	OPV Coalition	Recommendation 7: The Evaluations should clearly recognize apparent progress toward sustainable conditions achieved through pumping curtailment and other basin management actions and distinguish this clearly from apparent progress achieved through favorable changes in climatic conditions.Explanation: The Oxnard Evaluation contains positive statements regarding progress. For example, the Executive Summary states "Under average climate conditions, the interim milestones targeted groundwater elevation recoveries that averaged approximately 14 feet in the UAS and approximately 22 feet in the LAS over the first five years of GSP implementation. The groundwater elevations measured in spring 2024 ranged fromapproximately 5 to 117 feet higher than those in spring 2015. Importantly, groundwater elevations in spring 2024 were higher than the minimum thresholds in 21 of the 27 key based upon the available data. FCGMA anticipates that the general trend of rising groundwater elevations will continue through 2040 with continued implementation of the GSP." Likewise Section 2.2.1.5 states "The introduction of new recycled water supplies, reduction in groundwater pumping, and historically high recharge have reversed the downward trend in groundwater elevations in the Subbasin." Similar statements are made in the Pleasant Valley Evaluation. Increased water levels and other indicators are indeed positive, however, the vast majority of this apparent progress likely results from very wet recent conditions, with the introduction of new recycled water supplies and reductions in groundwater pumping only minor contributors. An effort should be made to determine to what extent these projects contributed to the changed conditions versus the historically high recharge.	Text has been revised to clarify the importance of the wet water years on groundwater elevation recoveries.
Oxnard	6	OPV Coalition	Recommendation 8: The Evaluations should clarify and expand upon the proposed use of transducer/dataloggers.Explanation: As noted in the Oxnard Evaluation Section 2.2.1 "Water year groundwater elevations are characterized using seasonal low and seasonal high measurements. Seasonal low groundwater elevations are defined in the GSP as groundwater elevations measured between October 2 and October 29 and seasonal high groundwater elevations are defined in the GSP as groundwater elevations measured between March 2 and March 29." The Oxnard Evaluation proposes installation of transducer/dataloggers (Section 3.2.7 Project No. 12: Installation of Transducers in Groundwater Monitoring Wells). The Pleasant Valley Evaluation also proposes installation of transducer/dataloggers (Section 3.2.10 Project No. 11: Installation of Transducers in Groundwater Monitoring Wells). The installation of transducers/dataloggers is an important improvement to the monitoring program to mitigate data gaps. However, it is unclear whether the transducer/dataloggers will (a) be installed only for two weeks at each (spring/fall) event or will (b) remain in place for a much longer time and a two-week data window retrieved for this specific use. Installation of transducer/dataloggers for the March and October events would improve the comparability of data retrieved at individual synoptic events but offer limited additional value whereas leaving the instruments in-place for an extended time would enable the actual timing of seasonal low and high values each year to be determined (which are weather dependent and may not fall in these months) enabling comparability between synoptic events as well as within them, and improving understanding of the aquifer response to changes in recharge, pumping, and projects.	The intent of the transducer installations is to gather data year round, from which data can be retrieved periodically. The text has been revised to clarify the intent. Importantly, transducer data will help assure that measurements represent static groundwater levels and to collect measurements across the basin over a short period of time consistent with DWR guidance.
Oxnard	6	OPV Coalition	Recommendation 9: The Evaluations should be consistent in their analysis and comparison of actual and potential projects and their value for water resources management. Explanation: Note c to Table ES-3 of the Oxnard Evaluation states that it "Excludes the 10,000 AFY of simulated brackish water extractions from the Subbasin via United Water Conservation District's Extraction Barrier and Brackish Water Treatment project extraction wells." Where is this extraction accounted for?	The estimated increase in the sustainable yield of the PVB that results from implementing the EBB project is the increased pumping that can occur in the PVB as a result of the brackish water extraction barrier pumping at the coast. EBB project water is separate from the sustainable yield of the Oxnard and Pleasant Valley Basins because: (1) this water requires treatment prior to serving

Basin	Letter Number	Commentor	Comment	Response
			Given that the extracted water is brackish, and likely to increase in salinity over time, there should be an accounting of this withdrawal possibly with a fresh-saline apportionment when weighing the relative value of this potential project to the sustainability of the basins' water resources	- therefore if individuals pumped this much from the basin, undesirable results would occur and (2) 50% is used as a new water supply for the Oxnard Subbasin.
Oxnard	6	OPV Coalition	Recommendation 10: The Evaluations should state whether cross-aquifer flows and migration of salts have been considered in the conceptual site model (CSM) and in groundwater modeling.Explanation: Section 3.2.5 of the Oxnard Evaluation (Project No. 10: Destruction of Abandoned Wells), states that abandoned and potentially cross-connecting wells will be properly destroyed. This is an important activity to reduce the potential for migration of poor-quality water between aquifers. Such cross-connections can sometimes be a significant component of the water budget: the Evaluations should clearly state whether the locations and rates of historical cross-connection have been considered in the Basins' CSM and whether the model simulations and water budgets considered these flows and the migration of salts.	Presently, not enough is known about these wells to include cross connection rates in the water budgets and model simulations.
Oxnard	6	OPV Coalition	Recommendation 11: The Evaluations should state whether additional modeling was performed following the May 30, 2024 Technical Discussion Workshops. Explanation: There are differences in the scenario results presented in the May workshops and those presented in the August Evaluations including for example the tabulated budgets for the NNP1,2,3 scenarios presented in the Oxnard Evaluation. Similar differences appear when comparing the workshop presentation materials with the August Pleasant Valley Evaluation as well. Please explain if additional modeling was conducted after the May workshop results were presented, or if there is another cause for these differences.	The text states in section 9.1: "Comments made during the technical workshop were used to refine the model scenarios proposed and to develop an additional modeling scenario to evaluate impacts of a geographic redistribution groundwater production on seawater intrusion in the Oxnard Subbasin." A sentence was added to clarify that the results of the refined model scenarios are presented in the periodic evaluation. These refinements were made in June 2024. An issue with the representation of recycled water distribution in the PVB was identified in September 2024. A discussion of this issue was added to section 5.2, and the issue is currently being corrected.
Oxnard	6	OPV Coalition	Recommendation 12: The Evaluations should state when model documentation will be made available.Explanation: Section 5.1.3 of the Oxnard Evaluation (Model Extension and Recalibration) states that "As part of this periodic evaluation, UWCD extended the Coastal Plain Model to simulate groundwater conditions in the Subbasin through the end of water year 2022 (i.e., September 30, 2022). During the model update and extension process, UWCD recalibrated the Coastal Plain Model. This recalibration effort involved incremental adjustments to local hydraulic conductivity, storativity, and boundary conductance values which resulted in better simulation of groundwater conditions along the coastline (details to be included in UWCD's Coastal Plain Model update technical memorandum)." A similar statement is made in the Pleasant Valley Evaluation (again, in Section 5.1.3 Model Extension and Re-Calibration). When will the Coastal Plain Model Technical Memorandum (TM) be made available? To complete a thorough review of the conclusions and recommendations presented in the Evaluations, and to dispel any concerns regarding the reliability of the modeling, it is essential to have access to this TM detailing updates to the groundwater model(s) that underpinned these basins' Evaluations.	UWCD provided extensive model documentation for the version of the model used for the GSP. UWCD is currently working on the supplemental documentation to cover the changes made since the GSP. As of the time this comment response matrix was prepared, UWCD has not yet finalized this supplemental documentation.

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From:	FCGMA
To:	Christopher Anacker; FCGMA
Subject:	RE: 5-Year GSP Workshop -- input re: potential earthquake activity ...
Date:	Monday, September 9, 2024 11:28:08 AM
Attachments:	~WRD0002.jpg image001.png image003.png

Hello Christopher,

Thank you for submitting written comment regarding the 5-Year GSP Evaluation draft documents. We have filed your response for review and consideration.

We'll be sorry to miss you at the workshops, but we greatly appreciate your engagement via email.

Regards,

Fox Canyon Groundwater Management Agency
800 S. Victoria Ave. #1600
Ventura, CA 93009
(805) 654-2014 | fcgma@ventura.org
www.FCGMA.org

From: Christopher Anacker <christopher.anacker@gmail.com>
Sent: Sunday, September 8, 2024 1:58 PM
To: FCGMA <PWA.FCGMA@ventura.org>
Cc: christopher.anacker@gmail.com
Subject: 5-Year GSP Workshop -- input re: potential earthquake activity ...

Hello,

Thanks for accepting my input.

Although I won't be able to attend the workshops, I do wonder whether the planning includes or can include overall earthquake resilience of the water system by creating a set of operations or procedures to be implemented post-earthquake in the area, should it ever occur.

I guess the concerns can be categorized as:

Infrastructure Vulnerability, since Earthquakes can significantly impact water infrastructure, such as:

- Damage to wells, pipelines, and treatment facilities
- Disruption of power supply needed for pumping and treatment
- Potential contamination of groundwater sources due to damaged infrastructure

Water Supply Resilience and how earthquake activity might affect:

- Groundwater availability and quality post-earthquake
- The ability to extract and distribute water in emergency situations
- Potential changes in aquifer properties or groundwater flow patterns

Subsidence and Liquefaction, looking at Earthquake-induced ground movements that can exacerbate issues related to:

- Land subsidence, which may already be a concern due to groundwater extraction
- Soil liquefaction, particularly in areas with high groundwater tables

Interconnected Surface Water as seismic activity could potentially alter:

- The relationship between groundwater and surface water bodies
- Streamflow patterns and groundwater recharge rates

Long-term Sustainability that incorporates earthquake considerations to ensure:

- The resilience of water supply systems in the face of natural disasters
- The ability to maintain sustainable groundwater management practices even after seismic events

Monitoring and Data Collection that include provisions for:

- Monitoring wells and other data collection systems that can withstand seismic activity
- Rapid assessment of groundwater conditions following an earthquake

Hope this input helps.

Thanks for your efforts,
Chris

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FARM BUREAU OF VENTURA COUNTY
THE INDEPENDENT VOICE FOR AGRICULTURE

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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 at 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,

Maureen McGuire
Chief Executive Officer
Farm Bureau of Ventura County

October 7, 2024

Dr. Farai Kaseke, Asst. Groundwater Manager
Fox Canyon Groundwater Management Agency
L#1610, Ventura, CA 93009

Subject: Comments on Oxnard Subbasin, Pleasant Valley Basin, and Las Posas Valley Basin 5-Year GSP Evaluation Draft Documents dated August 2024

Dear Dr. Kaseke:

United Water Conservation District (United) appreciates the opportunity to review the August 2024 drafts of Fox Canyon Groundwater Management Agency's (FCGMA) *First Periodic Evaluations* of the Groundwater Sustainability Plans (GSPs) for the Oxnard Subbasin, Pleasant Valley (PV) Basin, and Las Posas Valley (LPV) Basin (the *5-Year GSP Evaluation Draft Documents*), prepared by your consultant, Dudek, and released for public review and comment on September 6, 2024. United appreciated the opportunity to significantly contribute to development of these evaluations through the groundwater flow modeling we conducted for the FCGMA, and appreciated the helpful, cooperative engagement with your staff and Drs. Jones and Weinberger of Dudek during that effort. And finally we are impressed with the content and quality of the documents, as well as the presentations given by FCGMA and Dudek staff at the related workshops hosted by FCGMA. In the spirit of cooperation and collaboration, United staff respectfully submit the following comments and questions on the 5-Year GSP Evaluation Draft Documents with the hope that the FCGMA and Dudek will find them helpful in producing the highest-quality final documents possible.

General Comment for Oxnard and Pleasant Valley Basin Documents:

1. Because of the efforts made by United, Pleasant Valley County Water District (PVCWD), Camrosa Water District, the Cities of Oxnard, Camarillo, and Ventura, and FCGMA to aggressively design and implement new water supply sources since release of the original GSPs in 2020, sustainable yields of the Oxnard and PV (OPV) basins have improved significantly, as noted in the 5-Year GSP Evaluations. Additionally, the recent two years of high rainfall (wet years) certainly helped groundwater elevations move upward toward the measurable objectives (MOs) and minimum thresholds (MTs) established in the GSPs, as did reductions in pumping in the basins.

   Furthermore, the 5-Year GSP Evaluations showed that there is one (and only one) path forward—the "Future Baseline with EBB" scenario—that can achieve sustainability in the OPV basins, halt and reverse seawater intrusion in the southern Oxnard basin, while avoiding a rampdown of pumping that would likely cause significant harm to the people, businesses, and other stakeholders in Ventura County. The projects included in this scenario also will bring improvements to the reliability (resilience) of local supplies, groundwater quality, and our ability to adapt to potential climate-change impacts in the coming years.

We encourage the FCGMA to emphasize in its statements and documents that groundwater conditions in the OPV basins are improving substantially thanks to the efforts of several agencies, and to support the one future scenario—"Future Baseline with EBB"—that is demonstrated to achieve groundwater sustainability without requiring a harmful rampdown in groundwater supply.

Specific Comments on 5-Year GSP Evaluation Draft Document for Oxnard Subbasin:

2. Page ES-2, second paragraph: For clarity, we suggest adding "for United's conjunctive use and groundwater recharge operations" at the end of the existing sentence that reads "The wetter than average 2023 and 2024 water years resulted in increased availability of Santa Clara River surface water diversions."
3. Page ES-2, third paragraph: The last sentence of this paragraph includes the statement "As anticipated in the GSP, numerical modeling data suggests that since 2015, approximately 140,000 acre-feet of groundwater was added to the Subbasin..." It would be helpful to include an ending year in the statement (e.g., "from 2015 through 2022" or whatever year is appropriate), because significantly more than 140,000 acre-feet of groundwater was recharged to the Oxnard subbasin since 2015 if the most recent two years (2023 and 2024) are included.
4. Page ES-3, second paragraph: The first sentence of this paragraph states "Since adoption of the GSP, agencies in the Subbasin, with support from FCGMA, have begun delivering recycled water for agricultural irrigation." United's understanding is that recycled water has been delivered by Oxnard for agricultural irrigation since 2016, three years prior to the 2019 adoption of the GSP for Oxnard subbasin.
5. Page ES-3, last paragraph: This paragraph summarizes changes in sustainable yield and overdraft. We suggest adding a sentence at the end of this paragraph along the lines of "This is an improvement from the state of overdraft as of 2020, due largely to…" and then explain why current estimates of overdraft are significantly smaller than estimated overdraft as of 2019.
6. Table 1-1: Under the "Future Projects" section of this table, "Purchase of Supplemental State Water Project (SWP) Water" is listed. United has been purchasing supplemental SWP water since 2017; therefore, we recommend moving this project up to the "Projects that are currently being implemented" section of Table 1-1.
7. Page 22, last paragraph: To be more precise, we suggest changing the first sentence of this paragraph to "UWCD's updated interpretation indicates that the saline water impact front migrated landward from 2015 to 2020." United's interpretation did not include evaluation of migration of the seawater intrusion front after 2020.
8. Page 25, last paragraph: In the second sentence of this paragraph, it would be helpful to specify whether the listed nitrate concentrations are as nitrogen, or as nitrate. Both

reporting bases are commonly used in water quality analysis, but the significance of the results can be quite different depending on which reporting basis is used

9. Page 38, first paragraph of Section 3.1.2.4.1: We recommend adding "to be used in lieu of groundwater pumping" at the end of the first sentence, to inform the reader of the value of surface-water deliveries in improving groundwater conditions.

10. Table 3-2: For Project 7, the Laguna Road Recycled Water Pipeline Interconnection, United is now forecasting completion of Phase 1 in early 2025, rather than 2024. This is new information from United, not a mistake in the document.

11. Page 45: In Section 3.2.2.2, under "Expected Benefits," line 4, we recommend removing the word "additional." The PTP system has not previously received recycled water.

12. Page 46, Section 3.2.3.1: United has updated information regarding the EBB project, as follows. United's current description of EBB design and construction phasing includes the monitoring well construction as part of the design phase. Phase 1 is considered the construction of the initial extraction well field and discharge facilities. Approximately seven (7) wells will be constructed in the Phase 1 extraction well field. The field will be operated to produce and average of approximately 3,500 AFY in total. Design production from each individual well will be based on conditions observed during drilling. The second phase of EBB consists of design and construction of the treatment plant, conveyance system to distribute treated water, a connection to the Calleagus Salinity Management Pipeline, and expansion of the extraction wellfield to accommodate approximately 10,000 AFY of extraction. Currently, United anticipates thirteen (13) additional wells will be required.

13. Page 47, first paragraph of Section 3.2.4.2: Consider modifying the second sentence of this paragraph to the following, which more accurately reflects United's purchases of supplemental SWP water since 2019: "Between 2019 and 2023, UWCD purchased an additional 29,329 AF of supplemental State Water (transfers, exchanges and Article 21 water). This water was released from Lake Piru and Castaic Lake for recharge in the Santa Clara River Valley basins (Piru, Fillmore and Santa Paula) and for recharge and delivery in the Oxnard Subbasin and PVB.

14. Pages 53 and 54: Both "Project No. 16" and "Project No. 17" refer to formation of seawater intrusion barriers as a result of injection of recycled water along the coast. Please provide information regarding whether these projects are distinct from each other, and whether their impacts would be additive, complementary, or alternatives that would not operate simultaneously.

15. Page 55: Who would conduct the feasibility study envisioned in "Project No. 18?" When is it anticipated to be completed, and at what cost? The discussion presented in the Draft Document states "If the project is found to be feasible and is constructed, it will increase sustainable yield in the Subbasin, and thus have a positive impact on beneficial uses and users. Project impacts are intended to increase sustainable yield for all users." It seems more consistent to consider both benefits and impacts of a paper study neutral. Actual pumping optimization may have benefits for the basin, e.g., increasing sustainable yield, but significant impact to stakeholders in areas of the basin where pumping would be curtailed.

16. Page 70, second paragraph of the "Comparison to Historical Groundwater Supplies" section: For context, it would be helpful to remind the reader that the 2016 through 2022

period was dominated by drought, and very little surface water from the Santa Clara River was available for conjunctive-use deliveries to agriculture in the Oxnard subbasin. This explains the increased groundwater extractions from the UAS relative to the 1985-2015 average period.

17. Page 77, second sentence of Section 5.1.3: Suggest modifying the text to the following to more accurately describe the model extension and recalibration: "This recalibration effort involved incremental adjustments to local hydraulic conductivity and general head boundary conditions (GHB), which resulted in better simulation of groundwater conditions along the coastline (details to be included in UWCD's Coastal Plain Model update technical memorandum)."

18. Table 5-1: We have a question and suggestions as follows:
    - The first line indicates 50,000 AFY of projected future water supply/in lieu delivery for managed aquifer recharge (MAR) by United. However, the baseline 2070 model output indicated 60,300 AFY of MAR. Why does this 10,300 AFY difference exist?
    - It looks like notes "b" and "c" should become "d" and "e."
    - Notes "b" and "c" need to be updated/included to properly note AWPF. Currently "b" and "c" refer to Camarillo Desalter.

19. Page 95: In Section 5.2.3, under "Sustainable Yield with UWCD's EBB Water Treatment Project," the following statement is made: "…the simulation with the highest overall production rate was used as the estimate of sustainable yield of the Subbasin if UWCD's EBB Water Treatment project is successfully implemented as described in Section 5.2.2.6, Extraction Barrier and Brackish Water Treatment Scenario." It would be helpful to add a sentence clarifying that the sustainable yield of the basin under this scenario is likely higher than indicated, but was limited to the maximum assumed pumping rate.

<u>Specific Comments on 5-Year GSP Evaluation Draft Document for Pleasant Valley Basin:</u>

20. Page ES-3, Table ES-2: Shouldn't the "Current Average (2016-2022) subtotal for groundwater be 14,470 AFY, rather than 15,000 AFY?

21. Page ES-4, third bullet under "Future Groundwater Conditions:" Suggest adding "in the PVB" following "delivery for use…"

22. Page 39, first paragraph, suggest replacing “complimentary” with “complementary.”

23. Page 73, second sentence of Section 5.1.3: Suggest modifying the text to the following to more accurately describe the model extension and recalibration: “This recalibration effort involved incremental adjustments to local hydraulic conductivity and general head boundary conditions (GHB), which resulted in better simulation of groundwater conditions along the coastline (details to be included in UWCD’s Coastal Plain Model update technical memorandum).”

Sincerely,

John Lindquist
Water Resources Supervisor

cc: Mauricio Guardado (United)
Dr. Maryam Bral (United)
Dr. Bram Sercu (United)
Chris Coppinger (United)
Dr. Zachary Hanson (United)
Tracy Oehler (United)

From:	Lousen, Kendall P CIV USN NAVB VCTY PT MUGU CA (USA)
To:	FCGMA
Subject:	RE: Naval Base Ventura County (NBVC) Comments on FCGMA"s Oxnard Subbasin GSP Public Draft 5-Year Periodic Evaluation Review
Date:	Monday, October 7, 2024 4:57:32 PM
Attachments:	image001.png image004.png image002.png NBVC letter with comments Oxnard Basin GSP Draft Periodic Evaluation_7Oct2024.pdf

Thanks for letting me know, attached please find NBVC's letter and comments spreadsheet (5-page pdf) on FCGMA's Oxnard Subbasin GSP Public Draft 5-Year Periodic Evaluation.

V/r,

Kendall P. Lousen (He / Him)
Installation Community Planning Liaison Officer
Naval Base Ventura County
☎ Work Cellphone: (805) 294 – 9360

From: FCGMA <PWA.FCGMA@ventura.org>
Sent: Monday, October 7, 2024 4:30 PM
To: Lousen, Kendall P CIV USN NAVB VCTY PT MUGU CA (USA) <kendall.p.lousen.civ@us.navy.mil>; FCGMA <PWA.FCGMA@ventura.org>
Subject: [Non-DoD Source] RE: Naval Base Ventura County (NBVC) Comments on FCGMA's Oxnard Subbasin GSP Public Draft 5-Year Periodic Evaluation Review

Hello Kendall,

Thank you for sending the attached correspondence to FCGMA for review and consideration regarding the 5-Year GSP Evaluation Draft Documents for the Oxnard Subbasin.

The letter attached to your email message (both are attached for reference) referenced additional comments, but no other information was included in your message. Did you mean to send additional feedback in addition to the letter?

Please let us know at your earliest convenience by responding to this message.

Regards,

Fox Canyon Groundwater Management Agency
800 S. Victoria Ave. #1600
Ventura, CA 93009
(805) 654-2014 | fcgma@ventura.org
www.FCGMA.org

From: Lousen, Kendall P CIV USN NAVB VCTY PT MUGU CA (USA) <kendall.p.lousen.civ@us.navy.mil>
Sent: Monday, October 7, 2024 2:37 PM
To: FCGMA <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
☎ Direct: (805) 989 - 0333
Email: kendall.p.lousen.civ@us.navy.mil

NVBC

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.

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			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. 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. 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.
3	5.2.1			FCGMA should expand climate modeling to account for natural disasters and extreme weather evets (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			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. 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.
5	6.0			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. 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.
6	7.0; 7.2.3			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.

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
				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. 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.
7	7.4			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. 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. 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.

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			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. 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. 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.
9	9.1			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.

From:	Anselm, Arne
To:	FCGMA
Subject:	FW: Comments for GSP Periodic Evaluation
Date:	Monday, October 7, 2024 4:48:06 PM
Attachments:	FCGMA GSP Periodic Evaluation Response_Oxnard.pdf

From: Wolfe, Michael <michael.wolfe@oxnard.org>
Sent: Monday, October 7, 2024 4:36 PM
To: Anselm, Arne <Arne.Anselm@ventura.org>
Cc: Timothy Beaman <timothy.beaman@oxnard.org>
Subject: Comments for GSP Periodic Evaluation

Hello Arne,

Please see the attached letter from the City of Oxnard.

Michael

--
Michael L. Wolfe, P.E. - **Director of Public Works**
Public Works Department
305 West Third Street, East Wing, Third Floor
Oxnard, California 93030
www.oxnard.org

Public Works Department

305 West Third Street, East Wing, Third Floor
Oxnard, California 93030
Tel 805.385.8280

October 7, 2024

Arne Anselm, Interim Executive Officer
Fox Canyon Groundwater Management Agency
800 S. Victoria Ave. / #1610
Ventura, CA 93009

Subject: Fox Canyon Groundwater Management Agency (FCGMA) First Periodic Evaluation Groundwater Sustainability Plans (GSP) for the Oxnard Subbasin and Pleasant Valley Basin

Dear Mr. Anselm,

The City of Oxnard appreciates the opportunity to submit comments on the first periodic evaluation of the groundwater sustainability plans for the Oxnard subbasin and Pleasant Valley basin. Based upon information gathered from some of the outreach meetings attended by Oxnard staff, and after reviewing the available documents, the City has the following comments for your consideration.

1. It is not clear if the Periodic Evaluation of Groundwater Sustainability Plan (Periodic Evaluation) for the Oxnard Subbasin (Basin) complies with the California Department of Water Resources (DWR) *A Guide to Annual Reports, Periodic Evaluations, and Plan Amendments (Guidance)* with respect to the description of the progress on the Projects and Management Actions (PMAs) within the Basin:

· *Per the Guidance: "The discussion of the projects should include evaluations and reporting on the quantified benefits of each project and anticipated benefits of the projects that broke ground or were completed during the evaluation cycle."*

· *Per the Groundwater Sustainability Plan (GSP) Regulations § 356.4 (b): "A description of the implementation of any projects or management actions, and the effect on groundwater conditions resulting from those projects or management actions."*

- We could not find specific information in the Periodic Evaluation that consistently discusses and reports the quantified benefits of each project and management actions (PMAs). Table 3-1 and Table 3-2 of the Periodic Evaluation include the "benefits observed to date", but many projects only have qualitative descriptions. For example, Section 3.1.1 discusses the new extraction allocation system that supports the implementation of the two management actions (Reduction in Groundwater Production and Water Market Pilot Program) identified in the Oxnard Plain Groundwater Sustainability Plan (GSP). However, the quantified benefits of these PMAs are not discussed in the relevant section or Table 3-1. Please confirm the Periodic Evaluation meets the guidance provided by the DWR.

· *Per the Guidance: "A GSA should assess the projects and management actions outlined in the original GSP and explain whether those are still relevant and feasible, including estimates of cost and potential funding sources and whether permitting and CEQA requirements need to be met."*

- We could not find specific information that the Periodic Evaluation discusses the cost and potential funding sources and whether permitting and CEQA requirements need to be met for the PMAs. Please confirm the Periodic Evaluation meets the guidance provided by the DWR.

· *Per the Guidance: "Additionally, for the various projects and management actions outlined in the GSP, the GSA should describe the process for public notice and engagement of interested parties."*

- We could not find specific information that the Periodic Evaluation discusses the process for public notice and engagement of interested parties for each PMA. Please confirm the Periodic Evaluation meets the guidance provided by the DWR.

· *Per the Guidance: "For projects and management actions that are currently ongoing or have already been completed, the Periodic Evaluation should provide an evaluation and status update including realized benefits, expected benefits, and benefits and impacts to beneficial uses and users. The description should include how these projects and management actions are helping the basin achieve sustainability through the assessment of the groundwater conditions in relation to the measurable objectives for the relevant sustainability indicators. A description of the monitoring network and data related to projects and management actions that are showing progress toward sustainability, and documentation that the project is not impacting nearby beneficial users, should be included."*

- Project 1 and Project 9 are ongoing. However, we could not find specific information in the Periodic Evaluation that discusses how these projects are helping the Basin achieve sustainability through the assessment of the groundwater conditions in relation to the measurable objectives for the relevant sustainability indicators. Additionally, we could not find specific information in the Periodic Evaluation that discusses the monitoring network and data related to these projects. Please confirm the Periodic Evaluation meets the guidance provided by the DWR.

· *Per the Guidance: "Significant new information should be discussed. Such as whether a GSP project was considered no longer necessary and was dropped, …." And "The GSA should describe the challenges or setbacks that have prevented or delayed implementation of projects and management actions"*

- Project 3 Riverpark-Saticoy GRRP is inactive but the Periodic Evaluation did not discuss the reasons, challenges, or setbacks that have prevented or delayed implementation. Please confirm the Periodic Evaluation meets the guidance provided by the DWR.

- Project 5 Voluntary Temporary Fallowing is not implemented but the Periodic Evaluation did not discuss the reasons, challenges, or setbacks that have prevented or delayed implementation. Please confirm the Periodic Evaluation meets the guidance provided by the DWR.

- In Table 3-1, one of the top management actions is reduction in groundwater extraction, which has not been implemented. The Periodic Evaluation did not discuss the reasons, challenges, or setbacks that have prevented or delayed implementation. We request that the Periodic Evaluation include more details about FCGMA's desire to pursue ramp down and the potential timeline.

· *Per the Guidance: "For projects and management actions that have yet to begin or are still conceptual, assess the need for those based on the current conditions and expected outcomes of the existing projects and management actions. Describe the potential timeline to get those projects and management actions implemented or what may be needed to take them from the conceptual or as-needed phase to the "shovel ready" phase."*

- The Periodic Evaluation lists some PMAs that are in the preliminary design phase, such as Projects 2, 11, 12, 17, and 18, but the potential timeline for these PMAs could not be specifically found. Please confirm the Periodic Evaluation meets the guidance provided by the DWR.

2. It is not clear if the Periodic Evaluation fully complies with the Guidance or the GSP Regulations with respect to the description of GSP effectiveness.

· *Per the Guidance: "The GSA should evaluate current groundwater conditions for each applicable sustainability indicator relative to sustainable management criteria established in the GSP (i.e., measurable objectives, interim milestones, minimum thresholds, and undesirable results) and describe, with supporting data, whether implementation of the GSP is effective."*

· *Per the GSP Regulations § 356.4 (b): "A description of the implementation of any projects or management actions, and the effect on groundwater conditions resulting from those projects or management actions."*

- The Periodic Evaluation notes that Minimum Threshold (MT) exceedances and Undesirable Results (URs) occurred during the evaluation period. However, groundwater elevations in all key wells rebounded to be above the 2025 Interim Milestones (IMs) by spring 2024. We could not find specific information that the Periodic Evaluation clearly assesses whether the progress is due to GSP implementation or simply due to the favorable climatic conditions in 2023 and 2024. For example, a more thorough assessment of the long-term trends in Basin performance (normalized for climatic variability) would provide a clearer picture of GSP implementation effectiveness so that Basin management can be proactive to avoid URs. Please confirm the Periodic Evaluation meets the guidance provided by the DWR.

· *Per the Guidance, for each applicable sustainability indicator, consider: "Evaluate progress made (including challenges encountered, if applicable), describe any adaptive management approaches employed to address minimum threshold exceedances, whether GSP implementation is effective thus far, and any other pertinent information related to progress towards achieving sustainability." And "Have basin conditions and GSP implementation affected beneficial uses and users? For example, were there any reported dry wells during the evaluation cycle?"*

- URs occurred in spring 2015 and fall 2022 (Section 2.2.1.4), but the Periodic Evaluation only describes the adaptive management approaches in general terms, and the potential impact on beneficial uses and users due to MT exceedances or URs, such as any reported dry wells, is not discussed. Please confirm the Periodic Evaluation meets the guidance provided by the DWR.

· *Per the Guidance, for each applicable sustainability indicator, consider: "are other sustainability indicators being impacted"*

- We could not find specific information that the impact of each sustainability indicator on other sustainability indicators was discussed in the Periodic Evaluation. Please confirm the Periodic Evaluation meets the guidance provided by the DWR.

· *Per the Guidance on basin setting section, GSAs shall "describe whether changes to surface water supply reliability will affect water budget assumptions."*

- Section 4.2.2 discussed water supplies during the evaluation period and compared them to historical and projected supplies in the GSP. However, we could not find specific information that the changes to surface water supply reliability and their effect on water budget assumptions were discussed. Please confirm the Periodic Evaluation meets the guidance provided by the DWR.

3. It is not clear if the Periodic Evaluation fully addresses all of the DWR Corrective Actions.

· *DWR Recommended Corrective Action 4: Elaborate how the Agency is planning to verify that the groundwater level thresholds are adequate to assess the groundwater quality conditions in the Subbasin. Discuss how the groundwater quality data from the existing monitoring network will be used for sustainable management of the Subbasin. Coordinate with the appropriate groundwater users, as identified in the GSP, and the appropriate water quality agencies in the Subbasin to evaluate how the Agency's current groundwater management strategy is affecting the groundwater quality in the Subbasin.*

- Section 2.2.4.1 of the Periodic Evaluation discusses how the GSAs verified that the groundwater levels are adequate to assess the groundwater quality conditions.

However, we could not find specific information that the Periodic Evaluation discusses "how the groundwater quality data from the existing monitoring network will be used for sustainable management of the [B]asin" and coordination with appropriate water quality agencies in the Basin. Please confirm the Periodic Evaluation meets the guidance provided by the DWR.

- The GSP stated that there are several sources of salinity in the basin, and the GMA could not determine which is actually causing any given detrimental chloride/salinity water quality impacts. The evaluation does not indicate whether the GMA has a better understanding of this key conceptual model issue. However, all of the PMAs, including EBB, seem to be based on the assumption that salinity impacts are primarily caused by modern-day seawater intrusion. We recommend that the evaluation should assess how sustainability indicators will be affected if this assumption on the source of salinity impacts is incorrect, even partially. Also, there should be an evaluation of the effect of PMAs like EBB on the other two sources of salinity. Further, the validity of the GMA's apparent assumption that modern-day seawater intrusion is the primary source of salinity in the basin may also affect the ongoing validity of the GSP's assumption that groundwater elevation is a good proxy for all other sustainability indicators.

· *Per the DWR GSP Assessment Staff Report: "The GSP also states that the City of Oxnard's General Plan does not contain water supply assumptions, which would conflict with the sustainable management criteria or the projects and management actions proposed in Oxnard GSP. However, the City of Oxnard submitted a comment to the Department claiming that the GSP's statement is inaccurate because there are fundamental inconsistencies between the City's 2030 General Plan and the GSP. The City further states that water demand in the City could increase by 50 percent due to population growth, so the GSP's management action to reduce groundwater pumping by 40 percent is inconsistent with the City's growth assumptions, long-term strategy for groundwater management, water supply assumption, and the land use plan. Department staff encourage FCGMA to work with the City of Oxnard to rectify the difference in policies that could potentially impact SGMA implementation in the Subbasin."*

- We could not find specific information that the Periodic Evaluation addresses DWR's comment regarding reconciling the inconsistency between the City of Oxnard's 2030 General Plan and the GSP. If it is not included already, the City requests that as part of a GSP update (see also Comment #4), the City's growth and water supply assumptions be accurately reflected.

4. The Basin would benefit from a GSP Update.

· *Per the GSP Regulations § 354.44 (a): "Each Plan shall include a description of the projects and management actions the Agency has determined will achieve the sustainability goal for the basin, including projects and management actions to respond to changing conditions in the basin."*

- As FCGMA is aware, the City of Oxnard is completing the construction of a pilot Aquifer Storage and Recovery (ASR) Indirect Potable Reuse (IPR) project that is anticipated to yield as much as 2,800 acre-feet per year (AFY). Additionally, in the City's approved 5-year capital improvement program, there are several more ASR projects planned with funding identified, each with a theoretical yield of 2,800 AFY per well, for a total of 14,000 AFY. Despite prior requests, it is not clear that the IPR project has been explicitly incorporated into the GSP and the Basin groundwater flow model (Model). The City requests that as part of a future GSP update, the list of PMAs for the Basin be fully updated and reflected in both the GSP and the Model.

- For the Oxnard subbasin, Table ES-3 (page ES-4) includes a reference to significant progress on projects and programs to mitigate overdraft and seawater intrusion to include the expansion of recycled water. However, we could not find specific information to verify that the groundwater model scenarios include additional new water supply generated by implementation of both Phase I and Phase II of the City of Oxnard GREAT Program, which are expected to generate up to 14,000 AFY as noted above. Please clarify which recycled water projects are being referenced for progress towards mitigation of overdraft and seawater intrusion.

- A seawater intrusion barrier project is referenced on Table 1-1 Page 4. There is also a reference to a Seawater Injection Barrier Feasibility Study (Project 11) on Page 49. Please provide clarification on who is the lead agency for this project and please provide copies of study and the, "Preliminary groundwater modeling" referenced that "suggests that … installation of 5 to 10 injection wells landward of the eastern edge of the existing seawater intrusion front, injecting a total of 2,400 AFY, has the potential to eliminate any further inland migration of seawater in the FCA". Please provide the model input used to generate the preliminary results.

- In order to encourage the development of PMAs in the Basin, a storage accounting framework or other mechanisms should be established to protect the investments that entities make in terms of creating new water supplies that improve Basin sustainability (e.g., developing IPR and other recharge and conjunctive use projects).

- Taken together, the extreme and unique recent climatic conditions resulting in substantially larger diversions from the Santa Clara River and significant likely reliance on EBB for seawater intrusion mitigation are complex enough to warrant a GSP update. The evaluation is reliant on the 2021 technical memoranda (United Water Conservation District 2021a). The City is aware United has been working very hard to develop more current and robust analysis, which may affect the assessment of PMAs and other critical aspects of the evaluation.

· *Per the GSP Regulations § 354.8 (f): "A plain language description of the land use elements or topic categories of applicable general plans that includes the following:*

(2) A general description of how implementation of existing land use plans may change water demands within the basin or affect the ability of the Agency to achieve sustainable groundwater management over the planning and implementation horizon, and how the Plan addresses those potential effects.

(3) A general description of how implementation of the Plan may affect the water supply assumptions of relevant land use plans over the planning and implementation horizon."

· *Per the GSP Regulations § 354.18 (3)(B): "Projected water demand shall utilize the most recent land use, evapotranspiration, and crop coefficient information as the baseline condition for estimating future water demand. The projected water demand information shall also be applied as the baseline condition used to evaluate future scenarios of water demand uncertainty associated with projected changes in local land use planning, population growth, and climate."*

- Per Comment #3, above, the City requests that the City's growth and water supply assumptions be accurately reflected in a GSP update, if not already accounted for in the Periodic Evaluation.

5. The assessment of boundary flows and the impacts to Basin sustainability need to be further assessed.

· *Per the Guidance: "A list of potential additional information is provided below:*

o *Describe relevant interbasin coordination efforts."*

o *Discuss how the proposed management of the Basin (including minimum thresholds and measurable objectives) aligns with the management of adjacent basins.*

o *Describe potential impacts from adjacent basins and/or to adjacent basins due to Plan implementation*

o *Assess whether Plan implementation is affecting the ability of an adjacent basin to achieve its sustainability goal."*

· *Per the GSP Regulations § 355.4 (b)(7): "Whether the Plan will adversely affect the ability of an adjacent basin to implement its Plan or impede achievement of its sustainability goal."*

- Inflows to the Basin from the adjacent Pleasant Valley Basin and the Los Posas Basin are an important component of the Basin water budget. Updated boundary flow values are included in Table 5-2 and Section 5.2.2 of the Periodic Evaluation. However, the City is concerned about how those flows may be impacted in the future and desires that a future GSP update include a discussion and additional certainty as to how these flows will be maintained in the future, as well as an assessment as to whether Sustainable Groundwater Management Act (SGMA) implementation or the adjudication in the Pleasant Valley Basin will impact the Basin's ability to achieve sustainability.

Thank you for the opportunity to provide comments on the Periodic Evaluations. The City recommends that FCGMA conduct a GSP update for the Oxnard Subbasin and Please Valley

Basin in the near future. For specific questions regarding our comments, please contact Timothy Beaman (timothy.beaman@oxnard.org or 805.760.1837).

Sincerely,

M.L. Wolfe

Michael Wolfe, PE
Director of Public Works

From:	McGlothlin, Russell
To:	FCGMA
Cc:	Adam Phillips; Kline, Matt; Heather Welles; Kretz, Bobby; Sam Collie
Subject:	OPV Coalition's Comments on the Draft Oxnard 5-Year GSP Evaluation and the Draft Pleasant Valley 5-Year GSP Evaluation
Date:	Monday, October 7, 2024 4:48:03 PM
Attachments:	2024.10.07 Cover Letter to Tonkin GSP Evaluation Comment Letter.pdf OPV Coalition Comments on Oxnard and PV 5-Year Evaluations.pdf

FCGMA:

Please see the attached correspondence and kindly acknowledge receipt by responsive email. Thank you.

O'Melveny

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File Number:

October 7, 2024

Russell McGlothlin
D: +1 310 246 8463
rmcglothlin@omm.com

VIA EMAIL

Fox Canyon Groundwater Management Agency
800 S Victoria Ave, Ventura, CA 93009
FCGMA@ventura.org

Re: OPV Coalition's Comments on the Draft Oxnard 5-Year GSP Evaluation and the Draft Pleasant Valley 5-Year GSP Evaluation

Dear FCGMA:

Enclosed with this letter is a memorandum from the OPV Coalition's consulting hydrogeologist, Matthew Tonkin, PhD, the President of S.S. Papadopulos & Associates, Inc., providing technical comments on the Draft Oxnard 5-Year GSP Evaluation and the Draft Pleasant Valley 5-Year GSP Evaluation. We appreciate the opportunity to provide these comments and hope that the FCGMA will amend the evaluations to address our comments.

As a broader matter, we respectfully urge the FCGMA to provide a written response to all substantive comments that it receives concerning the evaluations. Various parties made extensive comments on the drafts of the original groundwater sustainability plans, but we are unaware of any amendments or responses that the FCGMA made in response to those comments. We hope that the FCGMA will be more responsive with respect to the comments that it receives on the 5-Year evaluations by identifying where amendments were made in response to the comments, or through a written explanation for why changes to the draft evaluations were not made in response to received comments.

Please contact me if you would like us to further explain or elaborate on any of the comments made in the attached memorandum or to discuss the comment process generally.

Sincerely,

Russell McGlothlin

S.S. PAPADOPULOS & ASSOCIATES, INC.
ENVIRONMENTAL & WATER-RESOURCE CONSULTANTS

Monday, October 7, 2024

Attention: Russell McGlothlin, O'Melveny & Myers, LLP

Subject: Technical Comments Concerning the Draft *First Periodic Evaluation, Groundwater Sustainability Plan for the Oxnard Subbasin* and the Draft *First Periodic Evaluation Groundwater Sustainability Plan for the Pleasant Valley Basin* (August 2024)

Pursuant to your request, I have reviewed the Draft *First Periodic Evaluation, Groundwater Sustainability Plan for the Oxnard Subbasin* (August 2024: referred to herein as the "Oxnard Evaluation"), and the Draft *First Periodic Evaluation, Groundwater Sustainability Plan for the Pleasant Valley Basin* (August 2024: referred to herein as the "Pleasant Valley Evaluation"). Both Evaluations were prepared for Fox Canyon Groundwater Management Agency (FCGMA) by Dudek.

Overall, the Evaluations provide well-organized overviews of planning, monitoring, management and analysis activities focused on the period 2020 and 2024, including how FCGMA responded to Corrective Actions recommended by the Department of Water Resources (DWR) on the Oxnard Subbasin's and the Pleasant Valley Basin's respective GSPs. The Evaluations also present several appropriate strategies for improving understanding of the basins, including installing new monitoring wells and using transducers/dataloggers in selected wells. I provide herein several comments and recommendations to be transmitted to the FCGMA which are intended to help clarify understanding regarding the basins' hydrogeology, resources, and sustainability criteria.

Both Evaluations rely heavily upon groundwater modeling for many analyses, including (1) estimating water budgets and groundwater storage changes; (2) estimating the extent of seawater intrusion; (3) simulating hypothetical management scenarios that contrast "baseline" conditions with alternative pumping scenarios and some with future projects; (4) proposing changes to Measurable Objectives and Minimum Thresholds; and (5) evaluating and contrasting potential future management alternatives. The reliability of these various model-driven analyses hinges on the accuracy and reliability of the groundwater model(s) used to conduct them.

Although the FCGMA has provided workshops and limited text-based outputs from some model simulations, it has not made available the groundwater model input and output files necessary to independently evaluate the appropriateness, accuracy, and reliability of the modeling and the conclusions and recommendations that the FCGMA derives from modeling as presented in the Evaluations. I understand this is because United Water Conservation District (United) controls the models used and has so far refused to share the groundwater model files with the Basin's stakeholders—including the OPV Coalition—for quality assurance review. In effect, United and the FCGMA are signaling to stakeholders to trust in the reliability of the modeling and related recommendations, while providing no opportunity for their constituents to conduct a thorough review. This is inconsistent with the intent to foster public participation and engagement in the

GSP evaluation process, fostering instead distrust of the technical analyses underpinning significant water resource management decisions in the basins.

Recommendation #1: Given that historical peer reviews conducted on the models were completed at the discretion of United and FCGMA, and that those reviews did not assess recent revisions to the models, I recommend, in the interest of transparency, quality assurance, and diversity of opinion that either an arms-length independent review strategy be implemented or, preferably, that FCGMA and United agree to disclose the model(s) for review by the basin's stakeholders consistent with numerous previous requests.

I offer below several additional specific comments and recommendations on the Evaluations that in my opinion are necessary to build trust in the Evaluations, the modeling that was relied upon in those evaluations, and the GSP process as a whole.

Recommendation 2: The Evaluations should clearly distinguish observed data from model outputs.

> Explanation: It is important to distinguish measured data from model outputs: model outputs are not data. The Evaluations conflate interpretations based on monitoring data with outputs from groundwater models, as illustrated by these example statements from the Executive Summary of the Oxnard Evaluation: "*While groundwater elevations are higher than they were in 2015, available groundwater quality and numerical modeling data indicate that the Subbasin experienced additional seawater intrusion over the evaluation period*" and "*As anticipated in the GSP, numerical modeling data suggests that since 2015, approximately 140,000 acre-feet of groundwater was added to the Subbasin, and 113,600 acre-feet of seawater has intruded into the Subbasin.*" Absent substantial changes such as achieved through re-calibration, model outputs will continue to show outputs analogous to those obtained previously (e.g., during preparation of the GSP), and this does not verify previous modeling or provide greater confidence in any conclusions. For the Evaluations, it is more important to determine (a) what the mapped salinity data indicate, (b) how measured data compare with previous model outputs and projections, and (c) whether differences in this comparison are substantial enough to warrant model revisions including structural changes or re-calibration.

Recommendation 3: The Evaluations should state the reasons and technical bases for proposed revisions to Measurable Objectives and Minimum Thresholds.

> Explanation: Changes are proposed to the Measurable Objectives and Minimum Thresholds, but the reasons and technical basis are not given. For example from the Oxnard Evaluation Section 2.2.1.8: "*Based on the updated simulations, revisions are recommended to 9 minimum threshold groundwater elevations established in the GSP (Table 2-2, Minimum Threshold and Measurable Objective Groundwater Elevations for the Oxnard*

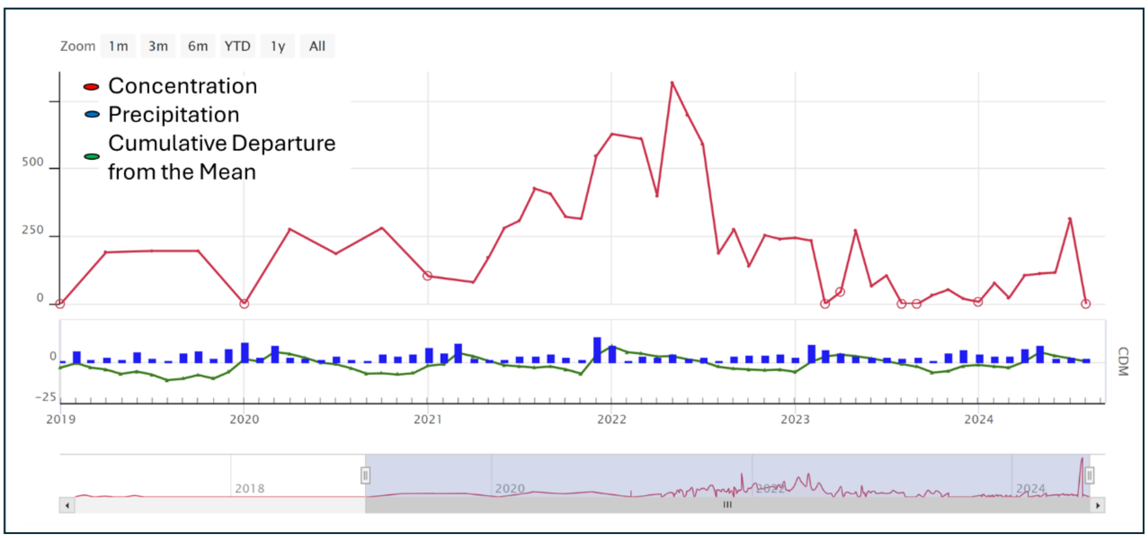
Subbasin). Eight of the recommended revisions are for wells located within the Saline Intrusion and Oxnard Pumping Depression management areas" and "*Future scenario modeling was updated as part of this Periodic GSP evaluation. Two simulations were identified that minimize seawater intrusion and maximize total groundwater production from the Subbasin, PVB, and West Las Posas Management Area (WLPMA)… The simulated groundwater elevations from the NNP 3 scenario were used to develop recommended revisions to SMCs for the Subbasin."* Current Measurable Objectives and Minimum Thresholds were based on groundwater modeling, and the proposed changes appear to be based on a newly modeled scenario. The groundwater model is clearly playing a central role for FCGMA in determining these criteria, but it is unclear how it is being used to develop qualitative and quantitative recommendations. Thus, much greater explanation is necessary so that proposed changes can be understood and evaluated.

Recommendation 4: Given the growing body of monitoring data, the Evaluations should provide updates on the relationship between water levels and SGMA sustainability indicators and explain whether and when FCGMA and Dudek anticipate using direct measurements of these indicators in place of water levels.

Explanation: At the present time, FCGMA uses water levels as a surrogate for the SGMA sustainability indicators. However, the body of monitoring data is growing and is incorporating more direct measurements of sustainability criteria. For example, the Oxnard Evaluation presents data and information regarding changes in chloride concentrations pertaining to seawater intrusion, which is a sustainability indicator under SGMA. With regard to subsidence, which is also a SGMA sustainability indicator, the Oxnard Evaluation also states that (Table 1-1. Summary of New Information Since GSP) "*DWR InSAR data are now available to examine land subsidence in the Oxnard Subbasin.*" The Pleasant Valley Evaluation states similarly (again, in Table 1-1. Summary of New Information Since GSP). The Evaluations should discuss what was learned over the monitoring period regarding the reliability of water levels as a surrogate for SGMA sustainability indicators, including whether correlations that were previously developed between changes in water levels and SGMA sustainability indicators have been validated or will be updated, and whether and when FCGMA anticipates ultimately replacing the water level surrogate with the direct measurements.

Recommendation 5: Monitoring data relied upon in the Evaluations should be made publicly available.

Explanation: In the Evaluations, model outputs and monitoring data are used to interpret progress toward sustainable management and recommend changes to Measurable Objectives and Minimum Thresholds. However, it is unclear what specific role monitoring data played in these decisions, since changes evident in some monitoring data – such as increases in chloride concentrations – are only available to stakeholders occasionally and in an incomplete fashion via reports and workshops. The Evaluations would facilitate better communication, understanding, and transparency by making monitoring data available in a format enabling stakeholders and the public to access, view, and interpret them. For example, the relationship between water levels and salinity (chloride) and the role of very wet or dry conditions on these relationships can be depicted and evaluated using mixed line-and-bar type charts. Such plots are available, for example, via the HiCharts charting library which enables sharing of data and plots over the web (www.highcharts.com). An example is provided below: the data in this example plot are unrelated to either the Oxnard Evaluation or the Pleasant Valley Evaluation, but similar plots could easily be made using the data that presumably supported both Evaluations. Once developed, updating of these plots with newly acquired data is a trivial task.



Recommendation 6: The Evaluations should clarify the number of "key wells" and whether those are uniquely screened within individual aquifer units or span multiple aquifer units.

Explanation: The Oxnard Evaluation provides contradictory statements regarding the number, and screened aquifer unit, of key wells. For example, its Executive Summary states "*The GSP established minimum threshold and measurable objective groundwater elevations at 34 representative monitoring points, or "key wells" in the Subbasin.*" Section 2.2.1.4 states (a) "*In any single monitoring event, water levels in 6 of the 14 key wells are below their respective minimum threshold*[7]" and refers to footer #7 which states "*15 wells were referenced in the GSP. However, only 14 key wells are screened in the UAS.*" and (b) "*During the evaluation period, groundwater elevations occurred below the historical low*

> *groundwater elevations at 9 of the 15 key wells screened in the UAS and 11 of the 19 key wells screened in the LAS.*" Section 2.2.1.4 thus refers to 14 key wells in the UAS, with reference to footer 7, but later refers to 15 key wells; whereas the Executive Summary and other locations in the Oxnard Evaluation refer to 19 key wells in the LAS and 34 key wells in total from which a count of 15 key wells is obtained for the UAS contradicting footer #7. Both the Oxnard Evaluation and the Pleasant Valley Evaluation should clarify the number of "key wells" and whether those are uniquely screened within individual aquifer units or span multiple aquifer units.

Recommendation 7: The Evaluations should clearly recognize apparent progress toward sustainable conditions achieved through pumping curtailment and other basin management actions and distinguish this clearly from apparent progress achieved through favorable changes in climatic conditions.

> Explanation: The Oxnard Evaluation contains positive statements regarding progress. For example, the Executive Summary states "*Under average climate conditions, the interim milestones targeted groundwater elevation recoveries that averaged approximately 14 feet in the UAS and approximately 22 feet in the LAS over the first five years of GSP implementation. The groundwater elevations measured in spring 2024 ranged from approximately 5 to 117 feet higher than those in spring 2015. Importantly, groundwater elevations in spring 2024 were higher than the minimum thresholds in 21 of the 27 key based upon the available data. FCGMA anticipates that the general trend of rising groundwater elevations will continue through 2040 with continued implementation of the GSP.*" Likewise Section 2.2.1.5 states "*The introduction of new recycled water supplies, reduction in groundwater pumping, and historically high recharge have reversed the downward trend in groundwater elevations in the Subbasin.*" Similar statements are made in the Pleasant Valley Evaluation. Increased water levels and other indicators are indeed positive, however, the vast majority of this apparent progress likely results from very wet recent conditions, with the introduction of new recycled water supplies and reductions in groundwater pumping only minor contributors. An effort should be made to determine to what extent these projects contributed to the changed conditions versus the historically high recharge.

Recommendation 8: The Evaluations should clarify and expand upon the proposed use of transducer/dataloggers.

> Explanation: As noted in the Oxnard Evaluation Section 2.2.1 "*Water year groundwater elevations are characterized using seasonal low and seasonal high measurements. Seasonal low groundwater elevations are defined in the GSP as groundwater elevations measured between October 2 and October 29 and seasonal high groundwater elevations are defined in the GSP as groundwater elevations measured between March 2 and March*

> *29.*" The Oxnard Evaluation proposes installation of transducer/dataloggers (Section 3.2.7 Project No. 12: Installation of Transducers in Groundwater Monitoring Wells). The Pleasant Valley Evaluation also proposes installation of transducer/dataloggers (Section 3.2.10 Project No. 11: Installation of Transducers in Groundwater Monitoring Wells). The installation of transducers/dataloggers is an important improvement to the monitoring program to mitigate data gaps. However, it is unclear whether the transducer/dataloggers will (a) be installed only for two weeks at each (spring/fall) event or will (b) remain in place for a much longer time and a two-week data window retrieved for this specific use. Installation of transducer/dataloggers for the March and October events would improve the comparability of data retrieved at individual synoptic events but offer limited additional value whereas leaving the instruments in-place for an extended time would enable the actual timing of seasonal low and high values each year to be determined (which are weather dependent and may not fall in these months) enabling comparability between synoptic events as well as within them, and improving understanding of the aquifer response to changes in recharge, pumping, and projects.

Recommendation 9: The Evaluations should be consistent in their analysis and comparison of actual and potential projects and their value for water resources management.

> Explanation: Note c to Table ES-3 of the Oxnard Evaluation states that it "*Excludes the 10,000 AFY of simulated brackish water extractions from the Subbasin via United Water Conservation District's Extraction Barrier and Brackish Water Treatment project extraction wells*." Where is this extraction accounted for? Given that the extracted water is brackish, and likely to increase in salinity over time, there should be an accounting of this withdrawal possibly with a fresh-saline apportionment when weighing the relative value of this potential project to the sustainability of the basins' water resources.

Recommendation 10: The Evaluations should state whether cross-aquifer flows and migration of salts have been considered in the conceptual site model (CSM) and in groundwater modeling.

> Explanation: Section 3.2.5 of the Oxnard Evaluation (Project No. 10: Destruction of Abandoned Wells), states that abandoned and potentially cross-connecting wells will be properly destroyed. This is an important activity to reduce the potential for migration of poor-quality water between aquifers. Such cross-connections can sometimes be a significant component of the water budget: the Evaluations should clearly state whether the locations and rates of historical cross-connection have been considered in the Basins' CSM and whether the model simulations and water budgets considered these flows and the migration of salts.

Recommendation 11: The Evaluations should state whether additional modeling was performed following the May 30, 2024 Technical Discussion Workshops.

Explanation: There are differences in the scenario results presented in the May workshops and those presented in the August Evaluations including for example the tabulated budgets for the NNP1,2,3 scenarios presented in the Oxnard Evaluation. Similar differences appear when comparing the workshop presentation materials with the August Pleasant Valley Evaluation as well. Please explain if additional modeling was conducted after the May workshop results were presented, or if there is another cause for these differences.

Recommendation 12: The Evaluations should state when model documentation will be made available.

Explanation: Section 5.1.3 of the Oxnard Evaluation (Model Extension and Recalibration) states that "*As part of this periodic evaluation, UWCD extended the Coastal Plain Model to simulate groundwater conditions in the Subbasin through the end of water year 2022 (i.e., September 30, 2022). During the model update and extension process, UWCD recalibrated the Coastal Plain Model. This recalibration effort involved incremental adjustments to local hydraulic conductivity, storativity, and boundary conductance values which resulted in better simulation of groundwater conditions along the coastline (details to be included in UWCD's Coastal Plain Model update technical memorandum)*." A similar statement is made in the Pleasant Valley Evaluation (again, in Section 5.1.3 Model Extension and Re-Calibration). When will the Coastal Plain Model Technical Memorandum (TM) be made available? To complete a thorough review of the conclusions and recommendations presented in the Evaluations, and to dispel any concerns regarding the reliability of the modeling, it is essential to have access to this TM detailing updates to the groundwater model(s) that underpinned these basins' Evaluations.

Thank you for the opportunity to review the Evaluations and provide you these comments for submittal to the FGCMA.

With regards,

S.S. PAPADOPULOS & ASSOCIATES, INC.

Matthew Tonkin, PhD

President, SSP&A

At the January 22, 2025 meeting of the FCGMA Board of Directors, the Board directed that the following statement be included in this Periodic Evaluation:

The eastern portion of the Pleasant Valley basin has a complex relationship with inflows from neighboring basins, both in terms of water quantity and water quality. For example, the City of Camarillo's desalter serves not only the City's water supply needs, but also addresses a water quality concern identified by the Los Angeles Regional Water Quality Control Board. FCGMA continues to work with the City and Camrosa Water District to incorporate these concerns into the groundwater sustainability plan (GSP) and this Periodic Evaluation should not be understood to prejudice further analysis of those issues in the eastern Pleasant Valley basin as the GSP is updated.

CAMROSA WATER DISTRICT
BUILDING WATER SELF-RELIANCE

Board of Directors
Fox County Groundwater Management Agency
800 South Victoria Avenue
Ventura, CA 93009-1600

Submitted via email to: FCGMA@ventura.org

December 13, 2024

Re: Comments on the "First Periodic Evaluation, Groundwater Sustainability Plan for the Pleasant Valley Basin" December 2024

Board of Directors:

We are disappointed with the updated draft of the "First Periodic Evaluation, Groundwater Sustainability Plan for the Pleasant Valley Basin" (Evaluation) and request that the Board reject this draft as written for submission to the California Department of Water Resources (DWR). This updated draft is not responsive to our and others' comments on the original draft documents. Specifically, this draft, 1) does not remove the declarations that pumping in the Pleasant Valley Basin (PVB) impacts seawater intrusion in the Oxnard Subbasin and, 2) does not provide a full discussion of the model scenarios and model simulation results to disclose all effects associated with pumping reductions and/or redistributions, which are critical for stakeholders to understand and provide feedback for decision making. As a result, we request that the Evaluation be revised to address these major issues before submission to DWR. Attachment 1 provides our proposed changes to the Evaluation, which we believe most accurately reflects basin conditions based on current data while recognizing that further evaluation is needed. These changes can be accommodated easily, with minimal effort, and will not result in a delay in submission of the documents.

We are very concerned about the multiple declaratory statements in the documents that pumping in the PVB impacts seawater intrusion in the Oxnard Subbasin. As we stated in our comments on the August draft of the Evaluation (and in our past comments on the GSP), we do not believe this statement is supported by the simulations conducted by UWCD using their Coastal Plain Model. We met with GMA staff and United Water Conservation District staff on September 27th to review details of our concerns about the declaratory statements and lack of transparency and to request a more comprehensive disclosure of the groundwater model simulations and model results. Since this meeting, we have been disappointed by the lack of response to our questions and concerns regarding model scenario simulations, input algorithms, assumptions, and subsequent conclusions. At the October 23rd GMA Board meeting, Dudek attempted to address the comment regarding pumping in PVB impacts to seawater intrusion in the Oxnard Subbasin, but we found that response was lacking and disingenuous. Attachment 2 provides our detailed response to Dudek's presentation on this topic.

We recommend that all discussion of the future scenarios and groundwater flow model simulation results of those scenarios be removed from the documents. It is premature to provide these discussions in the documents. It is clear from our comments and others' comments that the assumptions used in developing these scenarios have not been fully vetted and accepted by various affected stakeholders. In addition, there needs to be a more comprehensive disclosure of the model simulation results as described in our comments and as discussed with GMA and United Water Conservation District staff at the September 27th meeting. For example, the only model budget results described in the documents include differences of interbasin flows (between Oxnard Subbasin, PVB, and West Las Posas Basin) and seawater intrusion. Many more important impacts on water budgets need to be disclosed and discussed with stakeholders, which may be a driver for other solutions. For example, the changes in Oxnard Subbasin water budget terms between the calibrated historical model and the NNP3 scenario include the following:

- Flow from the Semi-perched aquifer to the principal aquifer (UAS+LAS) in the Oxnard Subbasin is reversed. Instead of there being 11,600 AFY of recharge to the principal aquifers, the principal aquifers discharge nearly 4,000 AFY to the Semi-perched aquifer, which is then lost to stream discharge, drain flow, or evapotranspiration. This is a 15,600 AFY net loss to the principal aquifers.

- Recharge from the Mound Basin to Oxnard Subbasin principal aquifers in the calibrated model is about 2,600 AFY, whereas in the NNP3 scenario, this recharge is lost and the Oxnard Subbasin discharges about 2,400 to the Mound Basin. This is a nearly 5,000 AFY reversal and loss to the Oxnard Subbasin.

- Recharge from the Santa Paula Basin to Oxnard Subbasin principal aquifers in the calibrated model is about 1,700 AFY, whereas in the NNP3 scenario, this recharge is reduced to about 800 AFY, a loss of 900 AFY to the Oxnard Subbasin.

- Recharge of the principal aquifers from stream percolation in the Oxnard Subbasin is about 7,200 AFY in the calibrated model, whereas in the NNP3 scenario, the principal aquifers discharge about 900 AFY to streams for a net loss to the Oxnard Subbasin of about 8,100 AFY.

- Discharges to drains and evapotranspiration in the Oxnard Subbasin, increases from about 17,800 AFY in the calibrated model to over 29,800 AFY in the NNP3 scenario, a 12,000 AFY increase.

None of these water budget changes are discussed in the documents and yet these changes are substantial and likely not desirable outcomes given the loss in water supplies to the subject basins. In order to identify and develop acceptable solutions to overdraft conditions, there needs to be a comprehensive disclosure of the modeling results for all stakeholders to weigh in on the results, seek alternative, more robust solutions, and for decision-makers to make informed decisions. It would be beneficial for the GMA to ensure that stakeholders have ample opportunity to review and provide feedback on the evaluations. Further stakeholder collaboration and analysis are needed to ensure that this evaluation provides a solid, science-based foundation for future policy decisions.

In summary, we commend the GMA on its efforts thus far. The work done on the GSP Evaluation is a significant step towards further understanding of basin dynamics and achieving sustainability. The current evaluation offers valuable concepts and some potential projects and management actions, which, in our opinion, remain somewhat conceptual and need further development. We believe that the GMA could play an important leadership role in collaborating with stakeholders to develop a comprehensive Master Plan, with clear, vetted, science-driven objectives, actionable projects, and management actions centered around sound policy that will guide the path forward toward sustainability. We look forward to this collaborative effort with the GMA and other stakeholders.

Please contact me by email or phone with any questions or concerns.

Sincerely,

Norman Huff
General Manager
Email: normanh@camrosa.com
Phone: (805) 256-3318

Attachment 1

Proposed Revisions to "First Periodic Evaluation, Groundwater Sustainability Plan for the Pleasant Valley Basin," December 2024

Note: Pages referenced correlate to the page number in the "Pleasant Valley Basin Periodic Evaluation Redline" version provided for on: https://fcgma.org/gsp-evals-draft-comments/

p. ES-2, Current Groundwater Conditions. Delete the second sentence.

"Three principal aquifers are defined in the PVB: the older alluvium, which is time equivalent to the Upper Aquifer System (UAS) in the Oxnard Subbasin, the Fox Canyon aquifer (FCA), and the Grimes Canyon aquifer (GCA) (FCGMA 2019). The FCA and GCA compose the Lower Aquifer System (LAS) in the PVB. ~~Groundwater production for agricultural, municipal, and industrial use in the PVB, specifically near the boundary with the Oxnard Subbasin, has contributed to seawater intrusion in both the UAS and LAS of the Oxnard Subbasin (FCGMA 2019).~~ This first Periodic Evaluation of the GSP evaluates impacts of climate, water usage trends, and groundwater management decisions on groundwater conditions in the UAS and LAS between water year 2020 and water year 2024. For context, this first Periodic Evaluation of the GSP provides information on groundwater elevation and groundwater quality changes since calendar year 2015, which is the last data reported in the GSP."

p. ES-2, Current Groundwater Conditions, para. 3. Delete this paragraph.

"~~While groundwater elevations in most areas are higher than they were in 2015, available groundwater quality and numerical modeling data indicate that groundwater elevations in the PVB and adjacent Oxnard Subbasin contributed to seawater intrusion in the Oxnard Subbasin~~."

p. ES-2, Relationship to the Sustainable Management Criteria, para. 1. Delete 3rd sentence.

"The GSP established minimum threshold and measurable objective groundwater elevations at 9 representative monitoring points, or "key wells", in the PVB. These SMCs were established to avoid undesirable results associated with chronic lowering of groundwater levels, depletion of groundwater in storage, degradation of water quality, and land subsidence in the PVB (FCGMA 2019). ~~Additionally, groundwater elevations below these SMCs have the potential to exacerbate seawater intrusion in the Oxnard Subbasin (FCGMA 2019)~~. In 2015, groundwater elevations were below the minimum thresholds at 8 of the 9 key wells."

p. ES-3, State of Overdraft, para. 1. Delete the first two sentences.

"~~While groundwater elevations in the PVB have historically recovered over climatic cycles, overdraft in the PVB has contributed to seawater intrusion and the migration of saline water in the adjacent Oxnard Subbasin. To better characterize the degree of overdraft currently occurring in the PVB, the sustainable yield was re-evaluated through multiple new future condition numerical groundwater flow modeling scenarios~~."

p. ES-3, State of Overdraft, para. 1. Revise the 3rd through 5th sentences to read as follows:

"In the event that no new projects are implemented in the PVB and Oxnard Subbasin, the sustainable yield of the PVB was estimated to be ~~11,200~~ 11,600 AFY <u>in the GSP</u>. Groundwater production from the PVB currently exceeds this estimate by approximately ~~3,300~~ 2,870 AFY. Actual overdraft may ~~exceed~~ <u>be less than or exceed</u> this estimate due to uncertainty in the estimated sustainable yield."

p. ES-4, Future Groundwater Conditions. Revise this section as follows:

"Under Future Baseline conditions, groundwater production is anticipated to exceed the sustainable yield ~~by approximately 2,700 AFY~~. To address this, FCGMA and other agencies in the PVB and Oxnard Subbasin have made significant progress developing projects and management actions that mitigate overdraft by 2040. These include:

- The development and implementation of a fixed extraction allocation system that places an upper bound on the total allowable annual extractions available to each operator in the PVB.
- The development and implementation of projects and policies, which expand availability and usage of recycled water.
- The development and implementation of projects that increase surface water diversions from Santa Clara River for recharge in the Oxnard Subbasin and delivery for use in the PVB, in lieu of groundwater.
- The development and evaluation of seawater intrusion barrier projects that create new water supplies and increase the sustainable yield of the PVB and Oxnard Subbasin.

The benefits of future projects and management actions, and their ability to mitigate overdraft, ~~were~~ are being evaluated through numerical modeling and will be presented in a future Evaluation Report. ~~(Table ES-3, Estimated Project-Related Future Sustainable Yield)~~."

Delete Table ES-3.

p. 7, Current Groundwater Conditions, Background, para 3. Delete the 4th sentence:

"The sustainability goal for the PVB established in the GSP is: "to maintain a sufficient volume of groundwater in storage in the older alluvium and the LAS so that there is no net decline in groundwater elevation or storage over wet and dry climatic cycles" (FCGMA 2019). Additionally, "groundwater levels in the PVB should be maintained at elevations that are high enough to not inhibit the ability of the Oxnard Subbasin to prevent net landward migration of the saline water impact front" in the Oxnard Subbasin after 2040 (FCGMA 2019). Groundwater elevation minimum thresholds and measurable objectives were established at representative monitoring points, referred to as "key wells," in the GSP (Figure 2-2; Representative Monitoring Points in the Pleasant Valley Basin). ~~The measurable objective water levels are "the groundwater levels throughout the PVB at which there is neither seawater flow into, nor freshwater flow out of the UAS or LAS in the Oxnard Subbasin" (FCGMA 2019).~~ The minimum threshold water levels are water levels that allow declines during periods of future drought to be offset by recovery during future periods of above-average rainfall (FCGMA 2019)."

p. 9, Current Conditions Related to Sustainability Indicators, para. 2. Revise this paragraph as follows:

"~~Changes to the SMC are included in each subsection. These revised SMC will serve as the basis for evaluating groundwater sustainability over, at a minimum, the next 5 years of GSP implementation.~~" There are no proposed changes to the SMCs at this time."

p.14, Interim Milestones, second para. Delete the last sentence.

"Groundwater elevations the PVB are influenced by water year type and the availability of surface water for recharge and use in lieu of groundwater. Because of this, there may be periods of declining groundwater elevations during dry water years. Despite this, FCGMA anticipates that groundwater elevations will continue to rise between 2025 and 2040 with the implementation of projects and management actions. The one exception to this is in the NPVMA, where operation of the NPV

Groundwater Desalter Project is anticipated to cause groundwater elevation declines over the next 25 years. ~~Future scenario modeling indicates that groundwater elevations in this part of the PVB will recover to pre-project levels by 2070 (Section 5, Updated Numerical Modeling)~~."

p. 14, Undesirable Results. Revise as follows:

"Chronic lowering of groundwater levels resulting in a significant and unreasonable depletion of supply is an undesirable result applicable to the PVB. Chronic lowering of groundwater levels is also associated with depletion of groundwater in storage, degradation of groundwater quality, and subsidence (FCGMA 2019). In addition, while direct seawater intrusion is not a concern in the PVB, groundwater elevations in the PVB could impact groundwater elevations in the Oxnard Subbasin to the west. Consequently, chronic lowering of groundwater levels in the PVB has the potential to exacerbate seawater intrusion in the Oxnard Subbasin and may inhibit the ability of the Oxnard Subbasin to prevent net landward migration of the saline water impact front after 2040. This potential is greatest in the PVPDMA, which is adjacent to the Oxnard Subbasin. Declines in groundwater elevation in the eastern part of the NPVMA are less likely to influence seawater intrusion in the Oxnard Subbasin."

p. 16, Changes to the Sustainable Management Criteria, para. 1. Revise as follows:

"The GSP established minimum threshold and measurable objective groundwater elevations that ~~protect against net seawater intrusion in the UAS and LAS of the Oxnard Subbasin~~ avoid chronic lowering of groundwater levels and storage in the PVB, and provide flexibility to operate projects in the NPVMA that improve groundwater quality (FCGMA 2019). These SMC were based on results from future scenario modeling using the Ventura Regional Groundwater Flow Model (VRGWFM; UWCD 2018)."

p. 16, Changes to the Sustainable Management Criteria, para. 2. Delete this paragraph.

~~"Future scenario modeling was updated as part of this 5-Year GSP evaluation. Two simulations were found to be sustainable in the PVB, Oxnard Subbasin, and WLPMA: No New Projects (NNP) 3 and Future Baseline with the United Water Conservation District (UWCD) Extraction Barrier Brackish (EBB) Water Treatment project (Section 5.2, Future Scenario Water Budgets and Sustainable Yield). The simulated groundwater elevations from the NNP 3 scenario were compared to the minimum thresholds and measurable objectives in the GSP (Section 6). The comparison indicated that there are multiple combinations of groundwater elevations that can result in both the PVB and the adjacent Oxnard Subbasin reaching their respective sustainability goals. Consequently, no changes are recommended to the minimum thresholds based on the updated model scenarios run for this periodic evaluation."~~

p. 19. Groundwater In Storage Changes. Add the following paragraph to the end of this section.

"It is important to acknowledge that Camrosa Water District (CWD) has exchanged Conejo Creek Project (CCP) surface water for pumping credits in the PVB under FCGMA Ordinance 2014-01. CWD is developing the infrastructure to pump their accrued pumping exchange credits and future pumping exchange credits. As of December 2023, Camrosa has accrued pumping credits of 31,078 AF which are part of the current groundwater storage of the PVB."

p. 24, Undesirable Results, para. 1. Revise as follows:

"Groundwater levels are used as a proxy for undesirable results associated with groundwater in storage. Groundwater elevations in both the Older Alluvium and LAS were below the minimum threshold groundwater elevations between January 2016 and the end of water year 2022. Because groundwater elevations are used as a proxy for groundwater in storage, groundwater elevations below the minimum thresholds suggest that PVB experienced undesirable results associated with reduced groundwater in storage~~ and that groundwater levels are not yet high enough to allow the Oxnard Subbasin to meet its sustainability goal~~. This conclusion is supported by the results of the VRGWFM, which suggests that groundwater in storage declined by approximately 10,000 AF in the PVB between January 2016 and the end of water year 2022."

p. 26, Seawater Intrusion Changes, para. 1. Revise paragraph as follows:

"The PVB is not impacted by direct seawater intrusion. However, groundwater elevations in the PVB <u>might</u> impact the Oxnard Subbasin's ability to mitigate seawater intrusion. A description of seawater intrusion changes over the evaluation period in the Oxnard Subbasin is provided in the First Periodic GSP Evaluation for the Oxnard Subbasin (FCGMA 2024b)."

p. 41, Table 3-1. Revise text under column labeled "Estimated Accrued Benefits at Completion" as follows:

"Recovery of groundwater levels ~~that have contributed to seawater intrusion in the Oxnard Subbasin~~ <u>to meet minimum thresholds and measurable objectives</u>."

p. 61, Hydrostratigraphic Information, para. 2. Revise as follows:

"While these hydrostratigraphic model updates are not specific to the PVB, they help to improve understanding of ~~the impacts of~~ groundwater conditions in the PVB ~~on seawater intrusion in~~ and groundwater flow between the PVB and the Oxnard Subbasin. These revisions are described in FCGMA (2024b)."

p. 70, Table 4-5, footnote a. Add the following sentence to the end of this footnote:

"Estimated by using 44% of the total Conejo Creek water delivered by CWD to PVCWD. This division is based on the fraction of PVCWD's service area that overlies the PVB. <u>Future analysis should be done to determine the appropriate basin allocation based on basin deliveries.</u>"

p. 71, Comparison to Projected Surface Water Supplies, para. 2. Add the following sentence to the end of this paragraph.

"<u>CWD's deliveries of Conejo Creek Project water are subject to CWD's policies regarding its uses of water supplies, so future deliveries could vary from those stated here</u>."

p. 72, Other Imported Water Supplies. Add the following sentences to the end of this section.

"CWD pumps groundwater from the Arroyo Santa Rosa Valley Basin (DWR Basin No. 4-007) and Tierra Rejada Basin DWR Basin No. 4-015) for use within the PVB (Table 4-7). Over the 2020 to 2023 period, CWD imported an average of approximately 2,000 AFY of groundwater from these two basins (Table 4-7). This is an increase in imported groundwater supplies of approximately 70% compared to the historical average (FCGMA 2019). <u>Some of the data provided for Table 4-7 includes estimates and/or averages based on the best currently available allocation calculations. CWD is in the process of refining the allocation calculations for water produced outside the PVB (Arroyo Santa Rosa Valley and Tierra Rejada basins) delivered within the PVB.</u>

p. 73, Other Imported Water Supplies. Correct typo, should be Rosa.

CWD anticipates importing approximately 1,800 AFY of groundwater from the Arroyo Santa <u>Rosa~~e~~</u> and Tierra Rejada basins for future water supplies (Section 5.2.1.4, Future Projects and Water Supply).

p. 70, Table 4-8, footnote a. Add the following sentence to the end of this footnote:

"Estimated by using 44% of the total Conejo Creek water delivered by CWD to PVCWD. This division is based on the fraction of PVCWD's service area that overlies the PVB. Future analysis should be done to determine the appropriate basin allocation based on basin deliveries."

p. 75, Comparison to Projected Recycled Water Supplies, last para. Please add the following sentence to the end of this paragraph.

"CWD's deliveries of recycled water are subject to CWD's policies regarding its uses of water supplies, so future deliveries could vary from those stated here."

p. 77, Updated Numerical Modeling. Revise para. 2 as follows:

"As part of this GSP evaluation of the PVB, the VRGWFM was updated to re-evaluate projected future conditions in and validate the model's ability to reproduce groundwater elevations measured between January 1, 2015, and September 30, 2022. This updated model is being used to simulate updated future scenarios and update estimates of sustainable yield of the PVB. FCGMA is working with stakeholders to review these updates. The results of this additional groundwater modeling work will be included in a future GSP Evaluation Report. ~~Section 5.1, Model Updates, describes the updates to the model since development of the GSP and Section 5.2, describes the updated future scenario modeling performed for this GSP evaluation, along with updated estimates of the sustainable yield of the PVB~~."

p. 102, Sustainable Management Criteria. Revise para. 1 as follows:

"The GSP established minimum threshold and measurable objective groundwater elevations that protect against net chronic lowering of groundwater levels and storage in the PVB, provide flexibility to operate projects in the NPVMA that improve groundwater quality, and minimize potential for impacts to the Oxnard Subbasin to meet its sustainable yield ~~mitigate net seawater intrusion in the UAS and LAS of the Oxnard Subbasin (FCGMA 2019)~~. These SMC were established based on simulation results from the VRGWFM (FCGMA 2019). As noted in Section 5.2, Future Scenario Water Budgets and Sustainable Yield, future scenario modeling is being conducted as part of the ~~was updated as part of this~~ periodic evaluation, which will be presented in a future GSP Evaluation Report. Based on preliminary modeling, another potential future scenario appears to be sustainable, the ~~Two model runs were found to be sustainable: the NNP 3 and~~ Future Baseline with EBB."

p. 102, Sustainable Management Criteria. Revise para. 3 as follows:

"Recommendations for SMC that account for EBB will be ~~are~~ discussed in a future GSP Evaluation Report. ~~Section 6.2.3, Potential Sustainable Management Criteria with Implementation of EBB. These SMC are included to provide a framework for future management objectives in the event that EBB is successfully implemented in the Oxnard Subbasin~~. FCGMA and other agencies in the PVB will assess the appropriateness of managing toward these criteria as Phase I of the EBB project is implemented in the Oxnard Subbasin."

p. 102, Minimum Thresholds. Revise section as follows:

"~~Consistent with the GSP, the minimum threshold groundwater elevations were evaluated by comparing the GSP-defined minimum threshold groundwater elevations to the lowest simulated groundwater elevation after 2040 from the NNP 3 simulation (Figures 6-1 through 6-3). Minimum threshold groundwater elevations at six key wells were found to differ by greater than 5-feet from the simulated groundwater elevations in the NNP 3 scenario. These wells are located in the PVPDMA, where~~

~~groundwater production was reduced in the NNP 3 scenario relative to the production in the GSP scenarios. While groundwater production in this area may be reduced in the future, the GSP scenarios, in which groundwater production is higher in this area, were also found to be sustainable. The groundwater elevation minimum thresholds based on these scenarios were found to protect against chronic declines in groundwater levels and significant and unreasonable loss of groundwater in storage in the PVB, and do not impact the ability of the Oxnard Subbasin to meet its sustainability goal.~~ Because there are multiple paths to sustainability, and no current plans to change the management strategy of the PVB ~~based on the updated model scenarios run~~ for this periodic evaluation, no changes are recommended to the minimum thresholds at this time."

p. 103, Measurable Objectives. Revise section as follows:

"~~Consistent with the GSP, the measurable objective groundwater elevations were evaluated by comparing the GSP-defined measurable objective groundwater elevations to the median simulated groundwater elevation after 2040 from the NNP 3 simulation (Figures 6-1 through 6-3). Measurable objective groundwater elevations at six key wells were found to differ by greater than 5-feet from the simulated groundwater elevations in the NNP 3 scenario (Table 6-1). These wells are located in the PVPDMA, where groundwater production was reduced in the NNP3 scenario relative to the production in the GSP scenarios.~~ For the same reasons outlined in section 6.2.1 relative to the minimum thresholds, no changes are recommended to the measurable objectives at this time."

p. 104, Table 6-1. Delete the last column, "Minimum Thresholds and Measurable Objectives."

p. 105, Potential Sustainable Management Criteria with Implementation of EBB, Delete this section.

p. 121, Outreach and Engagement. Next to the last para. Delete the last sentence of this paragraph.

"FCGMA encouraged active participation from interested parties through public workshops (August 30, 2023; April 25, 2024; and September 9, 2024). Additionally, in response to requests from interested parties, the FCGMA Board held a technical workshop focused on baseline and future model scenarios for the Oxnard Subbasin and the PVB on May 30, 2024. This workshop provided interested parties with an opportunity to review the numerical model updates and future model scenarios during the development of this periodic evaluation. Comments made during the technical workshop were used to refine the model scenarios proposed and to develop an additional modeling scenario to evaluate impacts of a geographic redistribution groundwater production on seawater intrusion in the Oxnard Subbasin. ~~The results of the refined model scenarios are presented in Section 5 Updated Numerical Modeling~~."

p. 127, Summary of Proposed or Completed Revisions to Plan Elements. 3rd bullet. Delete this bullet.

"~~Revisions to the estimate of the sustainable yield of PVB that accounts for a range of projects and management actions implemented in the PVB~~."

p. 127, Summary of Proposed or Completed Revisions to Plan Elements, Last para. Revise this paragraph as follows:

"The key takeaway from this first Periodic Evaluation is the additional insight gained into potential pathways to sustainability in the PVB and adjacent Oxnard Subbasin. These insights were gained from the preliminary analysis of the numerical groundwater modeling (to be reported in a future GSP Evaluation Report) that incorporates~~d~~ potential projects and management actions that were not contemplated in the GSP. The expanded suite of projects solicited by FCGMA and advanced by interested parties have provided FCGMA and interested parties with the potential for expanded operational flexibility and new pathways to reach the sustainability goal of the PVB. FCGMA and interested parties also identified additional work to be done between 2025 and 2030 to further improve the understanding and management of the PVB before the second Periodic Evaluation. The suggestions provided by interested parties and technical experts will be incorporated into a document that can be used to guide funding decisions during FCGMA's annual budget process. Through an integrated planning and budgeting process that facilitates GSP implementation, FCGMA will continue to advance sustainable management of the PVB over the upcoming years, in order to reach sustainable management by 2040."

pgs. A-13 through A-20, Appendix A, Comments on the Draft Periodic Evaluation. Revise table as follows:

In the "Commentor" column, please replace "~~Norman Huff~~" with "CWD" or "Camrosa Water District"

Attachment 2

Response to Dudek's October 23, 2024, Presentation at the Fox Canyon Groundwater Management Agency Board Meeting Regarding Pleasant Valley Basin Pumping Effect on Seawater Intrusion in the Oxnard Subbasin

Dudek suggested that groundwater flow from the Oxnard Subbasin (OxB) to the Pleasant Valley Basin (PVB) contributes to seawater intrusion in the OxB. Hydrographs, one each from a well in the OxB and a well in the PVB were overlain to compare groundwater levels in each basin, with the inference that when the PVB groundwater level is higher than OxB groundwater level, then flow is from the PVB to the OxB and vice versa, when OxB groundwater level is higher than PVB groundwater level, then flow is from the OxB to the PVB. In our view, this presentation was a disingenuous attempt to rebut our comment that there is no evidence showing that PVB pumping has contributed to seawater intrusion. Herein we further present our basis for our comment that pumping in the PVB does not significantly contribute to seawater intrusion in the OxB and this reality should be reflected in the GSP Evaluation.

Two Points Do Not Define a Hydraulic Gradient Between Basins

Dudek used two wells to infer the direction of groundwater flow between the OxB and PVB. This is technically incorrect. Use of two wells provides only an apparent hydraulic gradient, direction of flow between the two wells, and not a net direction and magnitude of a hydraulic gradient between the OxB and PVB. United Water Conservation District's Coastal Model (Coastal Model) was constructed to assess groundwater flow in and between groundwater basins in the Fox Canyon Groundwater Management Agency's (GMA) area. It is not clear why Dudek did not present groundwater flow between the two basins based on the Coastal Model, as they used the results of this model for all the GSP Evaluation analyses. Results from the Coastal model show that the net groundwater flow between the two basins is from the PVB to the OxB, which is true for simulation of historical conditions and all scenario simulations. Figure 1 shows net cumulative groundwater flow from the combined Upper Aquifer System (UAS) and Lower Aquifer System (LAS) over the historical 1985 to 2022 period. As shown in Figure 1, over 80,000 acre feet (AF) of groundwater have been contributed to the UAS_LAS of the OxB in this historical period. Figure 2 shows total net cumulative groundwater flow from the PVB to the OxB over the same period, which exceeds 200,000 AF.

Pumping In OxB LAS Results In Substantial Drawdown, Including Along The OxB/PVB Boundary

Comparison of two scenarios, Baseline and NNP2 (No New Projects 2) analyzed in the GSP Evaluation provide insights to the contributions to seawater intrusion in the OxB relative to pumping in each basin. The Baseline scenario projects pumping in each basin based on the assumption that pumping would continue around the 2016-2022 average pumping, with ongoing groundwater/surface water conjunctive use operations of the PTP and PVP systems, which results in highly variable pumping to meet agricultural demands in both basins. The NNP2 scenario assumes that pumping of the LAS in the OxB is reduced 100% (however model files show pumping is not totally eliminated and is closer to 90%). Pumping in the PVB is assumed to not be reduced in any way compared to the Baseline scenario. Comparison of groundwater levels at the boundary of the two basins for each of these scenarios shows how groundwater levels are affected by pumping in both basins. We make this comparison for well 02N21W04K03S, which is located about midway along the boundary between the two basins as shown in Figure 3.

The distribution of pumping in all aquifers on either side of the boundary between the two basins for the Baseline scenario is illustrated in Figure 4 based on average pumping over the period 2015-2017 (we do not have the 2016-2022 data, but we expect the pattern is similar). Pumping in the OxB, approximately between the boundary and Pacific Ocean averages 32,955 AFY. Pumping in the western PVB, which is exclusively agricultural pumping, averages 12,967 AFY. OxB pumping is 2.6 times greater than PVB pumping.

Figure 5 shows simulated groundwater levels in well 02N21W04K01S of the LAS (as represented by Layer 9 of the Coastal Model) for both the Baseline and NNP2 scenarios. In the NNP2 scenario, Figure 5 shows groundwater levels rising as pumping in OxB is reduced by 2040, then groundwater levels remain mostly above sea level for the remainder of the simulation. For the Baseline scenario, groundwater levels are below sea level for the duration of the simulation period.

Figure 6 shows the additional drawdown at 02N21W04K01S created by pumping in the OxB, which is the difference between simulated groundwater levels in the NNP2 scenario and Baseline scenario. Given the NNP2 scenario has nearly eliminated pumping in the LAS in the OxB, the difference in simulated groundwater levels show the impacts of the added pumping in the OxB on groundwater levels at 02N21W04K01S. The impact ranges up to over 75 feet during dry conditions as shown for the period 2040 to 2055.

Seawater Intrusion Is Closely Correlated to Pumping In the Oxnard Subbasin

Seawater intrusion is closely correlated to pumping in the OxB. The NNP2 scenario clearly shows that pumping in the OxB controls seawater intrusion and that pumping in the PVB does not appear to have any effect on the magnitude of seawater intrusion, based on this scenario. Figure 7 shows a correlation of seawater intrusion to pumping in OxB. As pumping in the LAS is reduced, the seawater intrusion rate falls correspondingly (although the falling rate is also substantially affected by high recharge rates in the first decade or so of the simulation). Between 2040 and 2069, pumping in the LAS is reduced to an average of about 2,600 AFY and seawater intrusion in the LAS averages about 250 AFY. The increases and decreases in seawater intrusion rates in this period closely correspond to increases and decreases in pumping in OxB.

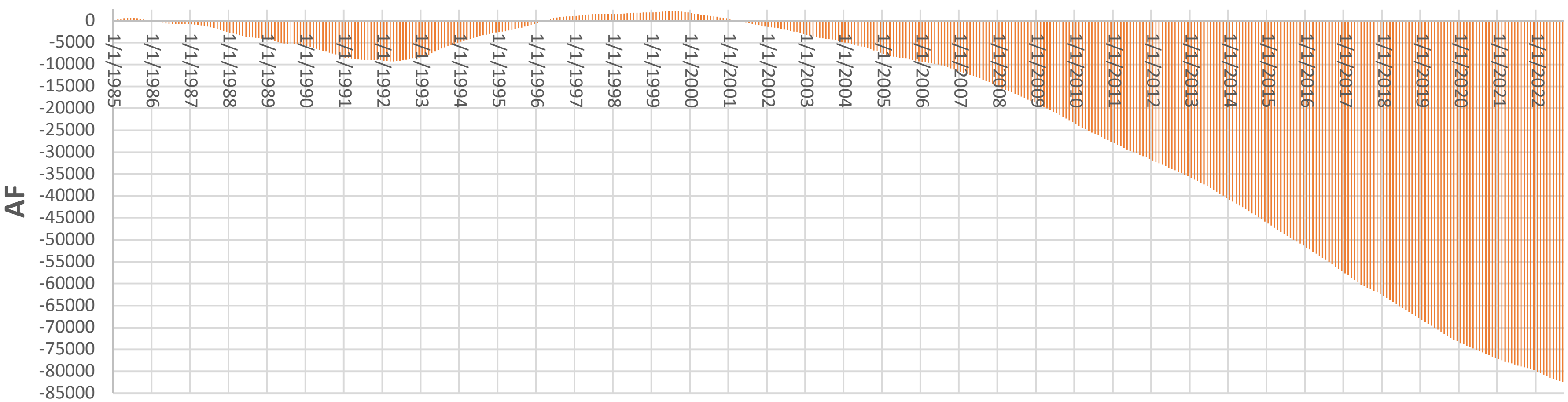
Figure 8 is similar to Figure 7 but now includes pumping from the LAS in the PVB for comparison. Pumping in PVB has no effect on seawater intrusion rates over the simulation period. From 2027 to 2048, pumping in the PVB is steady to slightly increasing, so all the reduction in seawater intrusion is tied to the decrease in pumping in OxB (and the increases in recharge as indicated above). In 2048, when pumping in the LAS is substantially decreased as a result of the drop off of the North Pleasant Valley Desalter pumping, there is no effect on the rate of seawater intrusion. After 2048, pumping in PVB is again relatively steady, and seawater intrusion changes with changes in OxB LAS pumping (and increases in OxB recharge in the later part of the period).

Conclusion

Dudek's rebuttal to our (and possibly others') comments that suggest that pumping in the PVB hasn't significantly affected seawater intrusion in the OxB is disingenuous and ignores the preponderance of available evidence, including many simulation results from UWCD's Coastal Model, which they rely on extensively for other GSP evaluation conclusions. The PVB and OxB are continuous across the Oxnard Plain and there is potential for pumping in the PVB to affect seawater intrusion in the OxB. However, as we have shown, pumping in the PVB is not a likely contributor to seawater intrusion in the OxB. The PVB has contributed significant groundwater flow to the OxB through the historical period (1985-2022) and is expected to continue to do so in the future. In fact, as pumping exchange programs are implemented and more pumping is moved to the northern parts of the basin, for example, as a result of projects like the Conejo Creek Project program under Resolution 2014-01, the potential for pumping in the PVB to affect seawater intrusion in the OxB is reduced even further.

Figure 1.

UWCD Calibrated Model UAS+LAS Cumulative Flows From PVB to Oxnard Subbasin



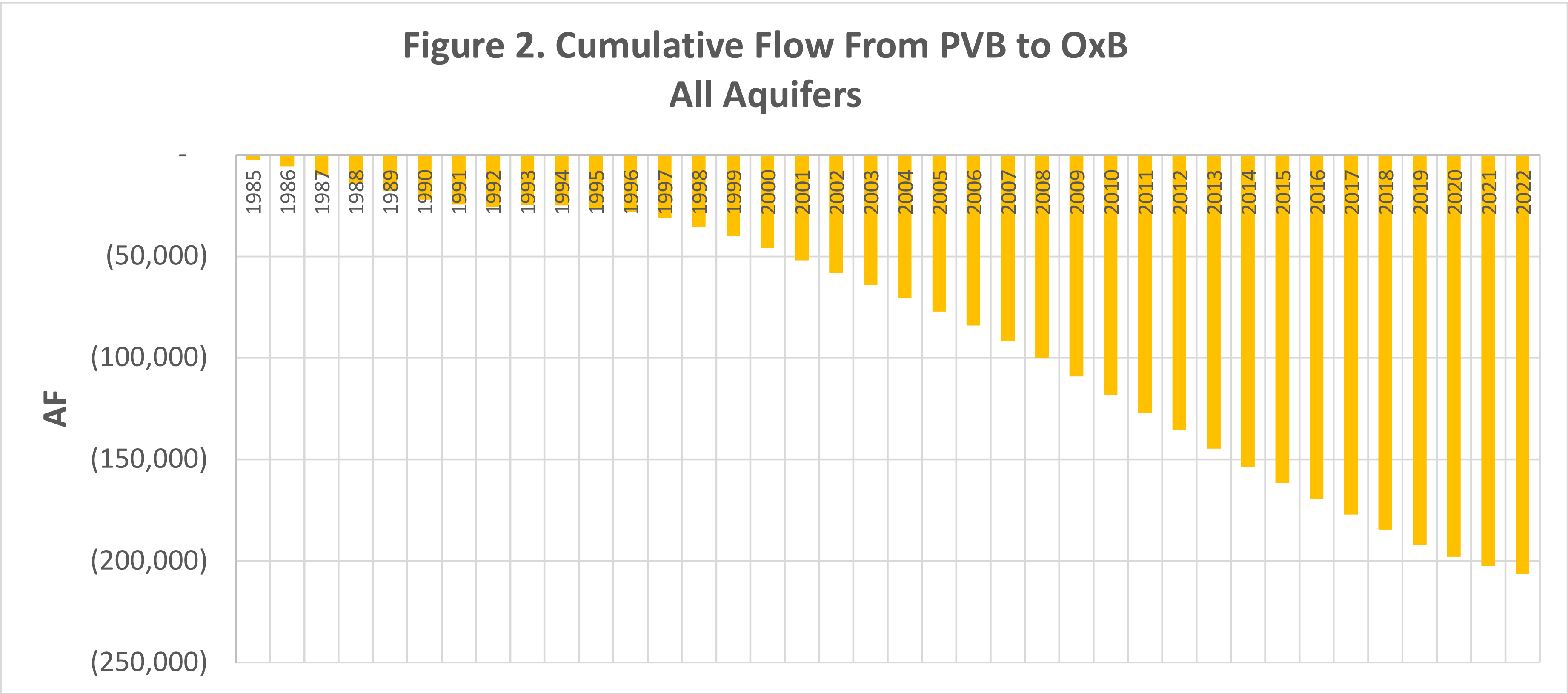


Figure 2. Cumulative Flow From PVB to OxB
All Aquifers
AF
-
(50,000)
(100,000)
(150,000)
(200,000)
(250,000)
1985
1986
1987
1988
1989
1990
1991
1992
1993
1994
1995
1996
1997
1998
1999
2000
2001
2002
2003
2004
2005
2006
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2008
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2011
2012
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2014
2015
2016
2017
2018
2019
2020
2021
2022

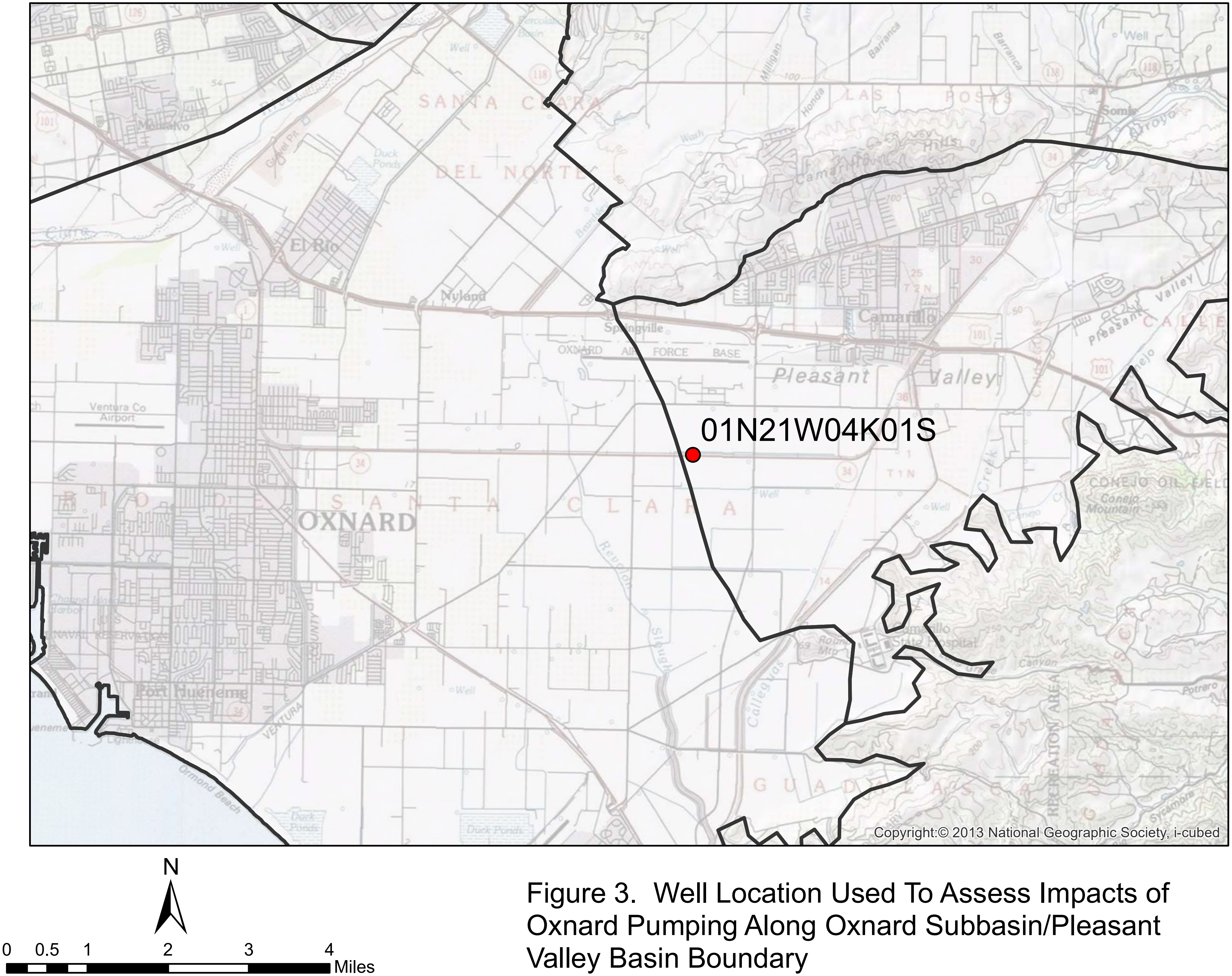

Figure 3. Well Location Used To Assess Impacts of Oxnard Pumping Along Oxnard Subbasin/Pleasant Valley Basin Boundary

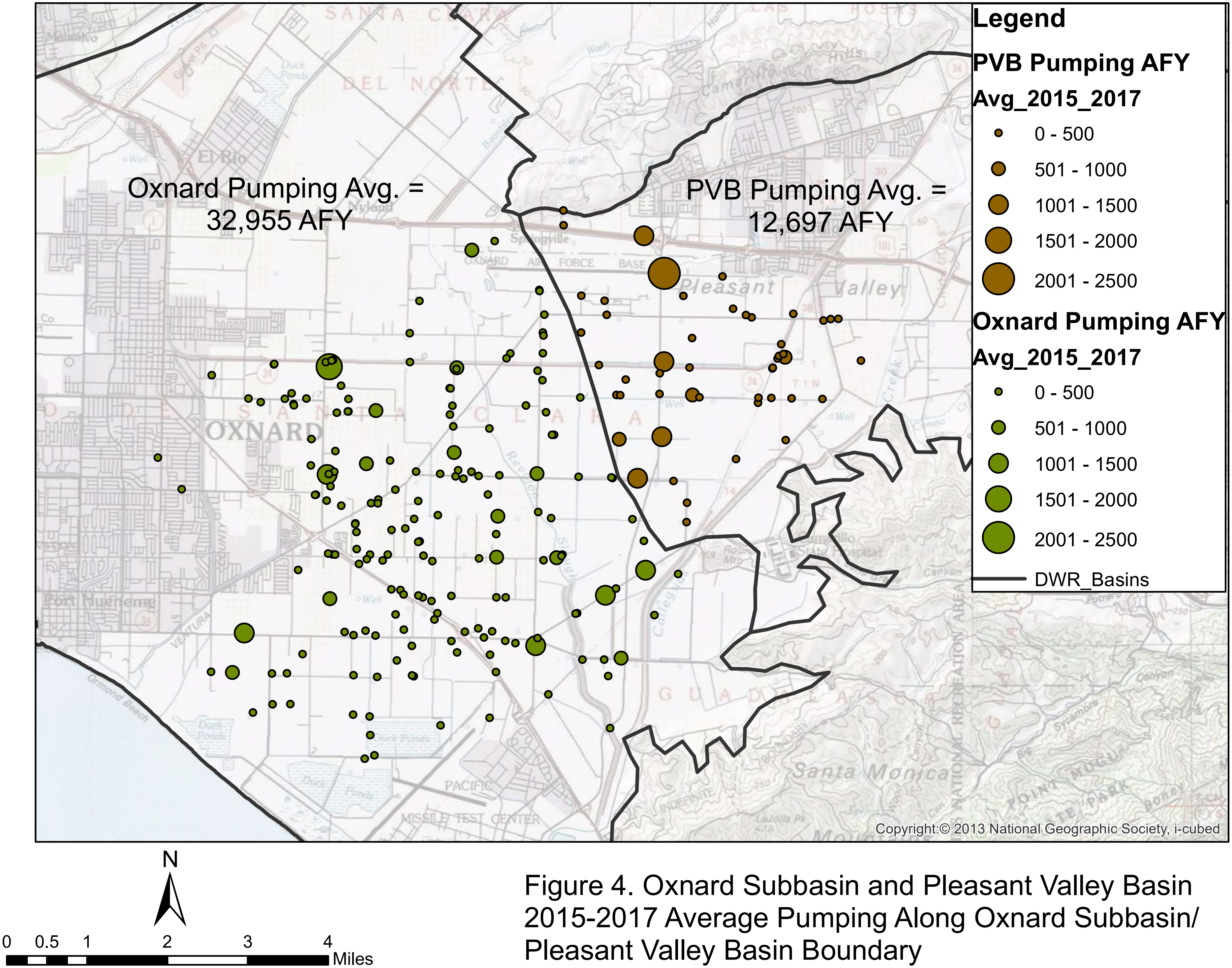

Figure 4. Oxnard Subbasin and Pleasant Valley Basin 2015-2017 Average Pumping Along Oxnard Subbasin/ Pleasant Valley Basin Boundary

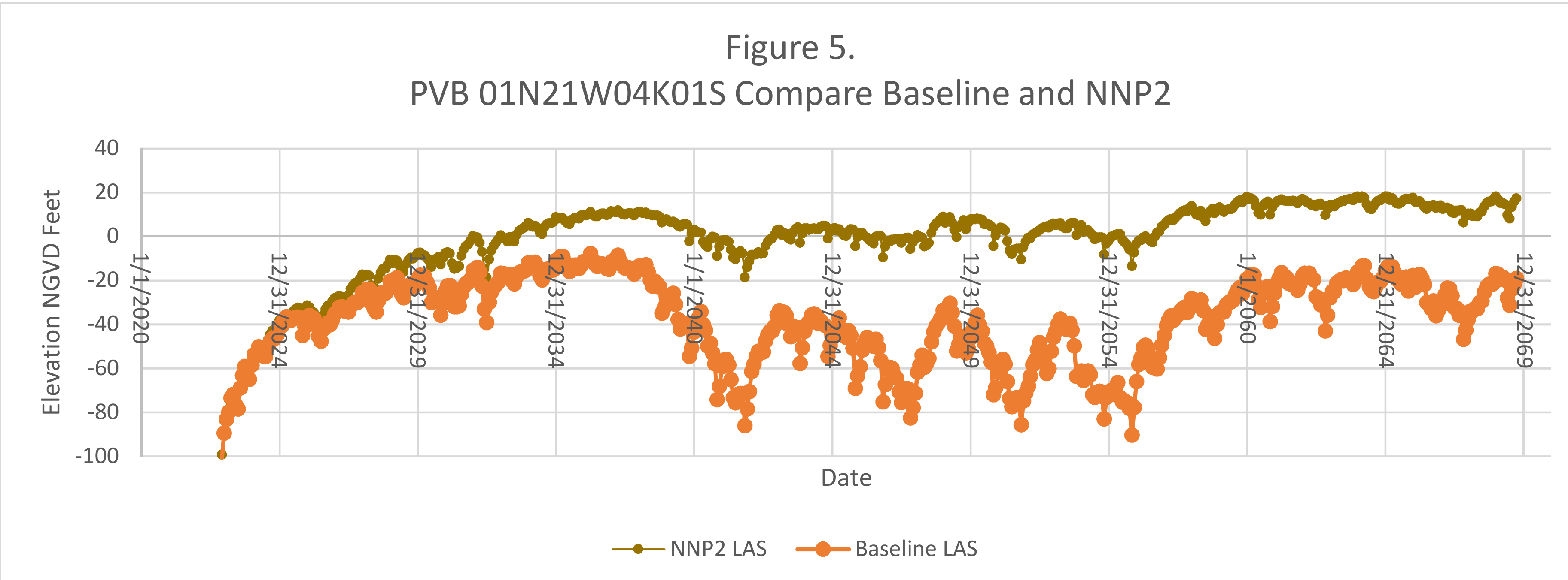
Figure 5.
PVB 01N21W04K01S Compare Baseline and NNP2
40
20
0
-20
-40
-60
-80
-100
Elevation NGVD Feet
1/1/2020
12/31/2024
12/31/2029
12/31/2034
1/1/2040
12/31/2044
12/31/2049
12/31/2054
1/1/2060
12/31/2064
12/31/2069
Date
NNP2 LAS
Baseline LAS

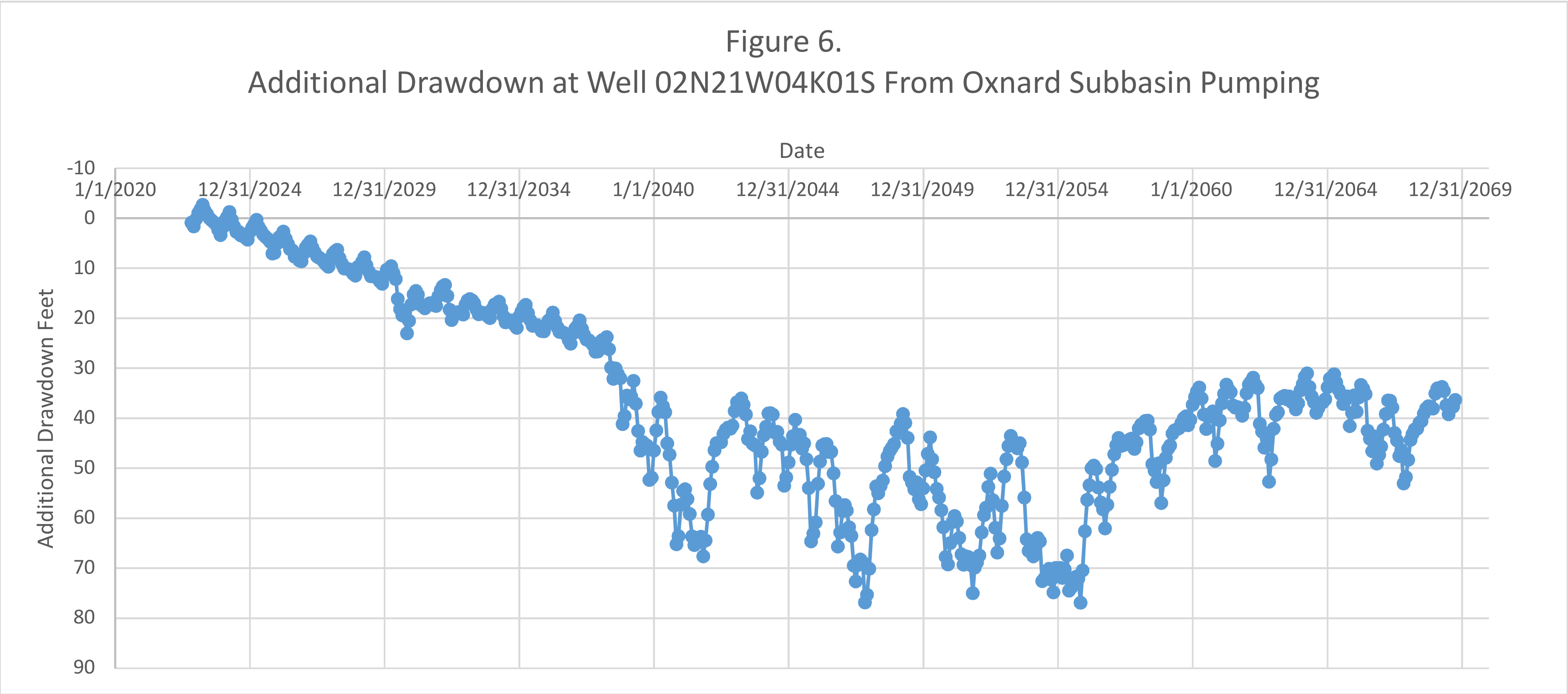
Figure 6.
Additional Drawdown at Well 02N21W04K01S From Oxnard Subbasin Pumping
Date
Additional Drawdown Feet
-10
0
10
20
30
40
50
60
70
80
90
1/1/2020
12/31/2024
12/31/2029
12/31/2034
1/1/2040
12/31/2044
12/31/2049
12/31/2054
1/1/2060
12/31/2064
12/31/2069

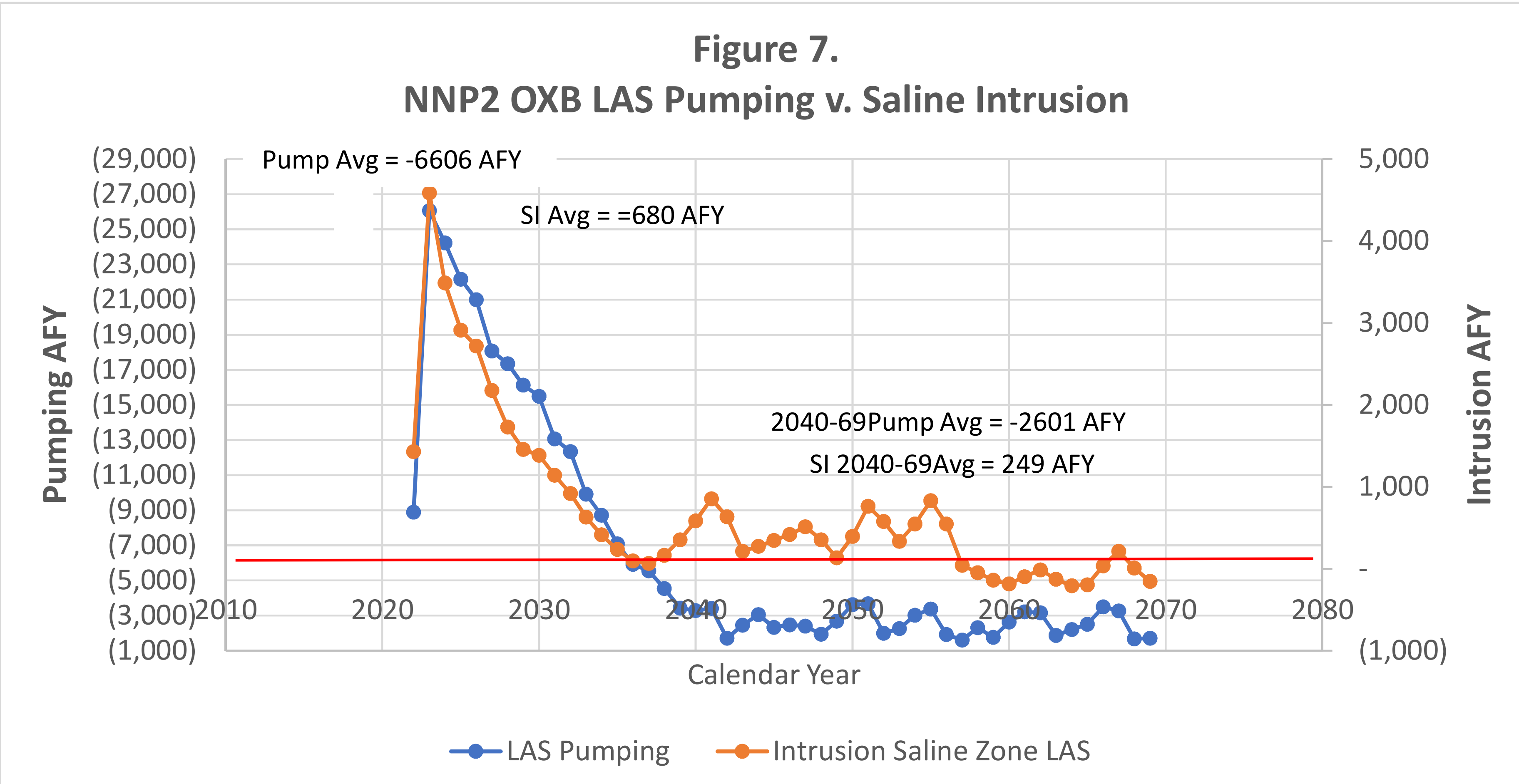
Figure 7.
NNP2 OXB LAS Pumping v. Saline Intrusion
Pump Avg = -6606 AFY
SI Avg = =680 AFY
2040-69Pump Avg = -2601 AFY
SI 2040-69Avg = 249 AFY
Pumping AFY
Intrusion AFY
Calendar Year
(29,000)
(27,000)
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LAS Pumping
Intrusion Saline Zone LAS

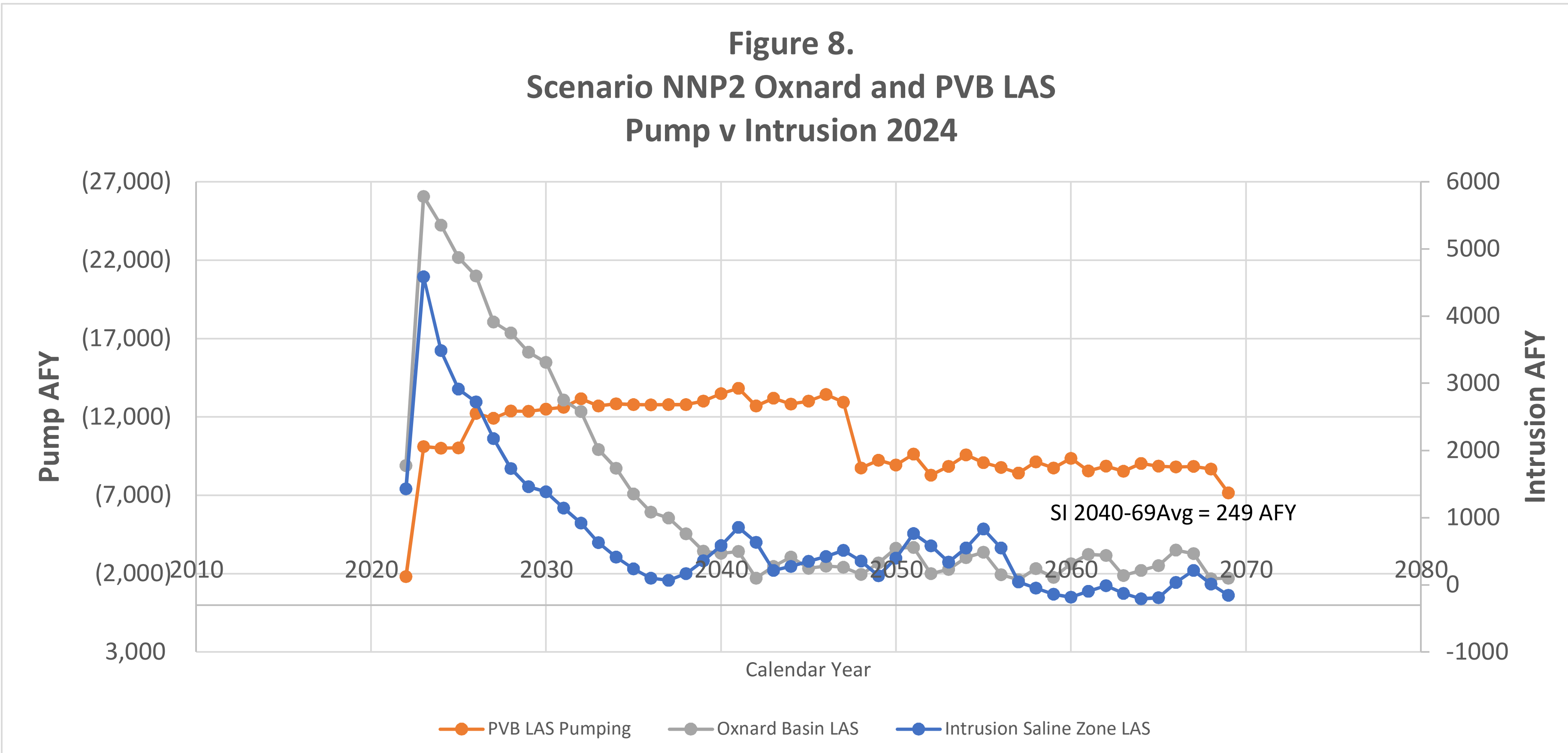
Figure 8.
Scenario NNP2 Oxnard and PVB LAS
Pump v Intrusion 2024
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SI 2040-69Avg = 249 AFY
Calendar Year
PVB LAS Pumping
Oxnard Basin LAS
Intrusion Saline Zone LAS

City of Camarillo
601 Carmen Drive • Camarillo, CA 93010

Office of the City Manager
(805) 388-5307
FAX (805) 388-5318

December 12, 2024

Arne Anselm, Interim Executive Officer
Fox Canyon Groundwater Management Agency
800 South Victoria Ave., No. 1600
Ventura, CA 93009

Submitted via email to:
arne.anselm@ventura.org
FCGMA@ventura.org

RE: Comments on 5-Year GSP Evaluation Document dated December 2024

Dear Mr. Anselm:

Thank you for receiving our prior comments in the letter dated October 7, 2024, and responding to our comments in Appendix A of the revised GSP Evaluation.

In reviewing the revised GSP Evaluation, the City has remaining comments that need to be addressed as noted below.

On Page A-8 of Appendix A, the revised GSP Evaluation includes the response below to the City's comment related to how the City's Desalter is described in the GSP Evaluation compared to what is described in the FCGMA Resolution 2016-04:

> "FCGMA recognizes the important role of the City of Camarillo's North Pleasant Valley Groundwater Desalter facility in removing and treating brackish groundwater that historically entered the basin from the adjacent Las Posas Valley Basin. However, Resolution 2016-04 recognized the potential that pumping from Desalter extraction wells could reduce groundwater levels such that seawater intrusion in the adjacent Oxnard Subbasin could be exacerbated, subsidence could be induced, or a significant and unreasonable loss of fresh groundwater in storage could occur. The Resolution included a Monitoring and Contingency Plan that included groundwater pumping reduction triggers based on measured static groundwater elevation in northern Pleasant Valley wells. The GSP evaluation is consistent with these findings. The GSP evaluation does not recommend changing the minimum threshold or measurable objective in the vicinity of the desalter facility."

The City disagrees with this response as FCGMA Resolution 2016-04 does not include the items noted in the 2nd sentence of the response. In particular, that sentence does not reflect the important details involved in the technical analysis of the relationship, if any, between the City's use of the Desalter at the extreme northeastern boundary of the North Pleasant Valley groundwater basin and seawater intrusion many miles away at the coast, any subsidence anywhere in the area or the loss of groundwater storage that is primarily associated with historical overdraft that preceded the City's Desalter by decades. It is inconsistent with SGMA's requirements of robust technical analysis for FCGMA to just generally state that the City's Desalter is contributing to those problems. Furthermore, FCGMA's response to the City's comment ignores the important *water quality* role that the City's Desalter serves. As FCGMA well knows, the Los Angeles Regional Water Quality Control Board has directed that brackish groundwater in the area be addressed. The City's Desalter is the primary means for doing so. FCGMA apparently would prefer to ignore this fact and the important water quality benefits that the City's Desalter is providing for the region based on generalized statements about the effect of the pumping of the City's Desalter on groundwater conditions as far away as the coast. That is inconsistent with SGMA's fundamental concept that groundwater analysis needs to be robust and reflect real groundwater conditions.

Additionally, the GSP Evaluation is not consistent with Resolution 2016-04 as the GSP Evaluation doesn't include language from the Resolution 2016-04 that clarifies the purpose of the City's Desalter project, which is stated on page 1 of Resolution 2016-04 as: "The Desalter Project will have a 25-Year life expectancy, after which it is anticipated that groundwater levels in the Pleasant Valley groundwater basin will be at conditions prior to the brackish water entering the basin, and will be allowed to recover to sustainable conditions."

The GSP Evaluation document continues to include evaluations of Minimum Thresholds and groundwater elevations of nearby wells to the Desalter as a measure of groundwater quality in the North Pleasant Valley groundwater basin without adequately addressing how the Desalter will operate per FCGMA Resolution 2016-04.

Enclosed are requested changes to the GSP Evaluation to address these comments.

Sincerely,

Greg Ramirez
City Manager

Enclosed: Requested Changes to Section 2.2.4.1 DWR Recommended Correction Actions

Requested changes to Section 2.2.4.1 – DWR Recommended Correction Actions (labeled as p.27, also 49th page of PDF document).

The City of Camarillo, in coordination with FCGMA, is in the process of developing a revised Monitoring and Contingency Plan (MCP) to establish groundwater elevation of nearby project wells as the primary measure of assessing potential seawater intrusion impacts. Monitoring data indicate that groundwater elevation at well 02N20W19M05S has not dropped below -11.5 ft. msl. The current GSP minimum threshold groundwater elevation at well 02N20W19M05S of -135 ft msl is designed to accommodate the operation of the NPV Groundwater Desalter Project; however the FCGMA Resolution 2016-04 and accompanying MCP was established primarily to address water quality concerns in the NPVMA with thresholds established to reduce groundwater levels to prior to when brackish water entered the basin, then allowing the basin to recover . The operation of the Desalter may bring groundwater levels in the project area below the GSP minimum threshold at well 02N20W19M05S temporarily while addressing groundwater quality concerns. ~~This threshold is appropriate to assess undesirable results associated with degraded water quality in this part of the PVB.~~ FCGMA is committed to adaptive management and encouraging beneficial projects that address water quality degradation in the basin and enable beneficial uses of local water supplies. Groundwater level and quality conditions in the NPVMA will continue to be monitored in coordination with the City of Camarillo through implementation of the NPV Groundwater Desalter project.

Item 9. FCGMA Budget to Actual Report for January 2025

FUND: O170 UNIT: 5795

		OBJ	PROGRAM	TOTAL	EXPENDITURES BY ACCOUNTING PERIOD												
					AP 01/ July	AP 02/ August	AP 03/ September	AP 04/ October	AP 05/ November	AP 06/ December	AP 07/ January	AP 08/ February	AP 09/ March	AP 10/ April	AP 11/ May	AP 12/ June	AP 13
1	**CASH BALANCE 07-01-24**			**6,988,697.31**	6,988,697.31	7,779,349.81	6,644,333.02	5,493,290.11	5,213,793.63	4,034,911.42	3,653,443.78	6,108,135.23	6,108,135.23	6,108,135.23	6,108,135.23	6,108,135.23	6,108,135.23
2	**REVENUE:**																
3	PUMP CHARGES	9790	P6020901	297,470.21	123,574.42	16,147.94	25,446.70	52,388.37	31,042.51	8,667.97	40,202.30						
4	SURCHARGES	9790	P6020903	43,631.11	34,464.25						9,166.86						
5	INTEREST/ PENALTIES	9790	P6020904	35,582.72	2,624.31	4,151.14	1,550.00		8,433.83	8,100.00	10,723.44						
6	GEMES RESERVE FEE	9790	P6020907	767,123.25	359,428.58	18,816.00	84,781.06	172,664.55	34,904.40	28,893.34	67,635.32						
7	SUSTAINABILITY FEE	9790	P6020908	1,079,831.33	492,364.19	27,714.27	122,932.79	253,189.35	48,025.45	41,895.34	93,709.94						
8	FCGMA TECH SERVICES -GRANT	9708	P6020852	46,472.00			46,472.00										
9	INTEREST EARNINGS	8911	-	40,103.81	(88,564.50)		44,282.25		44,282.25		40,103.81						
10	GRANT REVENUE	9790	P6020872/6020874	2,541,830.03							2,541,830.03						
11	OTHER REV	9790	-	0.00													
12	**TOTAL REVENUE**			**4,852,044.46**	**923,891.25**	**66,829.35**	**325,464.80**	**478,242.27**	**166,688.44**	**87,556.65**	**2,803,371.70**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**
13	TOTAL FUNDS AVAILABLE			11,840,741.77	7,912,588.56	7,846,179.16	6,969,797.82	5,971,532.38	5,380,482.07	4,122,468.07	6,456,815.48	6,108,135.23	6,108,135.23	6,108,135.23	6,108,135.23	6,108,135.23	6,108,135.23
14	**EXPENDITURES:**																
15	***SUPPORT***																
16	PUBLIC WORKS CHARGES	2205	-	1,366,089.45	121,253.89	205,268.99	182,529.79	211,276.59	332,417.44	184,744.02	128,598.73						
17	MANAGEMENT AND ADMIN SURVEY ISF	2199	P6020901	237,900.00				118,950.00		118,950.00							
18	FCGMA ONLINE SUPPORT	2202	P6020850	54,841.95		11,666.00	3,989.00	5,663.17	13,080.99	10,140.69	10,302.10						
19	BOARD MEMBERS INSURANCE	2072	P6020850	4,085.00	4,085.00												
20	BI-ANNUAL AUDIT	2199	P6020850	4,950.00			4,950.00										
21	WPD -SCR Coordinator	2199	P6020850	0.00													
22	***CONTRACT***																
23	CONSULTANT CONTRACT (DUDEK) - Implementation	2183	P6020858	583,230.29			122,414.64	108,002.39	189,199.93		163,613.33						
24	CONSULTANT CONTRACT (DUDEK) - Annual reports	2183	P6020858	42,187.50					7,835.00		34,352.50						
25	CONSULTING CONTRACT (UNITED WATER)-GSP modeling	2183	P6020858	0.00													
26	CONSULTING CONTRACT (RINCON CONSULTANT)- AMI Data support	2199	P6020852/70	36,627.04	4,355.21	5,920.79	2,365.11	7,814.89	4,311.52	2,208.15	9,651.37						
27	CONSULTING CONTRACT (HALLMARK)	2199	P6020850	8,879.31				5,164.34		3,714.97							
28	CONSULTING CONTRACT (PADRE ASSOCIATES)	2183	P6020872/74	3,795.00				1,897.50		1,897.50							
29	***LEGAL***																
30	COUNTY COUNSEL	2185	P6020850	0.00													
31	COUNTY COUNSEL	2185	P6020853	47,775.00			11,534.25	23,955.75		12,285.00							
32	COUNTY COUNSEL (GEMES) - LPV Basin Adjudication	2185	P6020864	6,415.50			2,934.75	2,320.50		1,160.25							
33	COUNTY COUNSEL (GEMES) - City of Oxnard v FCGMA	2185	P6020866	5,050.50			819.00	1,365.00		2,866.50							
34	COUNTY COUNSEL (GEMES) - OPV Coalition v FCGMA	2185	P6020867	26,958.75			8,531.25	11,943.75		6,483.75							
35	OTHER LEGAL FEES (Jarvis Fay)	2185	P6020850	1,976.00				1,976.00									
36	OTHER LEGAL FEES (Rutan & Tucker LLP)	2185	P6020853	11,573.50		11,573.50											
37	OTHER LEGAL FEES (Stoel)(GEMES) - LPV Basin Adjudication	2185	P6020864	241,683.28		8,134.20	26,165.00	94,508.48			112,875.60						
38	OTHER LEGAL FEES (Stoel)(GEMES) - City of Oxnard v FCGMA	2185	P6020866	248,136.88		44,163.52	70,954.51	78,846.71			54,172.14						
39	OTHER LEGAL FEES (Stoel)(GEMES) - OPV Coalition v FCGMA	2185	P6020867	0.00													
40	OTHER LEGAL FEES (Stute Mihaly)(GEMES) - OPV Coalition v FCGMA	2185	P6020867	327,300.88		104,254.96	33,207.96	50,591.53	47,164.56	58,177.77	33,904.10						
41	LEGAL EXPENSE COST SHARE - LPV WATERMASTER	2185	P6020853	(200,000.00)							(200,000.00)						
42	***GRANT***																
43	KENNEDY JENKS	2199	P6020852	64,560.00		6,492.50	9,452.50	29,867.50		18,747.50							
44	WILDHERON DRILLING - FOX24-01 OXNARD BASIN MONIT WELLS	4114	P6020872	1,294,585.28		401,925.86	494,794.82		374,121.88	23,742.72							
45	WILDHERON DRILLING - FOX24-01 PV BASIN MONIT WELLS	4114	P6020874	1,294,585.24		401,925.85	494,794.80		374,121.87	23,742.72							
46	***GSA CHARGES***																
47	GIS - ISF	2203	P6020850	1,053.36		300.96	150.48	150.48	150.48	150.48	150.48						
48	SPECIAL SERVCES ISF	2206	P6020850	6,206.48			4,144.84		1,853.32		208.32						
49	OTHER MAINTENANCE ISF	2116	P6020850	833.28				833.28									
50	VOICE DATA ISF	2032	P6020850	36.81					12.27	12.27	12.27						
51	MAIL CENTER ISF	2164	P6020850	3.61							3.61						
52	***SPECIAL***																
53	LAFCO FUNDING	2159	P6020850	3,510.00	3,510.00												
54	OXNARD WELL DESTRUCTION	2199	P6020854	0.00													
55	FRUIT GROWERS LAB - Annual GW Monit - Oxnard/ PV Basin Monit Wells	2199	P6020872/74	4,895.00			2,612.00	1,306.00	977.00								
56	***OTHER***																
57	PUBLIC NOTICE	2221	various	855.07				855.07									
58	CONFERENCES / SEMINARS	2273	P6020850	0.00													
59	PRINTING AND BINDING NON ISF	2162	P6020872/74	0.00													
60	HYDROLOGY SUPPLIES	2103	P6020852	0.00													
61	MAINTENANCE SUPPLIES AND PARTS	2104	P6020872	286.81				286.81									
62	SOFTWARE SUBSCRIPTIONS NON ISF (ZOOM)	2236	P6020850	977.83		163.01	163.01	163.01	163.01		325.79						
63	MISC OFFICE EXPENSE	2169/79	P6020850	431.94	34.65	56.00			161.38		179.91						
64	ASSN OF WATER AGENCIES	2159	P6020850	330.00							330.00						
65	**TOTAL EXPENDITURES**			**5,732,606.54**	**133,238.75**	**1,201,846.14**	**1,476,507.71**	**757,738.75**	**1,345,570.65**	**469,024.29**	**348,680.25**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

	Item 9. FCGMA Budget to Actual Report for January 2025																
	FUND: O170 UNIT: 5795				EXPENDITURES BY ACCOUNTING PERIOD												
		OBJ	PROGRAM	TOTAL	AP 01/ July	AP 02/ August	AP 03/ September	AP 04/ October	AP 05/ November	AP 06/ December	AP 07/ January	AP 08/ February	AP 09/ March	AP 10/ April	AP 11/ May	AP 12/ June	AP 13
66																	
67																	
68	TOTAL REVENUE			4,852,044.46	923,891.25	66,829.35	325,464.80	478,242.27	166,688.44	87,556.65	2,803,371.70	0.00	0.00	0.00	0.00	0.00	0.00
69	CONTINGENCY			0.00													
70	**ENDING CASH BALANCE**			**6,108,135.23**	**7,779,349.81**	**6,644,333.02**	**5,493,290.11**	**5,213,793.63**	**4,034,911.42**	**3,653,443.78**	**6,108,135.23**	**6,108,135.23**	**6,108,135.23**	**6,108,135.23**	**6,108,135.23**	**6,108,135.23**	**6,108,135.23**

NOTES:

•Revenues from charges and fees increased $133,881.21 (153%) in January (AP07) from December (AP06). Due to the SAES reporting 2024-2 due date of February 03, 2025, significant increases were seen from Pumping Charges, Surcharges, Penalties, GEMES Reserve fees and Sustainability fees collected.

•Interest earnings from County Pooled Investment fund decreased by 9% compared to November (AP05). December saw no interest earnings allocation.

•SGM Grant Program reimbursement received in January: PV Basin was reimbursed $1,457,500.00 and Oxnard Subbasin $1,084,330.03, for a total of $2,541,830.03.

•Expenses decreased by $120,344.04 (26%) in January (AP07) as the County Counsel legal invoices for November and December did not process this month. The final invoice from Wildherron Drilling, LLC for $136,250.97 will be processed for payment in February.

•As per Board approval, $200,000 legal expense cost share was transferred to LPV Watermaster.

Item 10 - LPV Watermaster Budget to Actual Report for January 2025

FUND: O171 UNIT: 5796	2024-25	ACCUMULATED			EXPENDITURES BY ACCOUNTING PERIOD												
LPV WATERMASTER	ADOPTED	OBJ	PROG	TOTAL	AP 01	AP 02	AP 03	AP 04	AP 05	AP 06	AP 07	AP 08	AP 09	AP 10	AP 11	AP 12	AP 13
	BUDGET				7/23	8/23	9/23	10/23	11/23	12/23	1/24	2/24	3/24	4/24	5/24	6/24	7/24
CASH BALANCE				**1,127,504.76**	1,127,504.76	1,050,837.78	1,076,742.91	1,074,025.08	1,386,410.44	1,412,842.35	1,438,769.91	1,630,339.40	1,630,339.40	1,630,339.40	1,630,339.40	1,630,339.40	1,630,339.40
REVENUE:																	
INTEREST EARNINGS		8911	-	6,167.29	(9,651.42)		4,825.71		4,825.71		6,167.29						
BASIN ASSESSMENT FEE		9790	P6020670	972,176.68	(54,626.98)	38,593.60	15,837.76	403,185.65	85,301.81	70,356.86	413,527.98						
BASIN ASSESSMENT INTEREST		9790	P6020671	16,282.53	2,102.43	2,775.68	2,584.16	112.55		1,232.84	7,474.87						
TOTAL REVENUE				**994,626.50**	**(62,175.97)**	**41,369.28**	**23,247.63**	**403,298.20**	**90,127.52**	**71,589.70**	**427,170.14**	**-**	**-**	**-**	**-**	**-**	**-**
TOTAL FUNDS AVAILABLE				2,122,131.26	1,065,328.79	1,092,207.06	1,099,990.54	1,477,323.28	1,476,537.96	1,484,432.05	1,865,940.05	1,630,339.40	1,630,339.40	1,630,339.40	1,630,339.40	1,630,339.40	1,630,339.40
EXPENDITURES:																	
SUPPORT:																	
PUBLIC WORKS ISF CHARGES - LPV WATERMASTER ADMINISTRATION	106,848	2205	P6020660	77,420.64	14,491.01	5,228.90	1,925.09	7,698.49	26,921.33	8,029.70	13,126.12						
PUBLIC WORKS ISF CHARGES - LPV ALLOCATIONS & RECORD KEEPING	257,792	2205	P6020661	16,707.69		1,535.70	332.74	3,187.43	8,854.35	2,797.47							
PUBLIC WORKS ISF CHARGES - LPV BASIN MANAGEMENT	156,880	2205	P6020662	20,486.66		1,319.55		3,126.10	6,132.81	3,981.92	5,926.28						
PUBLIC WORKS ISF CHARGES - LPV COMMITTEE COORDINATION AND CONSULT	71,232	2205	P6020663	19,272.05		2,608.50	1,187.44	2,770.72	6,966.06	3,760.25	1,979.08						
PUBLIC WORKS ISF CHARGES - LPV BUDGET & ASSESSMENTS	136,528	2205	P6020664	6,238.24				1,510.97	2,789.73	569.63	1,367.91						
PUBLIC WORKS ISF CHARGES - LPV SERVICE & SUPPORT	200,000	2205	P6020667	14,404.02			79.68	4,727.78	4,605.03	3,085.77	1,905.76						
LPV CALLEGUAS ASR PROJECT OPERATIONS STUDY	81,408	2205	P6020665	-													
LEGAL:																	
LPV LEGAL SERVICES - COUNTY COUNSEL	248,640	2185	P6020666	45,045.00			10,647.00	25,184.25		9,213.75							
LPV LEGAL SERVICES - FCGMA LEGAL COST SHARE		2185	P6020666	200,000.00							200,000.00						
CONTRACTS:																	
RGS AUTHORITY	25,000	2199	P6020660	15,523.81		4,771.50	1,602.26	1,520.35	3,052.30	4,577.40							
TODD GROUNDWATER-TAC	259,200	2199	P6020662	38,613.75			10,191.25	18,152.50		8,853.75	1,416.25						
AQUILOGIC-TAC		2199	P6020662	15,890.00				11,860.00	570.00		3,460.00						
DANIEL B STEPHENS & ASSOCIATES-TAC/PAC	170,000	2199	P6020662	22,190.00				11,174.25	3,804.00	792.50	6,419.25						
TOTAL EXPENDITURES				491,791.86	14,491.01	15,464.15	25,965.46	90,912.84	63,695.61	45,662.14	235,600.65	-	-	-	-	-	-
CONTINGENCY																	
ENDING CASH BALANCE				**1,630,339.40**	**1,050,837.78**	**1,076,742.91**	**1,074,025.08**	**1,386,410.44**	**1,412,842.35**	**1,438,769.91**	**1,630,339.40**	**1,630,339.40**	**1,630,339.40**	**1,630,339.40**	**1,630,339.40**	**1,630,339.40**	**1,630,339.40**

NOTES:

- In January (AP 07), revenue totaled $355,580.44, an increase of 497% from December, largely due to the quarterly 2024-2 Basin Assessment (BA) payments collected before the January 30, 2025, due date for the quarterly BA.
- Interest earnings from the County Pooled Investment fund were higher by 28% compared to November (AP05); December (AP06) saw no interest earnings allocation.
- Expenses increased 416% from December due to the Board-approved $200,000 legal expense cost share transfer to LPV Watermaster, which occurred in January.

FOX CANYON
GROUNDWATER MANAGEMENT AGENCY
A STATE OF CALIFORNIA WATER AGENCY

February 12, 2025

Board of Directors
Fox Canyon Groundwater Management Agency
800 South Victoria Avenue
Ventura, CA 93009-1600

SUBJECT: Appointment of Ventura County Waterworks District Nos. 1 & 19 Representative to the Las Posas Valley Policy Advisory Committee [LPV Watermaster] – *(New Item)*

RECOMMENDATION: Appoint Mr. Jeff Palmer, Assistant Director of the Ventura County Public Works Agency (PWA) to serve as the replacement nominee for Ventura Waterworks Districts 1 &19 (WMIDs 2011, 2191 and 2192) on the Las Posas Valley Watermaster Policy Advisory Committee (PAC).

INTRODUCTION

The Policy Advisory Committee (PAC) is an 11-member advisory body to the Las Posas Valley Basin Watermaster (LPV Watermaster) on policy-related matters of a non-technical nature. The PAC includes: 5 basin wide representatives [Zone Mutual Water Company, Ventura County Waterworks Districts Nos. 1 & 19, Calleguas, Commercial and Watermaster Representative (*non-voting*)] and 6 representatives for the East and West Management Areas (Large Agriculture, Small Agriculture and Mutual Water Companies) (Judgment, § 6.10.2).

Each member of the PAC serves until that member resigns or is replaced according to the Judgment (Judgment, § 6.10.2, Exh. A, § 3.1.6). In the event of a vacancy, the applicable Landowner Constituency nominates a replacement pursuant to the procedure for initial selection set forth in the Judgment. However, Basin wide and Watermaster representatives may select their respective PAC members pursuant to their own internal governance process (Exhibit A, § 3.1.6).

DISCUSSION

Ventura County Waterworks Districts Nos. 1 & 19 (WWD) notified Watermaster that the WWD representative to the PAC, Mr. David Fleisch, was stepping down. At the same time, WWD notified Watermaster of a replacement nominee to the PAC, Mr. Jeff Palmer, pursuant to the WWD's internal governance process, in a letter dated February 4, 2025. This letter is attached as Exhibit 11A. Pursuant to the Judgment, Watermaster shall appoint or decline to appoint a nominee within 60 days of the nomination and shall only decline to appoint a nominee for cause (Judgment, § 6.10.2).

CONCLUSION

Staff recommends that your Board appoint the WWD nominee, Mr. Jeff Palmer, to the Las Posas Valley Policy Advisory Committee as the Ventura Waterworks Districts 1 & 19 representative.

This letter has been reviewed by Agency Counsel. If you have any questions, please call me at (805) 654-3942.

Sincerely,

Kudzai Farai Kaseke (Ph.D., PH, PMP, CSM)
Assistant Groundwater Manager

Attachment:

Exhibit 11A – Ventura County Waterworks Districts 1 & 19 LPV PAC Membership Replacement Letter, dated February 4, 2025.

PUBLIC VENTURA COUNTY WORKS

COUNTY of VENTURA

Gregg Strakaluse
Agency Director

Jeff Palmer
Assistant Director

Central Services
Joan Araujo, Director

Engineering Services
Anastasia Seims, Director

Roads & Transportation
Anitha Balan, Director

Water & Sanitation
Vacant, Director

Watershed Protection
Vacant, Director

February 4, 2025

Gene West, Chair
Fox Canyon Groundwater Management Agency/Las Posas Basin Watermaster
800 S. Victoria Ave.
Ventura, CA 93009

RE: Ventura County Water Works Districts Nos. 1 and 19 Las Posas Valley Policy Advisory Committee Membership Replacement

Chair West:

The Ventura County Water Works Districts Nos. 1 and 19 is party to the Las Posas Valley Water Rights Coalition, et al. v. Fox Canyon Groundwater Management Agency, Santa Barbara Sup. Ct. Case No. VENC100509700 (Judgment) and is assigned a seat on the Policy Advisory Committee (PAC). In accordance with the provisions of the Judgment, Ventura County Water Works Districts Nos. 1 and 19 nominate Jeff Palmer as the replacement nominee for the Ventura County Water Works Districts Nos. 1 and 19 on the PAC. (Judgment, Exh. A, § 3.1.6.)

Ventura County Water Works Districts Nos. 1 and 19 look forward to your approval for appointment of this nomination consistent with section 6.10.2. of the Judgment.

Thank you for your consideration,

G. Stre

Gregg Strakaluse, P.E
Director

Item 12 - Correspondence from Ventura County Clerk of the Board of Supervisors regarding reappointment verification for the Board of Supervisors representative, dated January 17, 2025.

From:	ClerkoftheBoard
To:	Weber, Elka; Anselm, Arne
Subject:	Appointments to the Fox Canyon Groundwater Management Agency Board
Date:	Friday, January 17, 2025 11:49:43 AM
Attachments:	Meeting_Minute_Orders_011425.pdf

Greetings,

Attached is the Minute Order from the **January 14, 2025,** Board of Supervisors meeting verifying the reappointment of **Supervisors Kelly Long and Vianey Lopez** to the **Fox Canyon Groundwater Management Agency Board.** You may access **Fox Canyon Groundwater Management Agency Board's** record details at www.ventura.org/county-executive-office/clerk-of-the-board/boardscommissionscommittees-information/.

Sincerely,

COUNTY of VENTURA
County Executive Office

Clerk of the Board
800 S. Victoria Avenue L#1920
Ventura, CA 93009

Clerk of the Board Staff

O: (805) 654-2251

ventura.org/cob

BOARD MINUTES
BOARD OF SUPERVISORS, COUNTY OF VENTURA, STATE OF CALIFORNIA

SUPERVISORS MATT LAVERE, JEFF GORELL,
KELLY LONG, JANICE S. PARVIN AND VIANEY LOPEZ
January 14, 2025 at 8:30 a.m.

COUNTY EXECUTIVE OFFICE - Review, Discuss, and Make Assignments of Members of the Board of Supervisors to Various Boards, Commissions, and Committees.

(X) All Board members are present.

(X) The following person is heard: Mia Martinez.

(X) Upon motion of Supervisor Long, seconded by Supervisor Gorell, and duly carried, the Board hereby approves assignments as proposed with all assignments for 2024 remaining in place for 2025 with the following additions:
Appoint Jeff Gorell and Kelly Long as Alternates to Beach Erosion Authority for Clean Ocean and Nourishment (BEACON);
Appoint Vianey Lopez to Juvenile Justice Coordinating Council (with Jeff Gorell vacating); and
Appoint Janice S. Parvin as an Alternate to Ventura County Health Care System Oversight Committee.

By: Lori Key
Lori Key
Assistant Chief Deputy Clerk of the Board

Item #39
1/14/25

TO BE PUBLISHED IN THE OFFICIAL REPORTS

OFFICE OF THE ATTORNEY GENERAL
State of California

ROB BONTA
Attorney General

OPINION	:	No. 24-101
of	:	January 22, 2025
ROB BONTA Attorney General	:	
SUSAN DUNCAN LEE Deputy Attorney General	:	

The HONORABLE TIFFANY NORTH, COUNTY COUNSEL FOR THE COUNTY OF VENTURA, has requested an opinion on a question relating to a groundwater management district's statutory hiring power.

QUESTION PRESENTED AND CONCLUSION

The Fox Canyon Groundwater Management Agency was created by the Legislature, as reflected in Water Code Appendix sections 121-102 to 121-1105.[1] Does this statutory scheme allow the Agency to hire its own staff, or to contract with an entity other than the County of Ventura or the United Water Conservation District for staff services?

[1] Many water districts in California have been formed through uncodified legislative acts, which have been collected and maintained for the benefit of the public in the Water Code Appendix. (See Preface, 70C West's Ann. Wat. Code (2010 ed.) p. III; see also Legislative Intent Service, Inc., California Water Code Statutory History, http://www.legintent.com/california-water-code-statutory-history, Sept. 8, 2017 (as of Jan. 22, 2025).)

No. The statutory scheme establishes the Agency's power to contract for staff services, and it limits that power to contracting with the two agencies specified in the statute, which are the County of Ventura and the United Water Conservation District.

BACKGROUND

The Fox Canyon Groundwater Management Agency is a special water agency created by the Legislature in 1982 to manage and conserve groundwater resources for agricultural, municipal, and industrial uses, for the common benefit of all water users.[2] The Agency's formation was prompted by a State Water Board investigation into seawater intrusion beneath the Oxnard Plain Basin in Ventura County. Completed in 1979, the investigation found that seawater intrusion into the Oxnard Plain was affecting 20 square miles of the basin despite continuing local mitigation efforts. To address the seawater intrusion problem, Ventura County and the United Water Conservation District sought and obtained the Legislature's approval to establish the Agency.[3]

To carry out its mission to preserve fresh groundwater resources, the Agency prepares annual work plans, budgets, and management reports; quarterly work plans and budget status reports; and monthly decision items such as ordinances and resolutions.[4] Since its creation, the Agency has relied on contracts with Ventura County for its staffing needs.

ANALYSIS

The Ventura County Counsel has asked for our opinion as to whether Water Code Appendix section 121-408 permits the Agency to hire its own staff, or to contract with an entity other than the County of Ventura or the United Water Conservation District for staff services.

Familiar principles of statutory interpretation guide our consideration of this question. Our primary task in interpreting a statute is to determine the Legislature's

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[2] Stats. 1982, ch. 1023 (Fox Canyon Groundwater Management Agency Act); Wat. Code App., §§ 121-102–121-1105.

[3] The United Water Conservation District is a local agency that conserves and enhances water resources in the Santa Clara River Valley and the Oxnard Plain. (See United Water Conservation District, About Us, https://www.unitedwater.org/about-us (as of Jan. 22, 2025).)

[4] See FCGMA, Brief History Overview (Jan. 2015), p. 3, available at https://fcgma.org/wp-content/uploads/2022/05/FCGMA_History_Edit_PK.pdf (as of Jan. 22, 2025).

intent, so that we can apply the statute in a way that carries out its intended purpose.[5] In examining a statute's language, we are to give the words their ordinary, everyday meaning unless the context requires otherwise.[6] The statutory language should be examined "in the context of the entire statute and the statutory scheme," and in a manner that gives significance to "every word, phrase, sentence, and part" of the legislative act.[7]

We begin with the text. Here, we analyze a statute that defines the scope of the groundwater conservation district's hiring authority. The Agency's hiring power is set forth in section 121-408, which states:

> The agency may contract with the county or United for staff and other services and may hire such other contractors and consultants as it considers appropriate.[8]

On its face, this language addresses two categories of authority: (1) to contract with the County of Ventura or the United Water Conservation District for "staff and other services"; and (2) to hire "other contractors and consultants." These terms are not expressly defined by the Agency's enabling act, but we can understand their contours by referring to general authorities.

As to the first category of authority, the term "staff" is well understood as referring to the personnel responsible for the internal operations of an institution.[9] The term "other services" is more vague, but by its association with the term "staff" we believe it may be fairly understood as including the kinds of things (besides staff) that either the County or United could be expected to provide to support the Agency's regular

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[5] *Tuolumne Jobs & Small Business Alliance v. Superior Court* (2014) 59 Cal.4th 1029, 1037.

[6] *Halbert's Lumber, Inc. v. Lucky Stores, Inc.* (1992) 6 Cal.App.4th 1233, 1238.

[7] *Brennon B. v. Superior Court* (2022) 13 Cal.5th 662, 673; *Tuolumne Jobs & Small Business Alliance v. Superior Court*, *supra*, 59 Cal.4th at p. 1038; see also *Plantier v. Ramona Municipal Water Dist.* (2019) 7 Cal.5th 372, 386 (statutes should not be read in way that renders language meaningless).

[8] We interpret the permissive term "may" here as allowing the Agency to exercise either or both staffing options (County or United) authorized by section 121-408, rather than forcing a choice between the two options. (See *Compton College Federation of Teachers v. Compton Community College Dist.* (1982) 132 Cal.App.3d 704, 711–712.)

[9] E.g., American Heritage Dict., 4th ed., p. 802 ("the personnel of an enterprise"); Merriam-Webster's Collegiate Dict., 11th ed., p. 1213 ("officers chiefly responsible for the internal operations of an institution or business . . . a group of officers appointed to assist a civil executive . . . the personnel who assist a director in carrying out an assigned task").

internal operations, such as office space, photocopying and other document management services, mail and delivery services, and the like.[10]

As to the second category of "other contractors and consultants," we can understand more about these terms from their position and juxtaposition within the statute. Importantly, we believe that the term "other contractors and consultants" must necessarily mean something distinct from "staff and other services," otherwise there would be no point in using the two different phrases within the one statute. It is contrary to general principles of statutory construction to interpret a statute in a way that makes some of its words mere surplusage.[11] Further, the words "contractors and consultants" are part of a longer phrase, i.e., "[the agency] may hire such other contractors and consultants as it considers appropriate." The words "such other" denote, again, a distinction between contractors and consultants on the one hand, and staff and other services on the other. And the words "as it considers appropriate" suggest a measure of discretion in the Agency about how to hire such assistance, if at all. Whereas the Agency can obtain "staff and other services" only from the County or United, it can retain "other contractors and consultants" from any source "it considers appropriate."[12]

With those considerations in mind, we now consider whether the statute allows the Agency to hire its own staff, or to contract with an entity other than the County or United for staff services. We conclude that it does not. Because the Agency's second category of authority extends only to contracting for non-staff services, we conclude that the Agency may contract for staff only with the County or United.

Generally speaking, a statutory grant of authority is considered to carry the implied negative that no power may be exercised which is more than the authority granted.[13] That general principle supports the view that, by expressly authorizing the

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[10] See *California Farm Bureau Federation v. California Wildlife Conservation Bd.* (2006) 143 Cal.App.4th 173, 189 ("*Noscitur a sociis* (literally, 'it is known from its associates') means that a word may be defined by its accompanying words and phrases, since 'ordinarily the coupling of words denotes an intention that they should be understood in the same general sense.' (2A Sutherland, Statutory Construction (6th ed. 2000) § 47.16, pp. 268–269, fn. omitted)."); *Yates v. United States* (2015) 574 U.S. 528, 545 (plur. opn. of Ginsburg, J.) (describing related canon of *ejusdem generis*).

[11] See *Dyna-Med, Inc. v. Fair Employment & Housing Com.* (1987) 43 Cal.3d 1379, 1386–1387 ("A construction making some words surplusage is to be avoided").

[12] For example, the Requestor reports that the Agency has used its authority to hire non-staff "contractors and consultants" to retain a technical consulting firm to assist with the Agency's five-year evaluation of its groundwater sustainability plan.

[13] 79 Ops.Cal.Atty.Gen. 128 (1996), citing *Wildlife Alive v. Chickering* (1976) 18 Cal.3d 190, 196, and *Safer v. Superior Court* (1975) 15 Cal.3d 230, 236–238.

Agency to "contract with the county or United for staff and other services," the Legislature foreclosed the Agency from contracting with other entities for staff services. Significantly, the Legislature made a different choice in another, comparable enactment. The enabling legislation for the Ojai Basin Groundwater Management Agency was enacted in 1991 and otherwise echoes section 121-408. In contrast to section 121-408, however, the Ojai agency's enabling legislation provides: "The agency *may contract for staff and other services* and may hire other contractors and consultants."[14] The difference in language is clear, and strongly suggests that the restrictive phrase "with the county or United" in section 121-408 was meant to limit the Agency's staffing options.[15]

Of course, we should consider the text of section 121-408 not only within itself, but also as it relates to the whole statutory scheme of which it is a part. The statutory scheme reveals that the Agency has implied powers to carry out its objectives and purposes in addition to its express powers. The Fox Canyon Groundwater Management Agency Act provides that the Agency "shall exercise the powers granted by this act for purposes of groundwater management within the boundaries of the agency, together with such other powers as are reasonably implied and necessary and proper to carry out the objectives and purposes of the agency."[16]

But we see no basis for concluding that the Agency has implied power to hire personnel to assist in administering the regular business of the district. Section 121-102 itself limits the Agency's implied powers to those that are "necessary and proper to carry out the objectives and purposes of the agency."[17] Some reasonable level of staffing is certainly necessary to carry out the agency's work, but section 121-408 does not leave the Agency bereft of staff; it merely limits the Agency to a hiring pool consisting of staff that have been hired through the County or through United.[18] The implied powers doctrine may not be used to circumvent this express restriction on the Agency's contracting authority.[19]

Furthermore, when a statute prescribes the manner and mode by which a power may be exercised, courts have held that the mode prescribed is the measure of the

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[14] Wat. Code App., § 131-409.

[15] See *County of San Diego v. San Diego NORML* (2008) 165 Cal.App.4th 798, 825.

[16] Wat. Code App., § 121-102.

[17] *Water Quality Assn. v. County of Santa Barbara* (1996) 44 Cal.App.4th 732, 746.

[18] *Podiatric Medical Board of California v. Superior Court of City and County of San Francisco* (2021) 62 Cal.App.5th 657, 673 (no need to resort to implied powers when existing statute addresses actual power).

[19] 2A McQuillin, Municipal Corporations (3d ed., 2024 update) § 10:13.

power.[20] In other words, by expressly providing that the Agency may contract for staff services with either the County or United, section 121-408 both grants a measure of authority and prescribes the mode of exercising that authority. Were the Agency to engage a different party to provide staff services, it would be disregarding the mode prescribed by the Legislature for hiring staff.[21] All points considered, we find no support in the Agency's enabling legislation for concluding that the Agency may hire its own staff, or contract with an entity other than the County of Ventura or the United Water Conservation District for staff services.

Finally, we consider whether the Agency might derive its hiring authority from another source. Beyond its enabling legislation, the Agency has the same authority as any other special district to contract for "special services and advice" under Government Code section 53060, which provides in pertinent part:

> The legislative body of any public or municipal corporation or district may contract with and employ any persons for the furnishing to the corporation or district special services and advice in financial, economic, accounting, engineering, legal, or administrative matters if such persons are specially trained and experienced and competent to perform the special services required.

By its express terms, Government Code section 53060 is limited to contracting for "special services and advice." The term "special services" has been construed by courts to mean services that are unique, unusual, or out of the ordinary.[22] Whether services may be considered "special" depends on factors including the qualifications of the person furnishing the services, and whether such services are available from public sources.[23] Staff services such as preparing regular reports, plans, and budgets would be considered neither unique nor out of the ordinary, and would therefore not fall within the hiring authority of section 53060. So we do not see how section 53060 could supply the Agency with authority to contract for staff other than with the County or United.

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[20] *Ibid.*, citing *People v. Zamora* (1980) 28 Cal.3d 88, 98, and *Wildlife Alive v. Chickering*, *supra*, 18 Cal.3d at p. 196.

[21] See *Bottoms v. Madera Irr. Dist.* (1925) 74 Cal.App. 681, 698–699 (statutory grant of power must be exercised in accordance with limitations and restrictions on mode of exercise of granted power).

[22] *Costa Mesa City Employees' Assn. v. City of Costa Mesa* (2012) 209 Cal.App.4th 298, 315–316; see *Jaynes v. Stockton* (1961) 193 Cal.App.2d 47, 51.

[23] *Darley v. Ward* (1982) 136 Cal.App.3d 614, 627–628 (services may be considered "special" because person furnishing them has outstanding skill or expertise).

Given the express language of Water Code Appendix section 121-408 addressing staffing, we conclude that the Fox Canyon Groundwater Management Agency may contract only with the County of Ventura and the United Water Conservation District for staffing services.

CALLEGUAS MUNICIPAL WATER DISTRICT

web site: www.calleguas.com

2100 OLSEN ROAD • THOUSAND OAKS, CALIFORNIA 91360-6800 805/526-9323 • FAX: 805/522-5730

Gene West, Chair
Fox Canyon Groundwater Management Agency
800 S. Victoria Ave.
Ventura, CA 93009

February 3, 2025

Chair West:

This letter serves to inform the Fox Canyon Groundwater Management Agency (FCGMA) Board and stakeholders of the results of the recent election to the Board of the representatives from the special districts and mutuals.

In accordance with Section 401 of the FCGMA enabling legislation, members of the governing boards of Alta Mutual Water Company, Berylwood Mutual Water Company, Calleguas Municipal Water District, Camrosa County Water District, Del Norte Mutual Water Company, Pleasant Valley County Water District, and Zone Mutual Water Company were invited to an election at Calleguas Municipal Water District on January 30, 2025. The following representatives were in attendance:

- Alta Mutual Water Company: Leslie Leavens
- Calleguas Municipal Water District: Raul Avila (previous alternate FCGMA Board member) and Reddy Pakala
- Camrosa Water District: Gene West (current FCGMA Chair)
- Pleasant Valley County Water District: Tom Vujovich
- Zone Mutual Water Company: John Menne
- Berylwood and Del Norte were invited but did not send representatives.

Mr. Vujovich moved that Mr. West be reappointed Chair and Mr. Pakala appointed alternate. Mr. Avila seconded. A vote by acclamation produced unanimous approval.

Congratulations, Chair West, on your reappointment.

Sincerely,

Ian Prichard, Deputy General Manager

From:	FCGMA
To:	FCGMA
Subject:	FYI: Governor Newsom issues Executive Order N-16-25
Date:	Monday, February 3, 2025 11:19:22 AM
Attachments:	image001.png image002.png

Good morning,

Please see the below information, shared by request.

Regards,

Fox Canyon Groundwater Management Agency
800 S. Victoria Ave. L#1610
Ventura, CA 93009
(805) 654-2014 | fcgma@ventura.org
www.FCGMA.org

Hello,

See below from DWR. Please share with others.

Best regards,

Kelly

Kelly Long
Ventura County Supervisor
District 3

Begin forwarded message:

> **From:** Department of Water Resources <DWR@public.govdelivery.com>
> **Date:** January 31, 2025, at 6:08:51 pm GMT-7
> **Subject: Governor Newsom issues Executive Order N-16-25**

CALIFORNIA NATURAL RESOURCES AGENCY

Governor Newsom issues Executive Order N-16-25

This bulletin was sent at 01/31/2025 05:07 PM PST

CALIFORNIA DEPARTMENT OF WATER RESOURCES
SUSTAINABLE GROUNDWATER MANAGEMENT OFFICE

This is an email from the Department of Water Resources' Sustainable Groundwater Management Office.

Please do not reply directly to this email; for more information or general inquiries, please contact: sgmps@water.ca.gov.

Governor Newsom issues Executive Order N-16-25

Governor Newsom today signed Executive Order N-16-25, which set forth the conditions under which water users may divert and store excess water from incoming winter storms.

Specifically, the Executive Order suspends the local flood plan requirement of Water Code 1242.1, which codified many elements of the previous 2023 Flood Executive Orders and allows for diversions of flood flows for recharge without water rights. The State Water Resources Control Board has updated its 1242.1 Technical Guidance that provides additional details of the existing 1242.1 requirements and addresses today's Executive Order.

For more information on the Executive Order:

- Release Information
- Executive Order

SAVE OUR WATER
SaveOurWater.com

EXECUTIVE DEPARTMENT
STATE OF CALIFORNIA

EXECUTIVE ORDER N-16-25

WHEREAS on April 21, 2021, May 10, 2021, July 8, 2021, and October 19, 2021, I proclaimed States of Emergency to exist across all counties in the State due to drought conditions; and

WHEREAS on September 4, 2024, I terminated the drought State of Emergency in 19 counties, while maintaining the drought State of Emergency in the remaining 39 counties of the State because the multi-year nature of the drought yielded ongoing, significant impacts in those 39 counties (the "Proclaimed Drought Counties"), which include the Sacramento and San Joaquin River basins; the Tulare Lake basin; the Scott, Shasta, and Klamath River watersheds; and the Clear Lake watershed; and

WHEREAS even now, many groundwater basins remain depleted in the Proclaimed Drought Counties from overreliance and successive multi-year droughts; and

WHEREAS on March 10, 2023, March 31, 2023, and May 17, 2023, I issued Executive Orders N-4-23, N-6-23, and N-7-23, to facilitate Californians' ability to divert stormwaters and flood flows to recharge groundwater basins following storms in early 2023, to mitigate the effects of the drought State of Emergency on groundwater supplies, which were then substantially codified in statute through the enactment of Senate Bill No. 122 (2023), and the relevant provisions of those Orders were subsequently terminated; and

WHEREAS the relevant provisions of Senate Bill No. 122, codified at Water Code section 1242.1, authorize diversions for groundwater recharge where a local or regional agency has adopted a local flood-control plan pursuant to Water Code section 8201 or has considered flood risk as part of its most recently adopted general plan; and

WHEREAS local and regional agencies require more time to adopt these local flood-control plans or to update their general plans, and so the requirement of such plans would interfere with landowners' ability to make use of Senate Bill No. 122 to divert stormwaters for groundwater recharge in the interim; and

WHEREAS the State is anticipating significant precipitation associated with winter storms in late January and early February 2025, and is remaining vigilant to manage the impacts of that precipitation while maximizing opportunities for groundwater recharge and other drought relief; and

WHEREAS under the provisions of Government Code section 8571, I find that strict compliance with various statutes and regulations specified in this Order would prevent, hinder, or delay the mitigation of the drought State of Emergency in the Proclaimed Drought Counties.

NOW, THEREFORE, I, GAVIN NEWSOM, Governor of the State of California, in accordance with the authority vested in me by the State Constitution and statutes, including the California Emergency Services Act, and in particular, Government Code sections 8567, 8571, and 8627, do hereby issue the following Order to become effective immediately.

IT IS HEREBY ORDERED THAT:

1. All provisions contained in the above-referenced Proclamations of a State of Emergency and related Executive Orders shall remain in full force and effect, except as terminated, withdrawn, or otherwise modified in subsequent Proclamations and Orders.

2. The requirement in Water Code section 1242.1, subdivision (a)(1), that a local or regional agency have "adopted a local plan of flood control pursuant to Section 8201" or have "considered flood risk as part of its most recently adopted general plan" is suspended in the Proclaimed Drought Counties. A local or regional agency in the Proclaimed Drought Counties may therefore trigger the remaining provisions of Water Code section 1242.1 without having adopted a local flood-control plan pursuant to Water Code section 8201 or having considered flood risk as part of its most recently adopted general plan.

3. The Department of Water Resources is directed to take all feasible and appropriate action to maximize diversions of excess flows that become available as a result of the anticipated winter storms, and other winter storms, to storage, including storage in San Luis Reservoir.

4. The Department of Water Resources, the State Water Resources Control Board, the Natural Resources Agency, and the Environmental Protection Agency are directed to identify any obstacles that would hinder efforts to maximize diversions to storage of excess flows that become available as a result of the anticipated winter storms, to remove or minimize such obstacles wherever possible, and to promptly report to my office any additional statutory or regulatory barriers that should be considered for suspension.

I FURTHER DIRECT that as soon as hereafter possible, this Order be filed in the Office of the Secretary of State and that widespread publicity and notice be given of this Order.

This Order is not intended to, and does not, create any rights or benefits, substantive or procedural, enforceable at law or in equity, against the State of California, its agencies, departments, entities, officers, employees, or any other person.

IN WITNESS WHEREOF I have hereunto set my hand and caused the Great Seal of the State of California to be affixed this 31st day of January 2025.

GAVIN NEWSOM
Governor of California

ATTEST:

SHIRLEY WEBER, PH. D
Secretary of State

FOX CANYON
GROUNDWATER MANAGEMENT AGENCY

A STATE OF CALIFORNIA WATER AGENCY

February 12, 2025

Board of Directors
Fox Canyon Groundwater Management Agency
800 South Victoria Avenue
Ventura, CA 93009-1600

SUBJECT: **Resolution of Appreciation for Agency Counsel Alberto Boada** – *(New Item)*

RECOMMENDATION: Adopt Resolution 2025-01 honoring Agency Counsel Alberto Boada for 18 years of Agency service.

BACKGROUND:
Mr. Boada began his career at the County of Ventura as Assistant County Counsel with the Ventura County Counsel's Office in November 2004. He assumed the Agency Counsel position in May 2006. Mr. Boada brought his deep legal experience and advisory skills to the Agency to assist and guide its preparation and implementation of numerous Agency policies, programs, projects, and legislation; he has dutifully served staff, Board, and stakeholders as Agency Counsel for the past 18 years.

DISCUSSION:
Mr. Boada announced his retirement in January. His last day of service to the Agency will be February 14, 2025.

CONCLUSION:
Staff recommends that your Board adopt Resolution No. 2025-01 (attached as Exhibit 16A), honoring, recognizing, and thanking Mr. Boada for his service to the Agency. This letter has been reviewed by Agency Counsel. If you have any questions, please call me at (805) 654-2954.

Sincerely,

Arne Anselm
Interim Executive Officer

Attachment: Exhibit 16A – Resolution 2025-01

Resolution 2025-01

Fox Canyon Groundwater Management Agency

HONORING

Alberto Boada

WHEREAS, Agency Counsel Alberto Boada started his public service career as an assistant county counsel with the Ventura County Counsel's Office in November 2004 and assumed the role of Agency Counsel in May 2006, dutifully advising and representing the Agency for the past 18 years; and

WHEREAS, Mr. Boada brought his legal experience and skills to the Agency to assist and guide its preparation and implementation of numerous Agency policies, programs, projects, and legislation, and was thus instrumental in advising the Agency on its implementation and compliance with the Sustainable Groundwater Management Act and its many new policies, programs, and requirements for sustainable groundwater management; and

WHEREAS, Mr. Boada brought his litigation experience and institutional knowledge of the Agency to advise on its defense of several lawsuits, including *Pleasant Valley County Water Agency v Fox Canyon Groundwater Management Agency*; *City of Oxnard v Fox Canyon Groundwater Management Agency*; *Las Posas Water Rights Coalition, et al. v. Fox Canyon Groundwater Management Agency, et al.* (LPV Adjudication); and *OPV Coalition, et al. v. Fox Canyon Groundwater Management Agency, et al.* (OPV Adjudication); and

WHEREAS, Mr. Boada staffed the meetings of the Fox Canyon Groundwater Management Agency Board of Directors throughout his tenure, advising directors on parliamentary procedure, the Brown, conflicts of interest, and guiding the Agency 's response to numerous questions from directors, staff, and stakeholders, and via his quiet personality and dry intellect Mr. Boada has brought valuable perspective, insight, and levity to a variety of complex projects, issues, and situations, and will be missed by the Fox Canyon Groundwater Management Agency Board of Directors, Agency staff, and the many consultants and colleagues he touched; and

WHEREAS, Mr. Boada will conclude his 18 years of service to the Agency on February 14, 2025.

NOW, THEREFORE, BE IT RESOLVED, that the Board of Directors of the Fox Canyon Groundwater Management Agency honors and thanks **Alberto Boada** for his dedication and for his invaluable years of service to the Agency, and wishes him a well-deserved, happy retirement.

APPROVED AND ADOPTED THIS 12TH DAY OF FEBRUARY 2025 BY THE BOARD OF DIRECTORS.

____
Eugene West, Chair

____
Kelly Long, Vice Chair

____
Lynn Maulhardt, Director

____
Tony Trembley, Director

____
Michael Craviotto, Director

February 12, 2025

Board of Directors
Fox Canyon Groundwater Management Agency
800 South Victoria Avenue
Ventura, CA 93009-1600

SUBJECT: County of Ventura Water Resource Mapping Presentation – *(New Item)*

RECOMMENDATION: Receive and file a presentation from the County of Ventura Public Works Agency regarding the development of a Countywide water mapping database.

BACKGROUND:
The County has acquired funding and hired a consultant to develop a Countywide water mapping database that would ideally serve as an interactive encyclopedia of water resources and emergency information. This tool will aid planning and management initiatives, which could include State reporting and potential grant and loan pursuits. It's anticipated that this publicly accessible shared resource will support water agencies of all sizes, with a particular focus on supporting under-resourced and smaller agencies. The scope of work includes outreach efforts with small water purveyors, municipal advisory councils (MACs), local water associations, and other groups to gather input on potential needs that could be met by this project and recommended approaches for development.

Based on input gathered so far, the County is currently updating the Public Works Agency (PWA) Ventura County Geographical Information System (GIS) Mapping Application[1] with water system information layers that contain:

- Supplier service area boundaries
- Supplier system information linked to external State, federal, and private organization databases
    - Agency information (contacts, connections, population & demographics, facilities, regulatory compliance, etc.)
    - System type (private, community, non-community, etc.)
    - Supply source
    - Water quality and risk information
    - Sustainable Groundwater Management Act (SGMA) information
    - Safe Drinking Water Information System reporting
- Suppliers' County Water Availability Letter (WAL) status

[1] https://maps.ventura.org/pwagisviewer/

CONCLUSION:
This letter has been reviewed by Agency Counsel. If you have any questions, please call me at (805) 654-3942.

Sincerely,

Arne Anselm
Interim Executive Officer

February 12, 2025

Board of Directors
Fox Canyon Groundwater Management Agency
800 South Victoria Avenue
Ventura, CA 93009-1600

SUBJECT: Calleguas Water Resources Implementation Strategy Presentation – *(New Item)*

RECOMMENDATION: Receive and file a presentation from Calleguas Municipal Water District on the Water Resources Implementation Strategy (WRIST).

BACKGROUND:
Calleguas Municipal Water District (Calleguas) is a wholesale water district in southeastern Ventura County. Calleguas provides imported water from the Metropolitan Water District of Southern California (Metropolitan) to 19 retail agencies, including the Cities of Oxnard, Port Hueneme, Camarillo, Thousand Oaks, and Simi Valley, as well as County Waterworks Districts, special districts, mutual water companies, and investor-owned utilities. Approximately 650,000 residents, three-quarters of the county's population, receive their drinking water in whole or in part from Calleguas. Calleguas also owns and operates the Las Posas Aquifer Storage and Recovery Wellfield, comprised of 18 injection/extraction wells in the East Las Posas Valley Basin that allows Calleguas to store water for later use. As a "constituent group" in the Las Posas Valley Watermaster Policy Advisory Committee, Calleguas is an active participant in developing approaches to meet the long-term sustainability goals of the Las Posas Groundwater Sustainability Plan and the Final Judgment in the Las Posas Valley Basin adjudication.

Calleguas Municipal Water District's mission is "to provide the service area with a reliable supplemental supply of regional and locally developed water in an environmentally and economically responsible manner."

Calleguas is currently entirely dependent on Metropolitan for supply and located within an area of the Metropolitan service area unable to receive significant quantities of Colorado River water. That renders Calleguas almost entirely dependent on State Water Project water and therefore at the mercy of hydrological conditions and droughts that threaten the reliability of State Water Project supplies. In the 2020-2022 drought, State Water Project supplies were severely curtailed, causing Metropolitan to enact an

Emergency Water Conservation Program that forced Calleguas and its retailers to limit outdoor watering to one day a week. The Calleguas Board understood this crisis as a call to action and reoriented the district's strategic direction.

DISCUSSION:
With its "New Model for Resilience," the Calleguas Board determined that its future would involve greater resilience through partnerships and regional collaboration to develop water supply, storage, conveyance, and programs. Staff have spent the last 18 months working on a Water Resources Implementation Strategy (WRIST) with its retail and regional partners, including the City of Ventura, United Water Conservation District, Casitas Municipal Water District, and Las Virgenes Municipal Water District. The WRIST builds on Calleguas's history of regional collaboration to address short-term outages and long-term water supply reliability and resiliency by characterizing and evaluating portfolios of projects with a regional focus. Phase One of the WRIST, which identifies the preferred portfolio of projects and programs, identifies "no-regret" projects, and recommends next steps, has been completed.

CONCLUSION:
Kristine McCaffrey, Calleguas General Manager, and Ian Prichard, Calleguas Deputy General Manager, will present the findings of Phase One of the WRIST, with an emphasis on the groundwater-related aspects of the projects and programs included in the preferred portfolio.

This letter has been reviewed by Agency Counsel. If you have any questions, please call me at (805) 654-3942.

Sincerely,

Arne Anselm
Interim Executive Officer

February 12, 2025

Board of Directors
Fox Canyon Groundwater Management Agency
800 South Victoria Avenue
Ventura, CA 93009-1600

SUBJECT: City of Oxnard Groundwater Recovery Enhancement and Treatment Program Presentation – *(New Item)*

RECOMMENDATION: Receive and file a presentation from the City of Oxnard regarding an update to the Groundwater Recovery Enhancement and Treatment (GREAT) Program.

BACKGROUND:
Since the late 1990s, the City of Oxnard has pursued a recycled water program, commonly known as the Groundwater Recovery Enhancement and Treatment (GREAT) program. Since then, many steps have been completed on this journey to comprehensive and connected water supply projects and programs to improve reliability, water quality, and resiliency in an ever changing environment. The most significant and first step was the completion of the Advanced Water Purification Facility (AWPF), which has been delivering ultra-pure recycled water since February 2016.

In addition to wastewater recycling, the GREAT program evaluated and contemplated other projects. These include projects for groundwater injection and storage and recovery to provide an additional water supply source to the Oxnard Plain as outlined in the June 26, 2013, Fox Canyon Groundwater Management Agency staff report, and the California Environmental Quality Act (CEQA) document referenced within said staff report. Some of these additional projects, which are projects that can be found in other sustainable groundwater basins in Southern California, include seawater injection barrier wells and aquifer storage and recovery wells.

CONCLUSION:
Staff from the City of Oxnard's Public Works Department will provide updates on the Aquifer Storage and Recovery project and other related capital improvement projects from the GREAT program.

This letter has been reviewed by Agency Counsel. If you have any questions, please call me at (805) 654-3942.

Sincerely,

Arne Anselm
Interim Executive Officer

February 12, 2025

Revised with Exhibits Added

Board of Directors
Fox Canyon Groundwater Management Agency
800 South Victoria Avenue
Ventura, CA 93009-1600

SUBJECT: Agency Staffing Analysis Report Presentation – *(New Item)*

RECOMMENDATION: Receive and file a presentation by Hallmark Group on the Agency Staffing Needs Analysis.

BACKGROUND:
Following your Board's discussion at the December 1, 2023[i], meeting regarding future staffing needs of the Agency and the discussion at the January 12, 2024[ii], meeting on Agency task prioritization, on March 27, 2024[iii], your Board directed an independent report be provided at the April 24, 2024, meeting on the Agency's staffing needs to accomplish the Board priorities identified at the January meeting.

To get an unconflicted opinion from outside the Agency, the Hallmark Group was contracted to identify the staffing needs to accomplish your Board's identified priorities, including efforts needed to comply with the LPV Judgment.

Your Board received a progress report on April 24, 2024[iv]. Updates were subsequently given to the Executive Committee on June 20, 2024, and October 14, 2024[v]. Through this process the scope grew to be comprehensive of all Agency staffing needs, beyond the priorities identified on January 12, 2024.

DISCUSSION:
Over several months in 2024, Hallmark Group held multiple interviews with Agency staff to understand responsibilities and staffing requirements. Agency staff supplied time estimates for tasks that were included within the work plan or within the task level shown in the Agency Work Task and Prioritization sheet (attached as Exhibit 20A). Using their understanding of public agency staffing and requirements imposed on groundwater sustainability agencies by the Sustainable Groundwater Management Act, Hallmark Group performed a qualitative assessment during staff interviews to develop appropriate task assumptions and reviewed this assessment against the final draft staff hours. Many additional activities were identified during the analysis, which were not identified in the original FCGMA Work Task and Prioritization sheet. These include, but are not limited to, supervision and personnel issues, process improvement, training, consultant management, strategic planning, grant proposals, stakeholder outreach, website management, and the financial management of

payments. Hallmark Group made an effort to identify and quantify the staff needs for these additional tasks.

Hours tracked by staff for billing the Agency was found lacking as a dependable source of data since overtime is not paid to salaried staff and is not tracked in the accounting system.

The estimates include some administrative tasks currently performed by consultants due to insufficient staffing levels, but they do not include consultants hired for their special expertise, such as groundwater modelers and hydrogeologists for writing the recently submitted periodic evaluations, or outside counsel for litigation. Fiscal services provided by the County are also not included in the estimates, which range from nuanced financial reporting to accounts receivable, audit support, and general accounting.

CONCLUSION:
Hallmark's report *(attached as Exhibit 20B)* estimates approximately 20 full-time equivalents (FTEs) are needed to arrive at a level of staffing necessary to accomplish the Agency's work *(see also the FCGMA Staff Time Analysis spreadsheet, attached as Exhibit 20C)*.

Currently, staff are only able to perform a subset of the tasks for the administration of the Agency, and the FTE identified to do this task subset is approximately 15 FTE. For context, at one point in 2024, the Agency was down to five staff members. As of today's meeting, the Agency stands at eleven of twelve full-time positions filled.

Today, your Board will receive a presentation from Hallmark on the staff needed for the Agency to accomplish its responsibilities and implement your Board's priorities.

This letter has been reviewed by Agency Counsel. If you have any questions, please call me at (805) 654-3942.

Sincerely,

Arne Anselm
Interim Executive Director

Attachments: Exhibit 20A – FCGMA Work and Task Prioritization
Exhibit 20B – FCGMA Staff Analysis Report
Exhibit 20C – FCGMA Staff Time Analysis Spreadsheet

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[i] See 12/1/2023 meeting recording and Item 1 materials at https://ventura.primegov.com/Portal/Meeting?meetingTemplateId=17783.
[ii] See 1/12/2024 meeting recording and Item 2 materials at https://ventura.primegov.com/Portal/Meeting?meetingTemplateId=17969.
[iii] See 3/27/2024 meeting recording and Item 10 materials at https://ventura.primegov.com/Portal/Meeting?meetingTemplateId=18525.
[iv] See 4/24/2024 meeting recording and Item 3 materials at https://ventura.primegov.com/portal/item?id=267170.
[v] See 10/14/2024 draft presentation given to the Executive Committee at https://ventura.primegov.com/portal/viewer?id=368077&type=2.

Exhibit 20A – FCGMA Board Meeting, 2/12/2025

FCGMA Work Tasks and Prioritization

Task	Frequency	Importance	Urgency	Current Priority
I. Board Meetings				
1. Board meetings, agendas, minutes	Ongoing	Important	Urgent	1
2. Committee meetings, agendas, minutes	Ongoing	Important	Urgent	1
II. Legislation and Regulations				
1. GSP 5-Year Evaluation	Periodic	Important	Urgent	2
2. GSP Annual Reports	Periodic	Important	Urgent	2
3. Annual Work Plan & Budget	Periodic	Important	Urgent	2
4. Biennial Audit	Periodic	Important	Urgent	2
5. Public Records Act (PRA) Requests	Ongoing	Important	Urgent	2
III. Judgment and Litigation				
1. LPV Adjudication Judgment	Ongoing	Important	Urgent	3
a. Watermaster Admin	Ongoing	Important	Urgent	3
b. Basin Optimization Yield Study	Periodic	Important	Urgent	3
c. Basin Optimization Plan	Periodic	Important	Urgent	3
2. OPV Adjudication	Ongoing	Important	Urgent	3
a. Discovery	Ongoing	Important	Urgent	3
IV. Ordinance				
1. Semi-Annual Statements (SAES)	Ongoing	Important	Urgent	4
a. Programming and mailing	Periodic	Important	Urgent	4
b. Processing	Ongoing	Important	Urgent	4
1. Entering paper SAES	Periodic	Important	Urgent	4
2. Review flowmeter photos	Ongoing	Important	Urgent	4
3. Payments, refunds, etc.	Ongoing	Important	Urgent	4
4. Customer service, walk-ins, etc.	Ongoing	Important	Urgent	4
2. Well Permit Applications	Periodic	Important	Urgent	4
3. Allocation Transfer Requests	Periodic	Important	Urgent	4
4. Flowmeters & AMI	Ongoing	Important	Urgent	4
a. Calibration review & processing	Ongoing	Important	Urgent	4
b. Flowmeter replacement, rollover, water usage estimates	Ongoing	Important	Urgent	4
c. AMI data management	Ongoing	Important	Urgent	4
5. Owner and/or operator changes	Ongoing	Important	Urgent	4
6. Compliance/Enforcement	Ongoing	Important	Not Urgent	5
a. Non-reporting	Ongoing	Important	Not Urgent	5
b. Failure to register change of owner/operator	Ongoing	Important	Not Urgent	5
c. Flowmeter calibration	Ongoing	Important	Not Urgent	5
d. AMI	Ongoing	Important	Not Urgent	5
V. Resolution				
1. Conejo Creek Project	Ongoing	Important	Not Urgent	5
2. NPV Desalter	Ongoing	Important	Not Urgent	5
3. GREAT / RWPA Program	Ongoing	Important	Not Urgent	5
VI. Grant - SGM implementation Rd 1				
1. OPV Monitoring Well Installation	Ongoing	Important	Urgent	6
2. Subgrantee awards to UWCD, PVCWD, Camarillo	Ongoing	Important	Urgent	6
3. Quarterly reports	Ongoing	Important	Urgent	6
VII. Board Direction				
1. Oxnard well destruction (in progress)	One-Time	Important	Urgent	6
2. Project Prioritization	Periodic	Important	Not Urgent	7
3. Replenishment Fee	One-Time	Important	Not Urgent	7
4. OPV variance applications	One-Time	Important	Not Urgent	7
5. New data management system procurement	One-Time	Important	Not Urgent	7
6. CombCode - ordinance amendments	One-Time	Important	Not Urgent	7
7. Study of independent staffing for Agency	One-Time	Important	Not Urgent	7

STAFF REQUIREMENT ANALYSIS FOR THE FOX CANYON GROUNDWATER MANAGEMENT AREA

Revised: February 6, 2025

Scope of Work

Hallmark Group was contracted to develop a report analyzing the staffing requirements for the Fox Canyon Groundwater Management Agency FCGMA) tasks listed in the "FCGMA Work Tasks and Prioritization" table for the end of the calendar year (9-months) and a full 12-month period.

Hallmark Group identified additional tasks that are required to run and operate the FCGMA. Findings were presented to the Executive Committee (EC) on June 20, 2024, and the EC directed Hallmark to include those additional tasks in the staff analysis.

At the EC meeting on June 20, 2024, the EC requested that all third-party efforts (underway or planned) doing the work that FCGMA staff would perform if sufficiently staffed were included in the analysis, and Hallmark worked with FCGMA staff to ensure those hours were included in the analysis.

Staffing Analysis Methodology

Hallmark Group developed an excel sheet of the main tasks in the FCGMA Work Tasks and Prioritization sheet and identified subtasks to assist in creating detailed work hour estimates. Interviews were held with FCGMA staff to review staffing requirement assumptions and FCGMA supplied estimates for those subtasks that were rolled up to the task level shown in the FCGMA Work Task and Prioritization sheet and the additional tasks identified by the Hallmark Group and reviewed with the EC. Following the initial interviews, Hallmark Group reached out to staff regularly to receive additional information and further refine the analysis.

Hallmark Group requested staff provide estimates for tasks not initiated yet which are color-coded in blue. These include vacant positions and tasks not initiated by currently staffed positions.

Hallmark Group used its understanding of public agency staffing requirements to provide a qualitative assessment during staff interviews to develop appropriate task assumptions and in reviewing the final draft staff hours.

Report Considerations / Assumptions

- The estimates included in the report represent the hours necessary to operate the FCGMA, not the hours staff are currently working since historically, overtime is not tracked in the FCGMA system.
- The tasks listed in the FCGMA Work Tasks and Prioritization sheet do not include all the tasks required to manage and operate the FCGMA. Additional tasks were included for an accurate FCGMA staffing assessment.

- OPV Adjudication is a new process and staffing estimate was based on Hallmark's experience as Watermaster in the Antelope Valley Adjudication.
- The analysis includes estimates for several vacant positions. However, since October 2024, staff have been onboarded, and hours may need to be refined for those staff.
- The analysis does not include indirect costs (i.e. office space, equipment, energy, or County overhead, etc.).
- County overhead (fiscal service, and ancillary IT support, etc.) is outside this scope of work and was not calculated as part of this analysis.

Conclusions

The detailed FCGMA staffing analysis is provided as Attachment 1 and key findings are provided below.

- Currently, staff is performing a subset of the required tasks for the administration of FCGMA, and the full-time equivalent (FTE) of this task subset is approximately 15 employees.
- The estimated level of staffing to perform all the required tasks (unimitated tasks and the additional identified tasks) is approximately 20 FTEs.
- Using employee rates that include employee benefits and overhead, the estimated staff costs to perform all required FCGMA tasks is $5.7 million.

Potential Next Steps

- Refine staff analysis to reflect input from the EC and/or the Board
- Perform additional analysis to include FCGMA indirect costs
- Prepare a report that identifies total costs for operation of FCGMA

Exhibit 20C - ***Addition to Revised Agenda Packet***
FCGMA Board Meeting, 2/12/2025

	B C D E F	G	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	W	X	Y	Z	AA	AB	AC	AF	AG
1	FCGMA STAFF ANALYSIS																								
2	Hours for tasks not started yet displayed in **blue** text																								
3	Highlighted yellow rows indicate 9-month tasks																								
4	Ref. #	Task Description	No/Limited Hours	9-Month Only	Student Worker III	IT Support	Clerk of the Board	MA II	MA III (part-time)	Admin Assist II	Admin Assist II	Staff Services Specialist	Compliance Specialist	WR Specialist	Hydrogeologist (part-time)	Hydrogeologist	Hydrogeologist	Engineer II	Assistant Manager	Groundwater Manager	Interim Executive Officer	Monthly Hours	Monthly FTE	Frequency	Assumptions
5	Task Reference				Hrs	Hrs	Hrs	Hrs	Hrs	Hrs	Hrs	Hrs	Hrs	Hrs	Hrs	Hrs	Hrs	Hrs	Hrs	Hrs	Hrs	Hrs	160		
6	I.	**Board Meetings**					95.50	0.00	0.00	0.00	0.00	22.00	2.25	1.75	0.00	30.00	0.00	15.50	27.75	59.75	49.00	303.50	1.90		Monthly, 3-hr meeting
7	1	**Board meetings, agendas, minutes**																							
8	a	Maintaining mailing lists					0.50															0.50	0.00		
9	b	Scheduling/Logistics/Board member follow-up (parking permits, Form 700 filings)					13.00															13.00	0.08		
10	c	PM Monday meeting with EO																	1.00	4.00	4.00	9.00	0.06		
11	d	Agenda development					8.00											1.00	0.50	1.00	2.00	12.50	0.08	Monthly	
12	e	Board doc development/review					4.00											1.00			4.00	9.00	0.06	Monthly	
13	f	Develop financials and POB																			0.50	0.50	0.00		
14	g	Board presentation development										2.00	1.50	1.75		5.00		2.00	4.00	8.00	4.00	28.25	0.18	Monthly	
15	h	Board letter (drafts and reviews)					10.00									5.00		2.00	9.00	24.00	20.00	70.00	0.44	Monthly	
16	i	Board meeting					5.00					3.00				3.00		3.00	3.00	6.00	4.00	27.00	0.17	Monthly	
17	j	Board follow up/tasks					12.00					4.00						1.00	1.50	1.50	2.00	22.00	0.14	Monthly	
18	k	Pre and post debriefing board meetings					2.00					2.00				3.00		1.00	3.00	6.00	1.00	18.00	0.11		
19	l	Contract modification follow-up (post Board direction)					4.00															4.00	0.03		
20	m	Drafting, proofing, and (post-Board approval) filing amendments, resolutions; publishing on website					4.00															4.00	0.03		
21	n	Filing NOEs, scheduling and publicizing hearings					2.00													0.50		2.50	0.02		
22	o	Draft Minutes					6.00												0.50	1.00	0.50	8.00	0.05	Monthly	
23	p	Noticing meeting [Entering into PrimeGov, updatin					6.00															6.00	0.04		
24																									
25	2	**Committee meetings, agendas**																							
26	a	Agenda development					2.00					2.00						0.25	1.00	1.00	2.00	8.25	0.05		Based on 3-4 meetings per year
27	b	Committee doc development/review					4.00											0.50	1.00	2.00	2.00	9.50	0.06		
28	c	Committee presentation development										2.00	0.75			5.00		1.00	1.00	2.00	1.00	12.75	0.08		
29	d	Committee meeting					3.00					5.00				5.00		2.00	1.50	2.00	1.00	19.50	0.12		
30	e	Committee follow up/tasks					8.00					2.00				4.00		0.75	0.75	0.75	1.00	17.25	0.11		
31	f	Noticing meeting					2.00															2.00	0.01		
32																									
33	II.	**Legislation and Regulations**			0.00		125.25	0.00	2.50	30.00	30.00	19.00	0.00	0.00	4.00	61.25	47.42	60.25	48.50	48.25	31.17	506.08	3.17		
34	1	**GSP 5-Year Evaluation**		✓																				once/5 yr	
35	i	OPV																							
36	a	PM with consultant																4.00	4.00	4.00	4.00	16.00	0.10		
37	b	Review of 3 public workshop materials														2.00	2.67	0.25	0.25	0.50	0.50	6.17	0.04		
38	c	Review United modeling summary as needed and meetings on EBB project														4.00		6.00	0.75	2.00	0.50	13.25	0.08		
39	d	Process invoices for consultant					2.00												1.50	0.50		4.00	0.03		
40	e	Fiscal processing (County staff dedicated [not full time])																				-	-		
41	f	Workshop promo / outreach Q&A / site logistics					8.00									2.00			1.00	0.25		11.25	0.07		
42	g	Prep with Dudek (1 hr/wkshop)														5.00	0.67	2.00	0.50	0.75	0.50	9.42	0.06		
43	h	Public workshop attendance (3hrs/workshop)					2.00		1.00							2.00		3.00	1.00	1.00	0.50	10.50	0.07		3 OPV workshops
44	i	Request, file and forward data					2.00									1.00	0.89	1.00	1.25			6.14	0.04		
45	j	Review draft reports														9.00	8.89	8.00	2.00	2.00	1.00	30.89	0.19		
46	k	Staff upload to DWR portal														2.00	1.33	0.50	0.50			4.33	0.03		
47																						-	-		
48	ii	LPV																						once/5 yr	
49	a	Website updates (as-needed)					15.00											1.00	6.00		0.50	22.50	0.14		
50	b	Noticing (email) for workshops, report drafts, etc.					5.00											1.00				6.00	0.04		
51	c	Request and compile GW data (elevation, quality) and send to Dudek														1.00	0.56	8.00	1.00			10.56	0.07		
52	d	Review draft GSP evaluation report														5.00	4.00	8.00	1.50	1.50		20.00	0.13		
53	e	PAC draft memos for PAC consultation tasks related to GSP																	2.00	2.00	1.00	5.00	0.03		
54	f	Response reports to PAC recommendation report					0.50											1.00	3.00	8.00	2.00	14.50	0.09		
55	g	TAC being assembled					0.75												0.50		0.50	1.75	0.01		
56	h	TAC consultation (new uses, annual reports, basin optimization yield study, basin optimization yield plan, localized restrictions on extractions, interim increase to ramp down, adjustment of carryover parameters,)																2.00	1.25	12.00	2.00	17.25	0.11		
57	i	Draft memos for TAC consultation related to GSP																3.00				3.00	0.02		
58	j	Staff upload to DWR portal															0.67	0.50				1.17	0.01		
59	k	Log, code, track and route invoices from counsel, consultants					1.00															1.00	0.01		
60																						-			
61	2	**GSP Annual Reports**																	0.75			0.75	0.00	Monthly	
62	i	OPV																				-			
63	a	Coordinate with consultant on development														1.00	1.00	1.00	1.50	1.00	0.50	6.00	0.04		
64	b	Review results with subcommittee																1.00	0.25	0.75		2.00	0.01		
65	c	Public outreach (mailing, posting, develop comment matrix with staff response)					2.00												0.50	0.50	1.00	4.00	0.03		
66	d	Process invoices for consultant					1.00												0.50			1.50	0.01		
67	e	Request, file and forward data to consultant					0.50									4.00	0.75	1.00	0.50			6.75	0.04	monthly	
68	f	Review draft reports													1.00	5.00	4.25	1.00	0.75	0.75	0.50	13.25	0.08	monthly	annual time split to monthly
69	g	Staff prepare for and upload to DWR portal														1.00		0.50	0.25			1.75	0.01	monthly	annual time split to monthly
70																						-	-		
71	ii	LPV																							
72	a	Coordinate with consultant on development																1.00	2.25	1.25	0.50	5.00	0.03		
73	b	Review results with subcommittee																1.00	0.75	0.75		2.50	0.02		
74	c	Public outreach (mailing, posting, develop comment matrix with staff response)					2.00												0.50	0.50	1.00	4.00	0.03		
75	d	Process invoices for consultant					1.00												0.50			1.50	0.01		
76	e	Request, file and forward data to consultant					0.50									0.50	0.50	1.00	0.25			2.75	0.02	monthly	annual time split to monthly
77	f	Review draft reports													1.00	2.25	2.25	1.00	0.25	0.75	1.00	8.50	0.05	monthly	annual time split to monthly
78	g	Staff upload to DWR portal														0.50	6.00	0.50				7.00	0.04	monthly	annual time split to monthly
79																									
80	3	**Annual Work Plan & Budget**																				-	-	Monthly	
81	a	Draft/update workplan and budget					6.00									2.00	2.00	0.25	0.50			10.75	0.07		
82	b	Budget mid-year review					4.00					2.00			2.00				1.50	1.50	2.00	13.00	0.08		
83	c	Budget & cash flow development										2.00							3.00	3.00	2.00	10.00	0.06		
84	d	Review with committee					5.00												0.50	0.50	4.00	10.00	0.06		
85	e	Finalize budget (finalize, post on web, etc.)					2.00														0.50	2.50	0.02		
86	f	Proof / format					1.00															1.00	0.01		
87	g	Draft Proposed budget report					10.00														2.67	12.67	0.08		
88																									
89	4	**Biennial Audit**																		0.75		0.75	0.00		
90	a	Develop RFP and on-board audit firm					4.00														0.50	4.50	0.03		
91	b	Staff interface on audit development					15.00					2.00				2.00	1.00				0.50	20.50	0.13		
92	c	Staff review of audit report					2.00		0.50			2.00									0.50	5.00	0.03		
93	d	Process invoices for consultant					2.00															2.00	0.01		
94																						-	-		
95	5	**PRAs**																							
96		Number?? Staff effort. Coord with legal?					15.00					1.00				2.00	2.00	0.25	1.25	0.25		21.75	0.14	Monthly	
97	a	Public Inquiries					10.00		1.00	15.00	15.00	5.00				4.00	4.00	0.50	1.25	0.75	0.50	57.00	0.36	Monthly	
98	b	Customer Inquiries					6.00			15.00	15.00	5.00				4.00	4.00	1.00	3.00	0.75	0.50	54.25	0.34	Monthly	
99																									
100	III.	**Judgment and Litigation**			0.00		18.00	35.00	0.00	22.00	22.00	31.00	6.00	0.00	1.33	27.00	17.00	10.75	68.50	35.25	33.00	364.58	2.29		
101	1	**LPV Adjudication Judgment**													1.33							1.33	0.01	4 mtgs	
102	a	Watermaster Admin																			4.00	4.00		52 mtgs	3 meetings per month
103	1	Initial mailout to recipients																				-	-		
104	2	PRAs														2.00	2.00	1.00	0.75	1.00		6.75	0.04		
105	3	Budget and workflow					1.00											0.25	3.00	1.00	4.00	9.25	0.06		
106	4	Maintaining Constant Contact/stakeholder lists						1.00											4.00		0.50	5.50	0.03		
107	5	Customer inquiries					3.00	5.00				5.00				2.00	2.00		3.00	1.00	1.00	22.00	0.14		
108	6	Change of extraction, well replacement (new-replacement)														2.00	2.00		0.50	2.00		6.50	0.04		
109	7	Data analysis missing wells database vs judgment																1.00	2.00	1.00		4.00	0.03		
110	8	WMID confirmations and changes						0.50										1.00	1.75	1.00	0.50	4.75	0.03		
111	9	Transfers, Overuse														6.00	4.00	0.50	1.50	1.00		13.00	0.08		
112	10	Carryover														3.00	2.00	0.50	1.50	1.00		8.00	0.05		
113	11	Delinquencies and enforcement														3.00	3.00	0.50	5.00	1.00		12.50	0.08		
114	12	Watermaster webpage, design, content & review					8.00												3.00	1.00		12.00	0.08		
115	13	Noticing and update watermaster site (PAC and TAC develops agendas and minutes)					2.00												2.00	1.00	0.50	5.50	0.03		
116	14	Developing database specifications for LPV reporting and testing, invoices						1.00				5.00							5.00	2.00	0.50	13.50	0.08		
117	15	Develop Extraction and Monitoring tool for LPV reporting										2.00						0.25	5.00	1.00	0.50	8.75	0.05		

	B	C	D	E	F	G	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	W	X	Y	Z	AA	AB	AC	AF	AG
118				16	Database design, additions, changes, testing							0.50				5.00							5.00	2.00	1.00	13.50	0.08		
119				17	Processing LPV BA payments & associated tasks							5.00		0.00	0.00	2.00							2.50	1.00		10.50	0.07		
120				18	LPV annual allocations																	0.50	3.00	0.25	0.50	4.25	0.03		
121				19	Semi Annual groundwater extraction and use reporting															3.00	2.00	0.50	5.00			10.50	0.07		
122					i	FCGMA staff coordination/directing/testing for RGS										5.00										5.00	0.03		
123					ii	FCGMA staff response to stakeholder inquiries						4.00				1.00						0.50				5.50	0.03		
124					iii	RGS (consultant) developing reporting tool -- could be staff time										1.00						0.25				1.25	0.01		
125					iv	RGS inquiries										1.00										1.00	0.01		
126					v	Landowner inquiries						2.00				1.00						0.25				3.25	0.02		
127				20	Process invoices for counsel, consultants						1.00															1.00	0.01		
128				21	Basin Assessment (Quarterly billing)																					-	-		
129					i	Develop invoices and send out (water use based on judgement), ensure permanent transfers are included						5.00														5.00	0.03		
130					ii	Processing / AR						5.00		15.00	15.00	2.00										37.00	0.23		
131						Landowner inquiries																0.25				0.25	0.00		
132						Enforcement / penalty assessment						6.00		7.00	7.00	1.00						0.25				21.25	0.13		
133					iii	Monthly status report/update to FCGMA Board					1.00															1.00	0.01		
134				22	PAC meetings every two weeks (3-6pm)												6.00					2.00	3.00	1.00		12.00	0.08	Monthly	2 meetings per month
135				23	Review and potential response to PAC recommendation report																	0.25	4.00			4.25	0.03		
136				24	PAC draft memos for PAC consultation tasks not related to GSP and more policy as defined in judgment																	0.25				0.25	0.00		
137				25	Response reports to PAC recommendation report																	0.25				0.25	0.00		
138				26	PAC member replacement																					-	-		
139				27	Review and potential response (up to 16) to TAC recommendation report																		4.00			4.00	0.03		
140																										-	-		
141			b	Basin Optimization Yield Study			x													3.00		0.25	1.00	8.00	2.00	14.25	0.09	wkly	Every other week follow up with Jim/debrief (as needed)
142																										-	-		
143			c	Basin Optimization Plan			x													3.00		0.25	1.00	4.00	2.00	10.25	0.06		
144																										-	-		
145		2	**OPV Adjudication**																						16.00	16.00	0.10		
146			a	Discovery							1.00												2.00	4.00		50.08	0.31		
147					Process invoices for counsel, consulting counsel						1.00															1.00	0.01		
148			b	OPV Watermaster Admin																						98.38			Rough estimate based on Antelope Valley
149																													
150																										-	-		
151	IV.		**Ordinance**						80.00		1.00	139.00	9.50	138.50	138.50	215.00	163.00	170.42	0.75	88.00	204.00	5.00	55.00	20.00	8.50	1436.17	8.98		
152				**Well Registration**																					2.00	2.00	0.01		
153				a	Unregistered wells													11.00	0.75	5.00	6.00		0.50	0.50		23.75	0.15	monthly	
154				b	Owner and/or operator changes															5.00	6.00		0.50			11.50	0.07	monthly	
155					1	Validate SWN / APN / Owner / Agent						0.00		2.00	2.00	5.00		3.00								12.00	0.08	600 + Wells	Per well occurrence
156					2	Validate / Set Up Account Structure & network files						10.00														10.00	0.06		
157					3	Revised/New SAES & Outreach						5.00		5.00	5.00	5.00							2.00			22.00	0.14		
158					4	Scan / File / Notes						10.00					0.50	1.00								11.50	0.07		
159																										-	-		
160		1	**Semi-Annual Statements (SAES)**																							-	-	4 mtgs	
161			a	Programming and mailing																						-	-	52 mtgs	3 meetings per month
162				1	Design updates (ea. enhancement)											5.00							2.00	0.50		7.50	0.05		Each occurrence
163				2	Develop business rules							2.00				5.00							1.00			8.00	0.05		Each occurrence
164				3	Testing							2.00				4.00							2.00			8.00	0.05		Each occurrence
165				4	Production / Mail							10.00	1.00	2.00	2.00	2.00	6.75	8.00					0.50			32.25	0.20		Each occurrence
166																										-	-		
167			b	Processing																						-	-	wkly	Every other week follow up with Jim/debrief (as needed)
168				1	Entering paper SAES							15.00	1.00	5.00	5.00	0.00	2.00									28.00	0.18	monthly	Per SAES
169				2	Review flowmeter photos							2.00		16.00	16.00	6.00	1.25	11.50		3.00	4.00		1.00			60.75	0.38	monthly	Per meter
170				3	Review reported extractions							5.00		15.00	15.00	5.00				6.00	3.00		1.00			50.00	0.31		
171				4	Payments (apply payment, generate receipt, fiscal report)							10.00	0.50	15.00	15.00	0.00										40.50	0.25	monthly	Per SAES
172				5	Refunds (research, memo, approval, adjustment receipt, transmittal)							5.00		2.00	2.00	1.00							0.50			10.50	0.07	monthly	Per refund
173				6	Customer service, walk-ins, etc.							10.00	2.00	10.00	10.00	10.00										42.00	0.26	monthly	Each occurrence
174				7	Deficiency reporting (research, correspondence, follow up)							2.00		35.00	35.00	30.00				5.00	4.00		10.00	2.00		123.00	0.77	monthly	Each occurrence
175				8	CP Waivers (review, report, memo, db adjustment, correspondence, records update)							2.00		10.00	10.00	15.00								2.00		39.00	0.24	monthly	Each occurrence
176				9	CombCode changes (review permit conditions & owner approval, account / file setup, correspondence)							1.00		2.00	2.00	15.00				4.00	4.00					28.00	0.18	monthly	Each well
177				10	Surcharges							3.00		5.00	5.00	10.00										23.00	0.14		
178				11	Supervisor/ Manager Follow-up/Review											5.00					6.00		10.00	2.00	0.50	23.50	0.15	monthly	
179				12	Non-Reporters							5.00		5.00	5.00	5.00				6.00	4.00		6.00	2.00		38.00	0.24		
180				13	Outreach							5.00	0.50			5.00				2.00	1.00					13.50	0.08		
181				14	Scanning & filing				80.00																	80.00	0.50		
182		2	**Well Permit Applications**																							-	-		
183				a	Review for completeness, process applications (including research, and analyses)															6.00	6.00	1.00	2.00	2.00	1.00	18.00	0.11	monthly	
184																										-	-		
185		3	**Allocation Transfer Requests**															6.67								6.67	0.04		
186				a	Variances - review for completeness, process applications (including research, and analyses)											5.00				16.00	130.00	1.50	3.00	3.00	1.00	159.50	1.00	monthly	
187				b	Transfers - review for completeness, process applications (including research, and analyses)											5.00				12.00	12.00	1.50	3.00	2.00		35.50	0.22	monthly	
188																										-	-		
189		4	**Flowmeters & AMI**																							-	-		
190				a	Calibration review and processing												14.00	12.75		4.00	4.00		1.00			35.75	0.22	monthly	
191				b	Flowmeter replacement, rollover											1.00	20.50	43.50		4.00	6.00					75.00	0.47	monthly	
192				c	AMI data management												24.50	35.00					3.50	1.25		64.25	0.40	monthly	
193				d	NOVs								1.00											1.00	1.00	3.00	0.02	monthly	
194				e	Annual Flowmeter Exemptions													7.00					0.25			7.25	0.05	monthly	
195				f	Domestic AMI Exemptions													7.00					0.25	0.25		7.50	0.05	monthly	
196				h	Groundwater Estimate Analysis							3.00				1.00	2.00	6.00				1.00	1.00	0.50		14.50	0.09	monthly	
197				i	Data Management System Meetings							4.00				1.00	0.75	3.00					2.50	1.00		12.25	0.08		
198																										-	-		
199		5	**Owner and/or operator changes**																							-	-		
200				a	Current monthly effort (what's happening)							5.00				5.00	0.75									10.75	0.07		
201				b	Backlog (est. of hours for monthly)							5.00		7.50	7.50	25.00		5.00								50.00	0.31		
202																										-	-		
203		6	**Compliance/Enforcement**																						2.00	2.00	0.01		
204			a	Mail meter calibration notices, NOVs, and letters.								5.00	1.00					2.00					0.75			8.75	0.05	Monthly	
205			b	Non-Reporting								5.00		2.00	2.00	10.00	23.00			4.00	3.00		0.75			49.75	0.31		
206			c	Failure to register change of owner/operator								5.00				10.00	6.00			4.00	3.00					28.00	0.18		
207			d	Flowmeter calibration								2.00					12.00			2.00	2.00					18.00	0.11		
208			e	AMI								1.00					15.00									16.00	0.10		
209			f	Late/Non-Reporters																					1.00	1.00	0.01		
210				1	Follow up with non-reporters								2.00					1.50								3.50	0.02		
211				2	Access Civil Penalties												8.00	1.00								9.00	0.06		
212				3	Data Entry (and billing) into FCGMA Online								0.50				14.00	3.00								17.50	0.11		
213				4	Recommendation to EO for enforcement action						1.00					4.00	4.00	1.00								10.00	0.06		
214				5	Process civil penalty											5.00	8.00	1.50								14.50	0.09		
215				6	Process multi-reporting period civil penalty waiver											10.00										10.00	0.06		
216																										-	-		
217	V.	**Resolution**							0.00		5.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2.00	32.00	38.50	11.25	6.75	2.75	4.00	102.25	0.64	Monthly	
218		1	**Conejo Creek Project**																						0.50	0.50	0.00		
219				a	Compliance monitoring															3.00	3.00	1.00	0.50	0.25		7.75	0.05	monthly	
220				b	Report Review															1.00	1.00	0.50	0.75	0.25		3.50	0.02	monthly	annual time split to monthly
221				c	Annual Meeting						1.00									0.00	0.25	0.25	0.25	0.25	0.50	2.50	0.02	monthly	annual time split to monthly
222				d	Follow -up and reviews						1.00									2.00	1.50	1.00				5.50	0.03		
223																										-	-		
224		2	**NPV Desalter**																							-	-		
225				a	Compliance monitoring															3.00	3.00	1.00	0.50	0.25		7.75	0.05	monthly	
226				b	Report Review															4.00	2.00	0.50	0.75	0.25		7.50	0.05	monthly	annual time split to monthly
227				c	Annual Meeting						1.00									1.00	0.50	0.25	0.25	0.25		3.25	0.02	monthly	annual time split to monthly
228				d	Scheduling follow-up meetings to review redline updates						1.00									4.00	3.00	1.00				9.00	0.06		
229																										-	-		
230		3	**GREAT / RWPA Program**																						1.00	1.00	0.01		
231				a	Compliance monitoring															1.00	2.00	1.00	0.50	0.25		4.75	0.03	monthly	
232				b	Report Review															1.00	3.00	0.50	1.50	0.25		6.25	0.04	monthly	annual time split to monthly
233				c	Follow-up correspondence and reviews						1.00									1.00	2.00	1.00				5.00	0.03		
234																										-	-		
235		4	**Credits**																2.00						1.00	3.00	0.02		
236				a	Review reporting															6.00	4.00	1.00	1.50	0.25		12.75	0.08	monthly	annual time split to monthly
237				b	Update credit records															1.00	0.25	1.00	0.25	0.25		2.75	0.02	monthly	annual time split to monthly

Item 20C - Addition to Revised Agenda Packet
FCGMA Board Meeting, 2/12/2025

	B	C	D	E	F	G	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	W	X	Y	Z	AA	AB	AC	AF	AG
238																										-	-		
239		5	**Board Approved Projects**																								-	-		
240			i	CMWD LPVB ELPMA ASR																					0.25	1.00	1.25	0.01		
241				a	Compliance monitoring																	3.00	2.50	1.00				6.50	0.04	monthly	
242				b	follow up																	1.00	0.50	0.25				1.75	0.01		
243																										-	-		
244		6	**Update Resolutions (including project resolutions)**																								-	-		
245			a	Prepare drafts (with counsel input)																		8.00						8.00	0.05		
246			b	Present to Board																		2.00						2.00	0.01		
247																										-	-		
248	**VI.**	**Grant - SGMA Imp. Rd 1**							0.00		2.00	0.00	3.25	0.00	0.00	0.00	10.00	0.00	86.66	9.00	9.50	5.00	2.50	1.00	6.00	134.91	0.84		
249		1	**OPV monitoring well installation**					✓					1.00						24.16	2.00	2.00				4.00	33.16	0.21	Annual	
250				a	Process consultant invoices									1.25													1.25	0.01		
251				b	Construction support (Dudek)													10.00										10.00	0.06		
252				c	Task and information administration									1.00													1.00			
253																										-	-		
254		2	**Subgrantee awards to UWCD, PVCWD, Camarillo**					✓																		1.00	1.00	0.01	Annual	
255				a	Process consultant invoices							1.00															1.00	0.01		
256																										-	-		
257		3	**Quarterly reports**					✓																		1.00	1.00	0.01	Annual	
258				a	Collect, review invoices and develop invoice package																						0.25		0.25	0.00	Annual	
259				b	Grant closeout reports (final deliverables, etc.)																						0.25		0.25	0.00	Annual	
260				c	Post-grant performance reports																						0.25		0.25	0.00		
261																										-	-		
262		4	**Grant -Follow-up Compliance**					✓														1.50	1.00		0.25		2.75	0.02	monthly	
263																										-	-		
264		5	**GSP Implementation**					✓																			-	-		
265			a	Monitoring well installation and follow-up monitoring															62.50	3.00	2.00	2.00	0.50			70.00	0.44	monthly	
266			b	Meetings, studies, analyses ….																4.00	4.00	2.00	0.50			10.50	0.07	monthly	
267			c	Process consultant invoices							1.00												1.50			2.50	0.02		
268																										-	-		
269	**VII.**		**Board Direction**						0.00		3.00	1.00	0.50	0.00	0.00	8.00	2.00	0.00	6.67	8.00	4.00	3.75	3.75	13.50	9.20	63.37	0.40	Ongoing	
270		1	**Oxnard well destruction**					✓											6.67							6.67	0.04		
271		2	**Project prioritization**							1.00											0.25		0.50	1.00	2.75	0.02		
272		3	**Replenishment fee**				x														0.25	0.25	3.00	1.00	4.50	0.03		
273		4	**OPV variance applications**										1.00				5.00				4.00	4.00	2.00	1.00	3.00	3.20	23.20	0.15		
274		5	**New data management system procurement**													1.00	2.00			2.00			1.50	2.00	2.00	10.50	0.07		
275		6	**CombCode - ordinance amendments**				x				1.00									2.00		1.00	1.00	2.00	1.00	8.00	0.05		
276		7	**Study of independent staffing for Agency**				x				1.00		0.50			2						0.25		3	1.00	7.75	0.05		
277																												
278	**ADDITIONAL TASKS**																											
279	**1**			**Administration**					1.00	82.29	22.00	3.17	1.00	3.17	3.17	8.50	1.00	1.00	1.00	1.00	3.00	3.25	4.33	4.33	2.00	178.54	1.12		
280			a	Consultant management																									
281				1	Initial consultant procurement (RFPs)																						10.67	0.07		4 contract per year
282				2	Annual consultant contract renewal							5.00															1.33	0.01		
283				3	Monthly consultant management (touch base meetings, etc.)																						6.00	0.04		
284																											-		
285			b	FCGMA general strategy/planning																								-		
286				1	Periodic planning for FCGMA activities												1.50										1.33	0.01		
287																											-		
288			c	Legal counsel *overhead task, not included in the analysis																								-		
289				1	Routine																								-		
290				2	Litigation																								-		
291																											-		
292			d	HR / Personnel Issues																								-		
293				1	Mandatory training (5 hrs per staff annually) - sexual harassment, ethics, violence/security, supervisor, mgmt., diversity						0.5		0.5	0.5	1.00										6.67	0.04		
294				2	CEs (talk to John, Robert, Kathleen, Arne, Farai)																							-	-		
295				3	On-boarding new employees												1.00										1.00	0.01		
296				4	Performance evaluations / staff development												1.00										1.00	0.01		
297				5	Personnel matters												1.00										1.00	0.01		
298				6	Manager timesheet review												2.00										2.00	0.01		
299				7	Updating agency-related policies/manuals							5.00															5.00	0.03		
300																										-	-		
301			e	Insurance Renewal																							-	-		
302				1	Maintain insurance for GSAs (Directors & Officers, general liability, etc.)							3.00															3.00	0.02		
303																											-		
304			f	Grant Proposals											1.67	1.67							2	1	3.33	3.33	1	14.00	0.09	monthly	60 hours per grant application
305				1	Apply for 2 grants								1.67										1				2.67	0.02		
306				2	Grant management (if awarded) -- include in future budget																							-	-		
307				3	Grant admin																						12.33	0.08	monthly	
308																											-		
309			g	PRA Response																								-		
310				1	Response to PRAs (est. x number of requests)																						4.00	0.03		
311																											-		
312			h	State Trainings/workshops																								-		
313				1	DWR SGMA forum																		0.25				0.25	0.00		Semiannual; online
314				2	GRA conferences																							-	-		2-day conference in SAC
315				3	ACWA																							-	-		3-5-day semiannual conference
316				4	Brown Act training							8.00															8.00	0.05		Annual
317				5	Ethics training																								-		Every 2 years for elected officials
318																											-		
319			i	Departmental development																								-		
320				1	Process improvements				1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	17.00	0.11		
321				2	employee development																							-	-		
322																										-	-		
323																										-	-		
324			j	IT Support						81.29																81.29	0.51		
325				1	Online database																							-	-		
326																											-		
327	**2**	**Outreach**							0.00	0.00	12.25	8.00	0.00	0.00	0.00	8.00	0.00	0.00	0.00	0.00	0.00	0.50	0.00	0.00	0.00	45.50	0.28		
328			a	Monthly time for stakeholder support																	0.25				10.00	0.06		
329																											-		
330			b	Website update and hosting																								-		
331				1	Update website(s)												1.00										6.00	0.04		
332					a	Strategic planning for FCGMA.org website																							-		
333																											-		
334				2	Annual hosting/renewal																						2.00	0.01		
335																											-		
336			c	Mailings / Notices																								-		
337				1	OPV newsletter development							3.00	1.00				1.00						0.25				5.25	0.03		1 newsletter
338				2	OPV newsletter distribution/mailing								3.00														3.00	0.02		
339				3	LPV newsletter development							3.00	1.00				1.00										5.00	0.03		
340				4	LPV newsletter distribution/mailing								3.00														3.00	0.02		
341																											-		
342			d	Workshops																								-		
343				1	OPV (planning, meeting, follow up)							2.00															2.00	0.01		1 workshop
344				2	LPV (planning, meeting, follow up)							2.00															2.00	0.01		1 workshop
345				3	FCGMA							2.00					5.00										7.00	0.04		
346																											-		
347			e	Legislative tracking and potential response								0.25															0.25	0.00		
348																										-	-		
349	**3**	**Financial Management**							0.00	0.00	5.00	4.00	0.00	4.00	4.00	4.00	4.00	4.00	0.00	4.00	0.00	4.00	4.00	4.00	4.00	114.00	0.71		
350			a	FCGMA Monthly Invoicing & Financials																								-		
351				1	Individual FCGMA staff time tracking							2.00	4.00		4.00	4.00	4.00	4	4		4		4	4	4.00	4.00	46.00	0.29		Assume 11 employees, 1 hour per week
352				2	FCGMA staff invoice prep							1.00															4.00	0.03		
353				3	Review OPV consultant invoices							1.00															4.00	0.03		Includes meeting time with consultant (if needed)
354				4	Review LPV consultant invoices							1.00															4.00	0.03		Includes meeting time with consultant (if needed)
355				5	Prepare financial statements for FCGMA																						4.00	0.03		
356																											-		

Item 20C - Addition to Revised Agenda Packet
FCGMA Board Meeting, 2/12/2025

	B	D	E	G	I	K	L	M	N	O	P	Q	R	S	T	U	V	W	X	Y	Z	AA	AB	AC
357		b		Audit Coordination																				-
358			1	Select an auditor																			8.00	0.05
359			2	Annual prep with auditor																			4.00	0.03
360			3	Ongoing engagement with auditor before report																			16.00	0.10
361																								-
362		c		Budget Development																				-
363			1	Develop fiscal year budgets																			24.00	0.15
364																								-
365	**4**			**New / Replacement Well Review (AB 2079)**		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	-	
366		a		Replacement wells																			-	
367			1	Review xx applications and coordinate with applicant before GSA determination																			-	
368																								
369		b		New wells																			-	
370			1	Review xx applications and coordinate with applicant before GSA determination																			-	
371																								
372	**5**			**Clerk Specific**		0.00	0.00	6.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	6.50	13.00	0.08
373		a		Weekly 1:1 with EO				4.00														4.00	8.00	0.05
374		b		Project update meetings with EO				2.50														2.50	5.00	0.03
375																							-	
376	**5**			**Other Tasks (see Article 5 of Assembly Bill No. 2995)**		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	18.00	24.00	23.00	0.00	0.00	0.00	65.00	0.41
377		a		Data Collection, Investigations and Analysis													8.00	8.00	8.00				24.00	0.15
378		b		Groundwater Studies, and Projects													10.00	16.00	15.00				41.00	0.26
379																							-	
380	**6**			**Future Tasks**		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	35.50	22.00	0.00	0.00	0.00	57.50	0.36
381		a		Update Ordinance Code (including Chapter 4)														2.00	2.00				4.00	0.03
382		b		FCGMA Annual Reports (per enabling legislation)(includes the areas outside the DWR basins but inside Agency)														10.00	10.00				20.00	0.13
383		c		Installation of flowmeters and groundwater extraction reporting of all wells in the DWR basins (including "white area wells" per SGMA)														13.50	8.00				21.50	0.13
384		d		Research University well (aquifer(s) from which groundwater is being extracted)														10.00	2.00				12.00	0.08
385																								
386																								
387					**TOTALS (9-Month)**	Student Worker III	IT Support	Clerk of the Board	MA II	MA III (part-time)	Admin Assist II	Admin Assist II	Staff Services Specialist	Compliance Specialist	WR Specialist	Hydrogeologist (part-time)	Hydrogeologist	Hydrogeologist	Engineer II	Assistant Manager	Groundwater Manager	Interim Executive Officer	Monthly Hours	Monthly FTE
388					Current Work	0.00		38.25	0.00	4.25	0.00	0.00	0.00	10.00	0.00	69.17	42.00	29.17	0.00	23.00	35.50	17.00	268.33	1.68
389					Tasks not started yet											24.16			54.25	7.50		2.00	87.91	0.55
390					**All hours**	0.00		38.25	0.00	4.25	0.00	0.00	0.00	10.00	0.00	93.33	42.00	29.17	54.25	30.50	35.50	19.00	356.25	2.23
391					**TOTALS (12-Month)**	**Student Worker III**	**IT Support**	**Clerk of the Board**	**MA II**	**MA III (part-time)**	**Admin Assist II**	**Admin Assist II**	**Staff Services Specialist**	**Compliance Specialist**	**WR Specialist**	**Hydrogeologist (part-time)**	**Hydrogeologist**	**Hydrogeologist**	**Engineer II**	**Assistant Manager**	**Groundwater Manager**	**Interim Executive Officer**	**Monthly Hours**	**Monthly FTE**
392					Current Work	81.00		206.00	132.17	7.00	31.17	16.17	174.00	178.25	172.17	9.08	233.25	178.25	5.00	132.58	144.58	134.37	2,076.99	12.98
393					Tasks not started yet	-		51.25	58.00	5.50	166.50	181.50	141.50	-	5.00		3.00	175.50	105.00	57.25	8.00		1,056.38	6.60
394					**All hours**	**81.00**	**82.29**	**257.25**	**190.17**	**12.50**	**197.67**	**197.67**	**315.50**	**178.25**	**177.17**	**9.08**	**236.25**	**353.75**	**110.00**	**189.83**	**152.58**	**134.37**	**3,133.36**	**19.58**

Item 20C p. 4

February 12, 2025

Item Addition to Revised Agenda

Board of Directors
Fox Canyon Groundwater Management Agency
800 South Victoria Avenue
Ventura, CA 93009-1600

SUBJECT: Legislative Proposal to Amend Section 10726.6 of the Water Code – *(New Item)*

RECOMMENDATIONS: (1) Approve Support of a Legislative Proposal to Amend the Sustainable Groundwater Management Act (SGMA) to provide that Section 10726.6, *Action to Determine Validity of Plan*, sets forth the sole process for challenging a Groundwater Sustainability Plan and **(2)** Authorize the Chair to sign a Letter of Support.

BACKGROUND:
Indian Wells Valley Groundwater Authority (IWVGA) has requested that the Agency lend its support to a legislative proposal that would clarify the manner in which a party may bring a court challenge to a groundwater sustainability plan (GSP).

Your Board previously approved providing amicus support of a request by IWVGA to have the Court of Appeal clarify this issue in an adjudication action for the groundwater basin being managed by IVWGA. The Court of Appeal declined to review the issue and so the matter remains unsettled, which will prolong the outcome of the pending comprehensive adjudication of the Oxnard and Pleasant Valley groundwater basins. This Legislative Proposal would provide much-needed clarification to groundwater sustainability agencies and their stakeholders.

DISCUSSION:
The IWVGA has authored a legislative proposal (attached as Exhibit 21A) to amend the Sustainable Groundwater Management Act to clarify that a validation proceeding under Section 10726.6 is the sole venue for challenging the requirements of a groundwater sustainability plan adopted in accordance with SGMA.

The draft bill from Legislative Counsel is attached as Exhibit 21B. Per the Legislative Counsel's Digest: "Existing law, the Sustainable Groundwater Management Act, requires all groundwater basins designated as high- or medium-priority basins by the Department of Water Resources to be managed under a groundwater sustainability plan or coordinated groundwater sustainability plans, except as specified. Existing law requires the department to periodically review the groundwater sustainability plans developed by groundwater sustainability agencies pursuant to the act to evaluate whether a plan conforms with specified laws and is likely to achieve the sustainability goal for the basin covered by the plan. Existing law authorizes a groundwater sustainability agency that adopts a groundwater sustainability plan to file a court action to determine the validity of the plan no sooner than 180 days following the adoption of the plan, as provided.

“This bill would provide that, except for certain matters delegated to the department for evaluation, an action to determine the validity of a groundwater sustainability plan shall be the sole venue and process for challenging the validity of any part of, or determination in, an adopted groundwater sustainability plan, including, but not limited to, technical information, technical findings, and determinations of the basin’s safe or sustainable yield and the amount of groundwater in storage that may be safely extracted from the basin. The bill would require the court to employ an abuse of discretion standard in reviewing discretionary decisions, findings, or determinations made by the groundwater sustainability agency.”

CONCLUSION:
Staff recommends your Board approve and formally support the Legislative Proposal to Amend Section 10726.6 of the Water Code prepared by the Indian Wells Valley Groundwater Authority.

This letter has been reviewed by Agency Counsel. If you have any questions, please call me at (805) 654-3942.

Sincerely,

Arne Anselm
Interim Executive Officer

Attachments *(Exhibits are additions to Revised Agenda)*:
Exhibit 21A – Legislative Proposal 2025-2026 California Session, Issue Area Groundwater Adjudications, Proposed Amendment
Exhibit 21B – Draft Bill from Legislative Counsel

Legislative Proposal

2025-2026 California Session

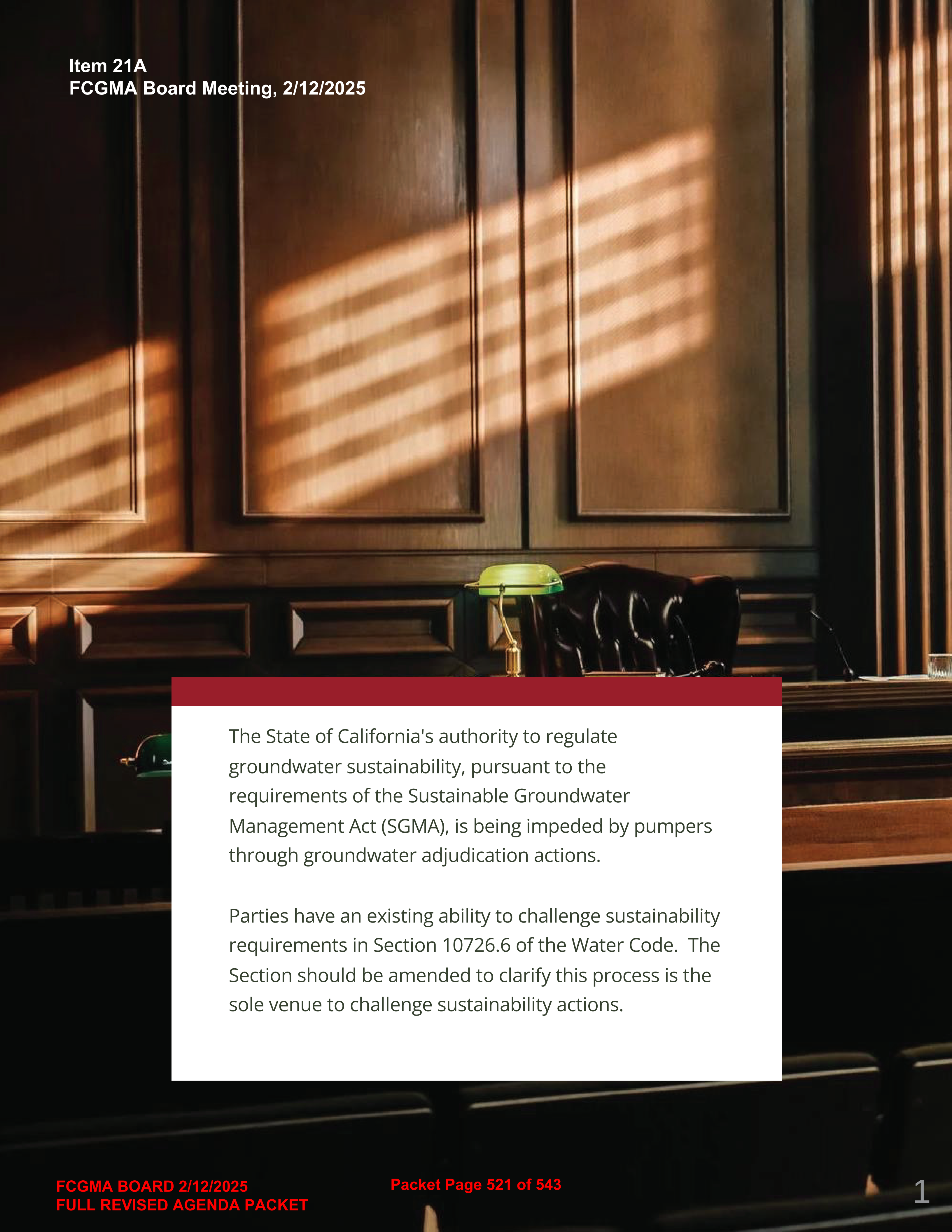
Sponsors:

INDIAN WELLS VALLEY GROUNDWATER AUTHORITY

Issue Area/Subject:

GROUNDWATER ADJUDICATIONS

Proposed Amendment: Section 10726.6 of the Water Code



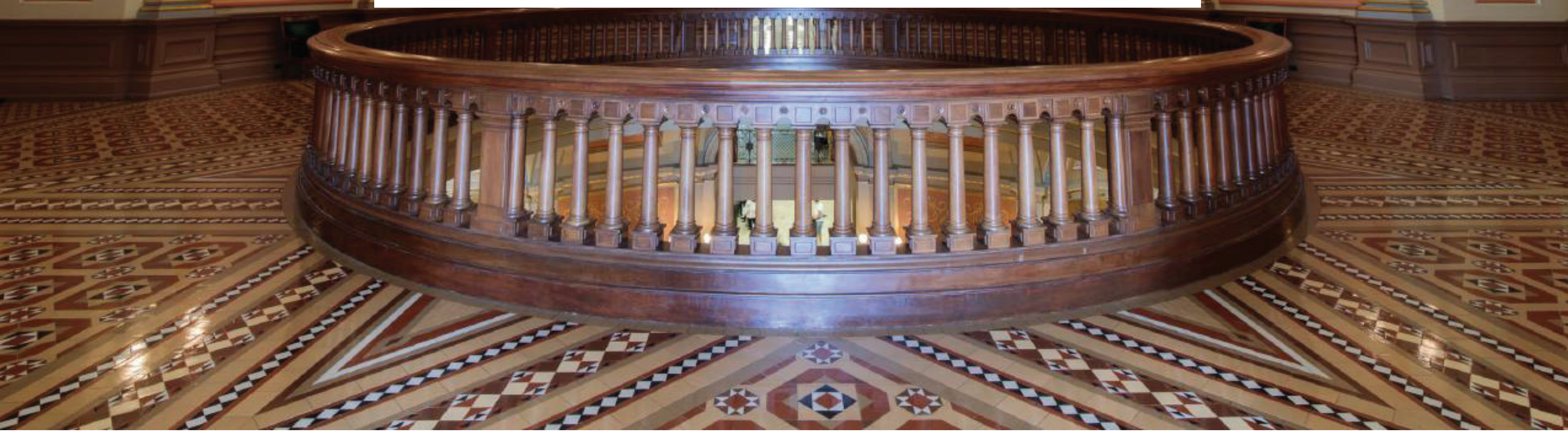
The State of California's authority to regulate groundwater sustainability, pursuant to the requirements of the Sustainable Groundwater Management Act (SGMA), is being impeded by pumpers through groundwater adjudication actions.

Parties have an existing ability to challenge sustainability requirements in Section 10726.6 of the Water Code. The Section should be amended to clarify this process is the sole venue to challenge sustainability actions.

POLICY QUESTIONS

Should opponents of State-approved groundwater sustainability measures be able to challenge those measures through both validation and groundwater adjudication proceedings?

Should a State-approved Groundwater Sustainability Plan be subject to de novo review years into its implementation?



Problem Statement

In three critically overdrafted groundwater basins, pumpers have used the adjudication process to bypass the statutory validation procedures and seek a de novo (complete with no deference given) review of State-approved Groundwater Sustainability Plans to thwart their implementation. If successful, the precedent set by these litigants will make the SGMA process moot.

Observation

Historically, groundwater adjudications have been required to establish a basin's "safe yield" and determine the available amount of water. Further, the courts have established a "physical solution" to maintain safe yield amounts.

With the adoption of SGMA, the courts' decisions in an adjudication proceeding are unnecessary. In an adjudication, the court does not need to reconsider the technical findings and safe yield determinations made in an approved GSP.

Challenges to a GSP are appropriately provided in a Writ as part of a reverse validation proceeding.

DISCUSSION

SGMA requires that Groundwater Authorities implement potentially costly projects to sustainably maintain groundwater basins. To provide the certainty needed to obtain third-party funding, SGMA provides a validation procedure that prevents a plan from being challenged in court once the validation period has ended.

Opponents of a groundwater sustainability plan (GSP) have multiple opportunities to challenge the findings and the implemented measures through the regulatory review process at the Department of Water Resources (DWR) and ultimately through the courts in a validation action. Validation actions, appropriately, have a statute of limitations requiring opponents to seek redress in a timely manner. GSPs are updated every five years, opening potential new issues for validation actions.

By contrast, groundwater adjudications do not have a statute of limitations. Opponents of GSPs are using the mechanism of groundwater adjudication as a backdoor to bypass the validation procedures. They argue that the court is required to permit them to challenge the basins' sustainable yields and implement physical solutions outside, and in direct contradiction, of the sustainability measures implemented within the State-approved GSP. In many cases, the comprehensive groundwater adjudication is filed years after the adoption of the GSP and many years into the implementation of sustainability measures, placing the ability to fund and implement projects in jeopardy.

Indian Wells Valley Groundwater Authority

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A CHILLING EFFECT ON SGMA AND THE STATE OF CALIFORNIA

"Once a final judgment is entered [in the adjudication], as a public agency, IWVGA will lack the discretion to act inconsistently with this Court's orders pertinent to the imposition of a physical solution."

[Mojave Pistachios, LLC v. Indian Wells Valley Groundwater Authority, Case No. 21-01187275, Mojave Pistachios, LLC Filing 06/03/2024, @ pg 9, lines 14-17]

"[T]hough not explicitly stated, the requirement of adhering to an existing GSP during an adjudication proceeding suggests that the GSP may be replaced as a result of the proceeding."

[Minute Order, Judge William D. Claster, Superior Court Orange County, Department CX-101, Mojave Pistachios, LLC v. Indian Wells Valley Groundwater Authority, Case No. 21-01187275, 08/06/2024]

"Nothing in [Section 10726.6 of the Water Code] or SGMA requires the Court to rigidly adhere to all of the findings underlying the GSP or precludes it from considering relevant technical information in formulating a physical solution."

[Minute Order, Judge William D. Claster, Superior Court Orange County, Department CX-101, Mojave Pistachios, LLC v. Indian Wells Valley Groundwater Authority, Case No. 21-01187275, 08/06/2024]

In three current SGMA-era groundwater adjudications, the court has set a trial to determine the groundwater basin's safe yield and establish a physical solution to meet sustainability. In all three basins, Fox Canyon, Cuyama Basin, and the Indian Wells Valley Basin, a State-approved GSP exists. These multi-year court actions essentially halt the sustainability measures within these critically over-drafted groundwater basins and allow litigants to continue to overdraft groundwater supplies while the court establishes the physical solution within the adjudication.

In at least two of these cases, opponents seek radically different safe yield amounts and sustainability requirements than those established within the GSP. The State, local taxpayers, and, in some cases, the federal government have invested tens of millions of dollars in implementing sustainability measures approved by the State that can now be overturned by the courts years after the State's approval.

The courts' decisions within the adjudications are unnecessary. The adjudication court has sole authority to set groundwater allocations. However, to set these groundwater allocations, the court does not need to reconsider the technical findings and safe yield determinations made in the GSP. Instead, the adjudication process should be “streamlined” by directing the court to rely on the existing technical determinations as a basis for the allocation awards. This would ensure that the judgments reached in the adjudications are consistent with the work performed by the State.

The State is not immune from this action. Under current court precedents, the court can review state-ordered sustainability or enforcement measures through adjudication. This would apply to probationary groundwater basins.

The best-case scenario for the court's ability to review the approved GSP or State-ordered actions through an adjudication is a delay in implementing the sustainability measures. This allows for the continued overdraft of the groundwater basin, further damaging the environmental resource. The worst-case scenario is that the court’s ability to review the approved GSP or the State-ordered actions through an adjudication renders SGMA meaningless by allowing the court to impose a physical solution outside of SGMA.

Should the latter scenario be upheld by a court, it calls into question the use of local taxpayer funds to implement sustainability measures that could simply be overturned or even stayed for a lengthy period of time through an adjudication. This would create the potential for nearly all groundwater basins to be managed by the State rather than through local GSAs.

THE LEGISLATURE HAS ATTEMPTED TO ADDRESS THE ISSUES

Several statutes address the court's ability to review an approved GSP, limit the ability to impair GSAs or the State's ability to implement sustainability and discuss appropriate guidance by the State Water Resources Control Board/DWR. They are simply being ignored.

Section 850(b) of the Code of Civil Procedure (as amended AB 779, Chapter 665, Statutes of 2023) authorizes a court to enter judgment in a comprehensive adjudication, in addition to existing requirements, if the court finds a) that the water use of small farmers and disadvantaged communities have been considered; and b) that the judgment will not substantially impair the ability of a GSA, SWRCB, or DWR to comply with SGMA and to achieve sustainable groundwater management. Unfortunately, the courts recently interpreted this section as a means to review the actions of the GSA, SWRCB, and DWR.

Section 10737.2 of the Water Code (as amended AB 779, Chapter 665, Statutes of 2023) requires the court to manage the adjudication proceedings in a manner that minimizes interference with the timely completion and implementation of a groundwater sustainability plan, avoids redundancy and unnecessary costs in the development of technical information and a physical solution, and is consistent with the attainment of sustainable groundwater management. In the current adjudications, this is being ignored, and a full-scale review of the GSPs is taking place within the adjudication process.

THE GSP CAN BE CHALLENGED: PARTIES HAVE EXISTING REDRESS

Section 10726.6 of the Water Code allows parties to challenge a GSP through a validation action. The SGMA statute actually provides longer time frames to file such a challenge in that it provides 180 days to file such a challenge. Typical validation statutes provide parties 60 days. Even with this additional ability, parties are being afforded the additional opportunity to challenge the GSP through the adjudication process.

In the Indian Wells Valley case, a party filed both a validation challenge to the GSP's implementation and an action challenging the imposition of a mitigation fee designed to purchase imported water supplies. The party has stayed the validation challenge in favor of pursuing a de novo review of the GSP through the adjudication. In its challenge to the mitigation fee, the party lost. The same set of facts is now being litigated in the adjudication process. Litigants are being allowed to forum-shop through various court actions, the findings, and the implementation of the GSP. The GSA may or may not be a named party within the adjudication. IWVGA intervened in the groundwater adjudication, recognizing the potential challenge to the GSP.

Adjudications are being perceived as a loophole within the law to provide for additional redress and review of the State-approved GSP These actions are tantamount to a reverse validation action.

Sufficient redress currently exists. Parties aggrieved by the requirements of a GSP may challenge the GSA’s finding through the regulatory process at DWR or by seeking a writ as required in the validation action. That process is subject to review by the Superior Court at a deferential standard similar to CEQA litigation. Litigants should not be allowed to seek de novo review of the GSP (a standard of review that provides no deference to the GSP) through the adjudication process. A GSA should not be subject to multiple court reviews of sustainability measures.

SMALL FARMERS, DISADVANTAGED COMMUNITY MEMBERS AND LOCAL TAXPAYERS BEAR THE COST BURDEN

Groundwater adjudication is a lengthy and expensive process. Litigants must be able to bear the substantial costs associated with such litigation to provide evidence to the court in defense of their water rights. Small farmers and disadvantaged communities with small water pumping operations (e.g., community service districts, mutuals, and individual well owners) often lack the substantial financial means necessary to become involved in the adjudication process. The Legislature again attempted to address this simple issue of due process in Section 850(b) of the Code of Civil Procedure. However, the three current adjudications have provided no such representation for small farmers and disadvantaged community members. In fact, litigants have successfully argued against the appointment of class counsel to provide the court with evidence on their behalf. Instead, small farmers and disadvantaged community members must rely upon the consideration of a judge, who may or may not be at some time in consultation with the SWRCB and who is without the provision of evidence in the adjudication trial, to consider their water rights.

As previously stated, groundwater adjudication is a lengthy and expensive process. The cost to a GSA to defend a GSP will reach millions of dollars. Those costs come from [volumetric] fees imposed on water users throughout the basin. In most cases, local agencies have already incurred significant costs in developing and beginning the implementation of sustainability measures. Litigation to satisfy an aggrieved party in multiple lawsuits should not be the responsibility of local residents.GSAs are in an unenviable position of deciding to cease operations and remand control of the basin to the State (through the SWRCB). This shifts the litigation costs associated with groundwater adjudication to the State.

WHAT HAPPEN'S NEXT

The Fox Canyon and Cuyama Basin cases are pending trial. In the Indian Wells Valley case, a Writ to the California State Supreme Court is pending. The State's imposed sustainability measures in the probationary Kings County basin have been stayed pending trial. If the appellate court does not take up the IWVGA appeal or it is denied, it is hard to imagine a scenario where work on SGMA would continue.

Thus far, State Agencies have adopted a wait-and-see approach, opting not to engage in the adjudications. That approach has led to recent court decisions, as the State has not asserted its jurisdiction over SGMA. If the court undermines the State-approved GSP, GSAs may disband and require the State to enforce SGMA requirements. What is the incentive for public agencies to continue spending millions of dollars to develop and implement GSPs if the courts disregard that work at a de novo standard of review? Simply put, if the court is to provide no deference to the local agency’s determinations, it would behoove the agency to bypass the GSA process altogether and file an adjudication suit.

The need for the California Legislature to clarify the State's role in the governance of groundwater sustainability is critical. Perceived loopholes being used by litigants to initiate multiple challenges and reverse validation actions years after the implementation of a State-approved GSP must be closed. During these court actions, groundwater overdrafts in the basins continue. The need to 1) stop environmental damage caused by over-drafting; 2) the impact on small farmers and disadvantaged community members created by the lack of representation; and 3) the overall financial burden on taxpayers/ratepayers within the adjudicating groundwater basin must be addressed.

The state urgently needs to address policy issues. What happens in the building pictured above in 2025 may render SGMA moot. The historical requirements of the courts to determine a "safe yield" and impose a physical solution to address sustainability are no longer necessary in the era of SGMA. Parties have sufficient redress to challenge a GSP and its sustainability requirements through existing regulatory and legal proceedings.

LEGISLATIVE PROPOSAL

An Act relating to groundwater adjudication.

Amend Section 10726.6 of the Water Code to read as follows:

§10726.6. Action to determine validity of plan.

(a)

(1) A groundwater sustainability agency that adopts a groundwater sustainability plan may file an action to determine the validity of the plan pursuant to Chapter 9 (commencing with Section 860) of Title 10 of Part 2 of the Code of Civil Procedure no sooner than 180 days following the adoption of the plan.

(2) Notwithstanding any other provision of law, this provision shall be the sole venue and process for challenging the validity of any part or determination in an adopted groundwater sustainability plan, including, but not limited to, any technical information and/or technical findings including the determination of the Basin's safe and/or sustainable yield or the amount of groundwater in storage that may be safely extracted from the Basin. The information, findings and determinations in any part of an adopted groundwater sustainability plan, including, without limitation, a Basin's safe and/or sustainable yield may not be challenged in any other proceeding including a comprehensive adjudication.

(3) The court shall employ an abuse of discretion standard in reviewing any discretionary decisions, findings and/or determinations made by the groundwater sustainability agency, including but not limited to any technical information and/or technical findings in any part of an adopted groundwater sustainability plan, including the determination of the Basin's safe and/or sustainable yield or the amount of groundwater in storage that may be safely extracted from the Basin.

(4) This subdivision shall not apply to matters delegated to the department for evaluation under Section 10733 or regulations adopted pursuant to Section 10733.2

(5) The provisions set forth herein are reflective of existing law and shall apply to any comprehensive adjudication that has yet to become final.

(b) Subject to Sections 394 and 397 of the Code of Civil Procedure, the venue for an action pursuant to this section shall be the county in which the principal office of the groundwater management agency is located.

(b) Subject to Sections 394 and 397 of the Code of Civil Procedure, the venue for an action pursuant to this section shall be the county in which the principal office of the groundwater management agency is located.

(c) Any judicial action or proceeding to attack, review, set aside, void, or annul the ordinance or resolution imposing a new, or increasing an existing, fee imposed pursuant to Section 10730, 10730.2, or 10730.4 shall be commenced within 180 days following the adoption of the ordinance or resolution.

(d) Any person may pay a fee imposed pursuant to Section 10730, 10730.2, or 10730.4 under protest and bring an action against the governing body in the superior court to recover any money that the governing body refuses to refund. Payments made and actions brought under this section shall be made and brought in the manner provided for the payment of taxes under protest and actions for refund of that payment in Article 2 (commencing with Section 5140) of Chapter 5 of Part 9 of Division 1 of the Revenue and Taxation Code, as applicable.

(e) Except as otherwise provided in this section, actions by a groundwater sustainability agency are subject to judicial review pursuant to Section 1085 of the Code of Civil Procedure.

UNBACKED 02/06/25 06:51 PM

16022 RN 25 05677 PAGE 1

An act to amend Section 10726.6 of the Water Code, relating to water.

THE PEOPLE OF THE STATE OF CALIFORNIA DO ENACT AS FOLLOWS:

SECTION 1. Section 10726.6 of the Water Code is amended to read:

10726.6. (a) (1) A groundwater sustainability agency that adopts a groundwater sustainability plan may file an action to determine the validity of the plan pursuant to Chapter 9 (commencing with Section 860) of Title 10 of Part 2 of the Code of Civil Procedure no sooner than 180 days following the adoption of the plan.

(2) Notwithstanding any other law, and except as provided in paragraph (5), an action brought pursuant to this section shall be the sole venue and process for challenging the validity of any part of, or determination in, an adopted groundwater sustainability plan, including, but not limited to, the following:

(A) Technical information.

(B) Technical findings.

(C) Determinations of the basin's safe or sustainable yield and the amount of groundwater in storage that may be safely extracted from the basin.

(3) The information, findings, and determinations in any part of an adopted groundwater sustainability plan, including a basin's safe or sustainable yield, shall not be challenged in any other action or proceeding, including a comprehensive adjudication, except as provided in paragraph (5).

(4) The court shall employ an abuse of discretion standard in reviewing discretionary decisions, findings, or determinations made by the groundwater sustainability agency, including, but not limited to, subparagraphs (A), (B), and (C) of paragraph (2).

(5) Paragraphs (2) and (3) shall not apply to matters delegated to the department for evaluation pursuant to Section 10733 or regulations adopted pursuant to Section 10733.2.

(6) This subdivision shall apply to any comprehensive adjudication that has not been finalized as of the date they go into effect.

(b) Subject to Sections 394 and 397 of the Code of Civil Procedure, the venue for an action pursuant to this section shall be the county in which the principal office of the groundwater management agency is located.

(c) Any judicial action or proceeding to attack, review, set aside, void, or annul the ordinance or resolution imposing a new, or increasing an existing, fee imposed pursuant to Section 10730, 10730.2, or 10730.4 shall be commenced within 180 days following the adoption of the ordinance or resolution.

(d) Any person may pay a fee imposed pursuant to Section 10730, 10730.2, or 10730.4 under protest and bring an action against the governing body in the superior court to recover any money that the governing body refuses to refund. Payments made and actions brought under this section shall be made and brought in the manner provided for the payment of taxes under protest and actions for refund of that payment in Article 2 (commencing with Section 5140) of Chapter 5 of Part 9 of Division 1 of the Revenue and Taxation Code, as applicable.

(e) Except as otherwise provided in this section, actions by a groundwater sustainability agency are subject to judicial review pursuant to Section 1085 of the Code of Civil Procedure.

LEGISLATIVE COUNSEL'S DIGEST

Bill No.
as introduced, ______.
General Subject: Sustainable Groundwater Management Act: validation action.

Existing law, the Sustainable Groundwater Management Act, requires all groundwater basins designated as high- or medium-priority basins by the Department of Water Resources to be managed under a groundwater sustainability plan or coordinated groundwater sustainability plans, except as specified. Existing law requires the department to periodically review the groundwater sustainability plans developed by groundwater sustainability agencies pursuant to the act to evaluate whether a plan conforms with specified laws and is likely to achieve the sustainability goal for the basin covered by the plan. Existing law authorizes a groundwater sustainability agency that adopts a groundwater sustainability plan to file a court action to determine the validity of the plan no sooner than 180 days following the adoption of the plan, as provided.

This bill would provide that, except for certain matters delegated to the department for evaluation, an action to determine the validity of a groundwater sustainability plan shall be the sole venue and process for challenging the validity of any part of, or determination in, an adopted groundwater sustainability plan, including, but not limited to, technical information, technical findings, and determinations of the basin's safe or sustainable yield and the amount of groundwater in storage that may be safely extracted from the basin. The bill would require the court to employ an abuse of discretion standard in reviewing discretionary decisions, findings, or determinations made by the groundwater sustainability agency.

Vote: majority. Appropriation: no. Fiscal committee: yes. State-mandated local program: no.

FOX CANYON
GROUNDWATER MANAGEMENT AGENCY

A STATE OF CALIFORNIA WATER AGENCY

February 12, 2025

Revised to Update Item Number

Board of Directors
Fox Canyon Groundwater Management Agency
800 South Victoria Avenue
Ventura, CA 93009-1600

SUBJECT: Legal Services Agreement with Alana Rotter of Greines, Martin, Stein & Richland LLP to Represent the Agency in *City of Oxnard v. FCGMA* Appeals and Cross-Appeals – *(New Item)*

RECOMMENDATION: Approve, and ratify the Interim Executive Officer's execution of, a legal services agreement with Greines, Martin, Stein & Richland LLP (GMSR) for Ms. Alana Rotter's representation of the Agency in *City of Oxnard v. FCGMA* appeals and cross-appeals.

DISCUSSION:
The Agency is currently defending a lawsuit filed by the City of Oxnard (Oxnard) that seeks, among other things, a writ of mandate challenging the Agency's "An Ordinance to Establish an Allocation System for the Oxnard and Pleasant Valley Groundwater Basins" (OPV Allocation Ordinance). (See *City of Oxnard v. Fox Canyon Groundwater Management Agency*, Second App. Dist. Civil Case No. B342228.) The OPV Allocation Ordinance was adopted by your Board in October 2020 to establish pumping allocations in the Oxnard Pleasant Valley Basin (OPV Basins) to comply with the Sustainable Groundwater Management Act's (SGMA) mandate that the basins be managed sustainably by 2040. Following a trial court decision, where the Agency prevailed in part and lost in part, Oxnard appealed and the Agency cross-appealed. The Agency cross-appealed to ensure a complete appellate review of the trial court's decision on the merits. The Agency also appealed the trial court's award of certain attorney's fees and costs.

Special appellate counsel is needed to represent the Agency in the *Oxnard v. FCGMA* appeals and cross-appeal. This case involves complicated legal issues related to the validity of the OPV Allocation Ordinance and the Agency's regulatory authority. Further, the complexity of issues has been compounded by the posture of the proceedings, which include multiple rounds of briefings, hearings, and decisions at the trial court level, and now appeals and cross-appeals of the trial court's decision on the merits and award of certain attorney's fees and costs to Oxnard. Ms. Rotter has extensive experience representing clients in California appellate court proceedings, including representing public entities in cases involving constitutional law, regulatory claims, and government tort liability. Ms. Rotter and GMSR are ideally suited to represent the Agency in these complex appellate proceedings.

On December 17, 2024, the Interim Executive Officer executed a legal services agreement with Ms. Rotter and GMSR to represent the Agency in the appellate proceedings of this case. (See Exhibit *22A*. *Revised to update Exhibit number.*) In the trial court, the Agency was represented by Stoel Rives LLP. Ms. Rotter and GMSR have substituted in to represent the Agency in the appellate proceedings. If your Board approves the recommended action, Ms. Rotter and GMSR will continue to serve as special appellate counsel representing the Agency in the appellate proceedings of the *Oxnard v FCGMA* case.

CONCLUSION:
It is recommended that your Board approve, and ratify the Interim Executive Officer's execution of, the attached legal services agreement with GMSR for Alana Rotter's representation of the Agency on the *City of Oxnard v. FCGMA* appeals and cross-appeals.

This letter has been reviewed by Agency Counsel. If you have any questions, please call me at (805) 654-3942.

Sincerely,

Arne Anselm
Interim Executive Officer

Attachment:

Exhibit *22A* - Legal Services Agreement with GMSR, executed December 17, 2024. *Revised to update Exhibit number.*

GMSR
APPELLATE LAWYERS

AUTHOR'S EMAIL ADDRESS:
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December 17, 2024

Via Email: Jason.Canger@ventura.org

Jason Canger
Ventura County Counsel's Office
800 South Victoria Avenue, 4th Floor, L#1830
Ventura, CA 93009

Re: ***City of Oxnard v. Fox Canyon Groundwater Management Agency***
Los Angeles Superior Court Case No. 20STCP00929
Court of Appeal Case No. B342228

Dear Jason:

Thanks for choosing Greines, Martin, Stein & Richland LLP as Fox Canyon Groundwater Management Agency's appellate counsel in the above captioned appeal. This letter sets forth the terms and conditions that apply to our representation of Fox Canyon Groundwater Management Agency ("Agency" or "you"), for all services performed and costs incurred both before and after execution of this letter. We will not be obligated to perform any services until the letter is fully executed. Please read this letter carefully, as it is the contract that governs our attorney-client relationship.

1. Scope of the Representation.

Our representation encompasses the merits appeal/cross-appeal, and the attorney fee appeal in the above-captioned case. Initially, we will advise you on appellate procedural matters including a proposed briefing sequence and, in consultation with you and your trial counsel, we will review the record and conduct legal research to analyze whether there are meritorious arguments available. If we determine there are meritorious arguments, we will prepare and file appellate briefs and appendices; present oral argument; and, if appropriate, seek or resist rehearing in the Court of Appeal and review in the California Supreme Court. We will appear of record in the Court of Appeal, and will have ultimate responsibility for, and final decision-making power regarding, the form and content of all briefs and other documents filed in any appellate court.

Unless otherwise agreed in writing, we will not appear as counsel of record in the trial court. Your trial counsel has exclusive responsibility for representing you in that court.

You will be our sole client, and our representation does not encompass any other type of legal work, advice, or counsel, unless we so agree in writing.

2. Fees.

Our fees will be calculated on an hourly basis based on time actually expended. Time is billed in minimum increments of one-tenth (0.1) of an hour. The hourly rate for senior partners will be $850. The rates for other partners will be $750. Lawyers designated Counsel will be billed at $650 per hour. Associate rates will be $525-$575.

Appellate fellow rates will be $350 per hour for substantive legal work, and $200 per hour for cite-checking and proofreading our draft briefs. Our appellate fellows are members of the California bar who are in their first two years of practice or law school graduates awaiting bar results.

We generally increase our rates at the beginning of each calendar year, with the increase reflected on our February invoice for January services. We will give 30 days' notice of such annual rate increases. We reserve the right to adjust our rates at other times instead, with 30 days advance written notice.

If we agree to perform services beyond the scope of representation set forth in Paragraph 1, the fee arrangement, if not otherwise agreed upon at the time, will be based upon the firm's hourly rates at the time we perform that work.

3. Costs.

In addition to our fees, you will pay all reasonable and appropriate expenses we incur on your behalf. These include filing fees, travel costs, printing costs, commercial messengers and the like at our actual cost; document digitization services by outside vendors at our actual cost; and secretarial overtime when required by your needs at our actual cost.

We will generally advance day-to-day costs on your behalf, and you will reimburse us for them. For significant cost items, however, we may require that you either provide us with advance payment or pay the vendor directly.

4. Billing and Payment.

We will send you invoices at the email address on page 1. Our invoices will state the services rendered; the attorney or appellate fellow rendering the services; the amount charged for the services at the applicable hourly rate; and any costs incurred. We generally issue invoices monthly, but we may do so at different intervals, shorter or longer, as circumstances warrant. Each bill is reviewed by a partner for reasonableness before it is sent.

Our invoices are due and payable immediately, and prompt payment is an essential element of our bargain. Beginning on the 30th day after the date of each invoice, we will charge interest at 10% per year. Failure to pay the firm's invoices when due is cause for us to withdraw as your counsel in accordance with California Rules of Professional Conduct, rule 1.16.

Because our clients' satisfaction with both the quality of our work and the reasonableness of our bills is of the utmost importance to us, we welcome a call to discuss and promptly resolve any question, comment, or concern.

5. Fee Deposit.

No fee deposit will be required at this time. However, we reserve the right to require a fee deposit in the future should the needs of the case require it.

6. Cooperation.

You agree to cooperate fully with us by promptly responding to our inquiries and promptly supplying all information and documents we request in connection with our representation. You also agree to update us concerning any changed circumstances (including any change of contact information) that could impact our representation of you.

7. Professional Liability Insurance Disclosure.

Our firm carries professional liability insurance.

8. No Guarantee of Outcome or Fee Estimates.

We do not and cannot guarantee the outcome in any matter. Any comments about the outcome of your matter are expressions of opinion only.

The adversarial nature of litigation and counsel's inability to control the actions of opposing counsel or the courts make it impractical to determine with certainty the total amount of work necessary to complete this matter. We have made no promise about the total amount of fees and costs that will be required to see your matter through to conclusion.

9. No Assertion of Meritless Claims.

We specialize in handling appeals and related proceedings, and we believe that we have developed an outstanding reputation in the appellate courts and bar for appellate work of the highest quality. In order to maintain that reputation, we are committed never to pursue any issue that, in our sole judgment, lacks arguable merit. Accordingly, we reserve the right to refuse to file a brief or participate in asserting an argument that we believe contains a meritless or unsupported claim.

10. Termination.

Our representation terminates upon completion of the matters set forth in Paragraph 1, unless otherwise agreed. You are free to terminate our services at any time. We are free to terminate our representation of you at any time, in accordance with Rule of Professional Conduct 1.16.

Rule 1.16 permits us to withdraw from representing you under various circumstances, including for example, if your conduct makes it unreasonably difficult for us to carry out the representation effectively or if you fail to pay our fees and costs in accordance with this agreement.

If you terminate our representation or if we withdraw from the representation, you will remain obligated to pay us our fees for all services we have provided up to that time and to reimburse us for all costs we have advanced on your behalf.

11. Applicable Law; Dispute Resolution.

This letter agreement and any disputes arising out of or relating to it will be governed by and construed in accordance with California law.

If any dispute arises between us, including, but not limited to, disputes over billing, fees, claimed malpractice, or any other complaints, and we cannot resolve the dispute informally, we both agree that the dispute shall next be submitted to mediation. Both parties agree to use their best efforts to promptly and thoroughly mediate any such dispute, with each party sharing equally in the cost of a mutually agreeable mediator. Only if mediation is unsuccessful may either party then pursue relief in Los Angeles Superior Court. You are also free to utilize the fee arbitration procedures set forth in California Business & Professions Code section 6200 *et seq*.

12. Client File.

The client file generated during our representation of you belongs to you. At the conclusion of our representation, including by withdrawal, and subject to any restrictions that may arise from the existence of a confidentiality or protective order, you are entitled to receive your client file upon request. You agree that an electronic or digital copy of your file is sufficient, and that we need not maintain a paper copy of the file. If you wish to receive the client file, you agree to notify us in writing. We will maintain a digital copy of the file for five years, after which we may, in our discretion, destroy the file without further notice.

13. Miscellaneous.

This Agreement is the entire agreement between the parties. This Agreement may be modified only by a later written agreement signed by all parties. If any provision of this Agreement is held in whole or in part to be unenforceable for any reason, that portion will be severable, and the remainder of that provision and of the entire Agreement will remain in effect.

In executing this Agreement neither party has relied upon any inducements, promises or representations made by the other party, outside of the explicit provisions of this Agreement. By signing below, you represent that: (A) you have asked, and we have answered, any questions you have about the terms of our representation, and (B) you have had the opportunity to consult with independent legal counsel concerning the terms of our representation, and you either did so or voluntarily decided not to do so.

This Agreement shall be binding upon, and shall inure to the benefit of, each party's respective heirs, legal representatives, successors, and assigns. By signing below, the signatory warrants possession of authority to enter into this agreement on behalf of Fox Canyon Groundwater Management Agency. A PDF of the fully signed agreement shall be deemed an original, and authorized electronic signatures shall suffice.

14. Conclusion.

If this Agreement is acceptable to you, please sign it and return it to us via a digitally signed or scanned PDF. As noted above, our representation of you will begin only upon our receipt of a fully signed copy of this agreement.

You should keep a copy of the signed agreement for your files. If you discover that you do not have a fully executed copy of this agreement, please let us know and we will provide one to you.

We look forward to working with you.

Very truly yours,

Alana H. Rotter

Agreed:

By:____________________ **Date:** 12-17-24

Arne Anselm
Interim Executive Officer

On behalf of: Fox Canyon Groundwater Management Agency

FOX CANYON GROUNDWATER MANAGEMENT AGENCY

DIRECTORS

Eugene F. West (Chair) – Small Water Districts (805) 657-2121 *(Term Exp 2-28-27)*
Executive Committee, Fiscal Committee

Kelly Long (Vice Chair) – Ventura County Board of Supervisors (805) 654-2276 *(Term Exp 2-28-27)*
Executive Committee

Michael Craviotto – Farming Interests (805) 766-9602 *(Term Exp 2-28-26)*
Operations Committee, Flynn Award Selection Subcommittee

Lynn Maulhardt – United Water Conservation District (805) 982-0780 *(Term Exp 2-28-26)*
Operations Committee

Tony Trembley – Five Cities (805) 388-5307 *(Term Exp 2-28-26)*
Fiscal Committee, Flynn Award Selection Subcommittee

ALTERNATE DIRECTORS

Reddy Pakala – Small Water Districts (805) 990-6809 *(Term Exp 2-28-27)*

David Borchard – Farming Interests (805) 485-3525 *(Term Exp 2-28-26)*

Vianey Lopez – Ventura County Board of Supervisors (805) 654-2613 *(Term Exp 2-28-27)*

Bert Perello – Five Cities (805) 240-6194 *(Term Exp 2-28-26)*

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Raya Nour – Engineer II (805) 654-2454

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Fatima Perez – Management Assistant (805) 650-4073

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Briana Barajas – Water Resources Specialist (805) 654-2021

Elka Weber – Clerk of the Board (805) 654-2014