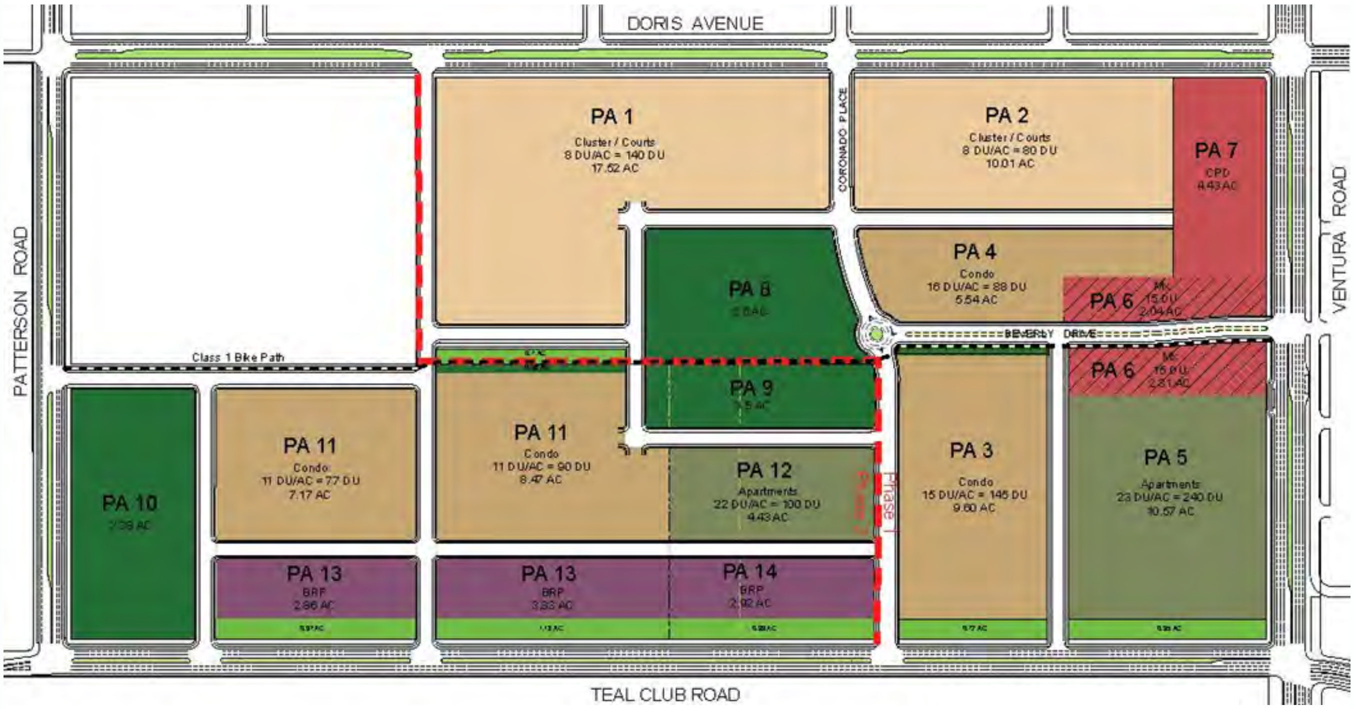
Appendix J

Water Supply Assessment

REVISED FINAL DRAFT
WATER SUPPLY ASSESSMENT
TEAL CLUB DEVELOPMENT

OCTOBER 2019



Prepared for:

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Ventura, CA

Prepared by:

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WATER SUPPLY ASSESSMENT
TEAL CLUB DEVELOPMENT

OCTOBER 2019

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LIST OF FREQUENTLY USED ACRONYMS AND ABBREVIATIONS

AF	acre-feet
AFY	acre-feet per year
AWPF	Advanced Water Purification Facility
BGS	below ground surface
CEQA	California Environmental Quality Act
City	City of Oxnard
CMWD	Calleguas Municipal Water District
County	County of Ventura
DDW	Division of Drinking Water (SWRCB)
DWR	California Department of Water Resources
FCGMA	Fox Canyon Ground water Management Agency
gpcd	gallons per capita per day
gpd/ft^2	gallons per day per square foot
gpm	gallons per minute
GREAT	Ground water Recovery Enhancement and Treatment
IRP	Integrated Resources Program
LAS	lower aquifer system
LRP	Local Resources Program
LTCP	Long Term Conservation Plan
MAF	million acre feet
MGD	million gallons per day
MWDSC	Metropolitan Water District of Southern California (also "Metropolitan")
NBVC	Naval Base Ventura County
O-H	Oxnard-Hueneme Pipeline System
OWWTP	Oxnard Wastewater Treatment Plant
PHWA	Port Hueneme Water Agency
Project	Teal Club Project
SB	Senate Bill
sq.ft.	square feet
SWP	State Water Project (State of CA)
SWRCB	State Water Resources Control Board
TDS	total dissolved solids
UAS	upper aquifer system
USEPA	United States Environmental Protection Agency
UWCD	United Water Conservation District (or District)
UWMP	Urban Water Management Plan
WSA	Water Supply Assessment.

SECTION 1: INTRODUCTION

1.1 Purpose of Water Supply Assessment

Milner-Villa Consulting was contracted to prepare a Water Supply Assessment (WSA) for the proposed Teal Club Development (Project) located in the City of Oxnard, Oxnard, California. In addition, this WSA was prepared to partially satisfy the requirements of California Water Code and to supplement the Project Draft Environmental Impact Report (EIR).

The purpose of this Water Supply Assessment is to determine if sufficient water supplies are available to meet the proposed water demands of the proposed Teal Club Development. This assessment has been prepared in accordance with the requirements of SB 610. Senate Bill 610 (Costa), an amendment to California Law (Public Resources Code Section 21151.9, Water Code Sections 10631, 10656, 10657, 10910-10915), places additional requirements upon the local water agencies and or planning agencies regarding land use planning and water supply availability. A copy of California Water Code Section 10910-10915 is provided in Appendix A.

SB 610 requires cities and counties, which determine if a project is subject to the California Environmental Quality Act, to identify any public water system that may supply water for a project. The cities and counties may request those public water systems to prepare a project-specific water supply assessment to be included in any environmental document prepared for a project. This assessment must include, among other information, an identification of existing water supply entitlements, water rights, or water service contracts relevant to the identified water supply for the proposed project and water received in prior years pursuant to those entitlements, rights, and contracts. If the assessment concludes that water supplies are or will be insufficient, the public water system must submit plans for acquiring additional water supplies.

SB 610 took effect on 1 January 2002 and requires that water agencies and or planning agencies demonstrate that sufficient and reliable sources are available in order for local agencies to approve large-scale developments and complete the environmental review process for projects. Water Code Section 10912 requires a Water Supply Assessment for several types of proposed projects, including "...a proposed residential development of more than 500 dwelling units (Water Code, Section 10912.a.5)". The proposed Project includes a mixed-use development plan including up to 990 residential units. Based upon the criteria defining a project under Water Code, Section 10912.a.5, the proposed Project meets the intent of the law, thus the Project requires a Water Supply Assessment.

In general, water supply assessments are prepared utilizing data and information from local UWMPs and other relevant sources. This Water Supply Assessment was prepared in October 2019 using available information known at the time of the preparation of this document.

1.2 Teal Club Project

1.2.1 Project Location

The Project area is located in southern California, within an unincorporated area of Ventura County adjacent to the City of Oxnard (City), and within the City's Sphere of Influence and City Urban Restriction Boundary (CURB) lines (see Figure 1-1). The proposed Teal Club Specific Plan Area comprises approximately 150 acres (gross) generally bounded by Doris Avenue on the north, Patterson Road on the west, Teal Club Road on the south, and Ventura Road on the east (see Figure 1-2).

1.2.2 Project Description

The proposed Project by Borchard Ownership Interests (Project Proponents) will involve annexation of the approximately 150-acre (gross) project area to the City, and adoption of an updated Teal Club Specific Plan (in progress). Current Ventura County General Plan land use and zoning designations for the project area are Agricultural and Agricultural Exclusive. The proposed Teal Club Specific Plan designates residential, retail commercial, business/research park, parks, and public facilities uses (see Figure 1-2). A central focus of this development will be in the provision of balanced community with jobs, recreation, shopping, and affordable and market-rate housing. The 2030 General Plan land use map designates the project site for an Urban Village, thereby encouraging neo-traditional town planning with a focus on sustainability and transit-oriented development.

The Project Proponents propose to complete one of three versions of the Teal Club Project. The three versions are named “Project”, “Reduced Intensity Alternative”, and “Phase 1 Development Only Alternative”. Each of these versions are summarized below.

The “Project” will include the following major components:

- Approximately 150 total acres
- Up to 990 residential units in a variety of densities and product types on approximately 73 acres
- Up to 132,000 square feet of light industrial development on approximately 9 acres
- Up to 60,000 square feet of retail commercial uses on approximately 9 acres
- Approximately 18 acres of community park space, pocket parks, and greenbelts
- Approximately 41 acres of roadways and storm water detention basins.

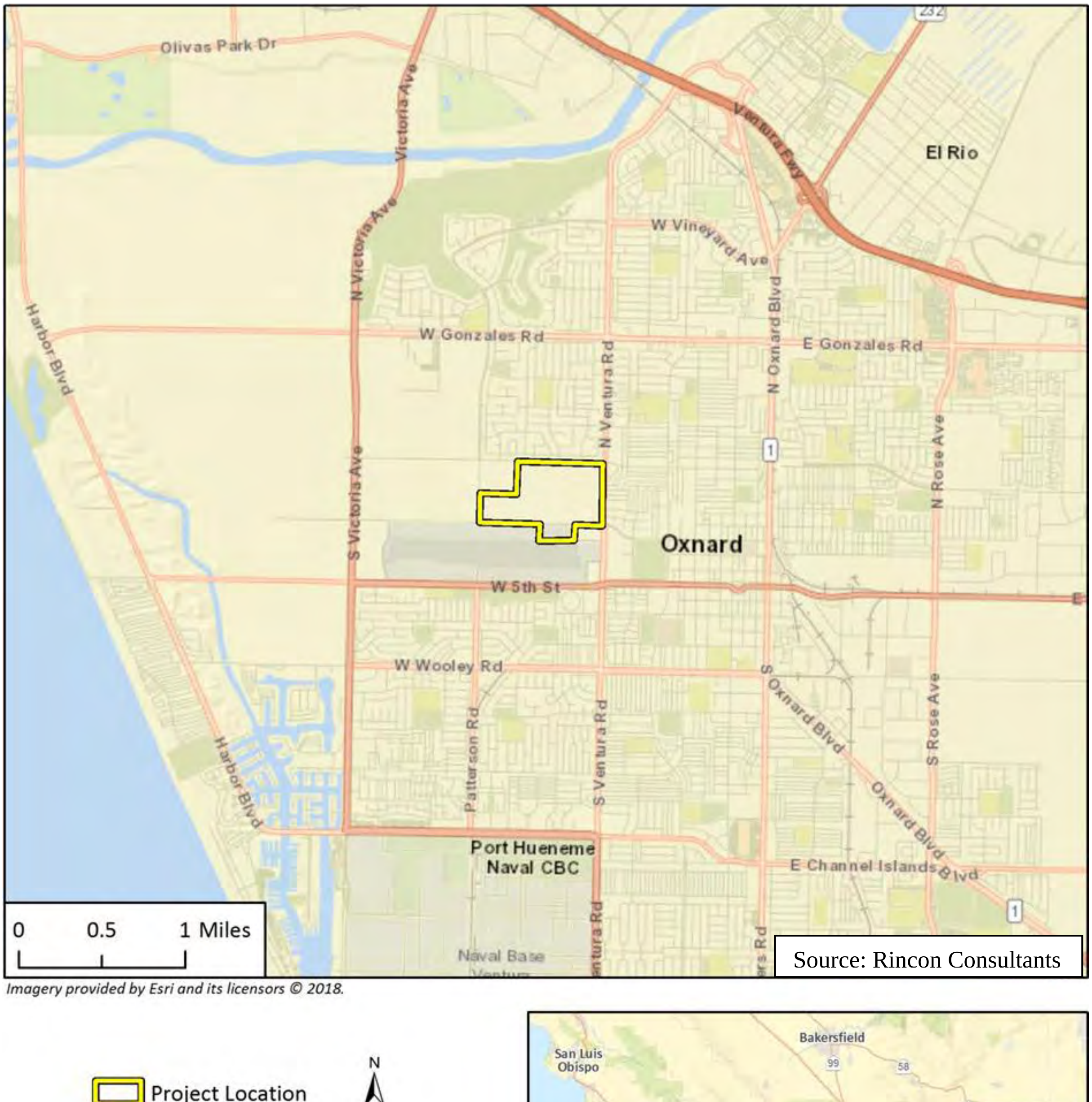
The “Reduced Intensity Alternative” will include the following major components:

- Approximately 150 total acres
- Up to 990 residential units in a variety of densities and product types on approximately 86 acres
- Up to 50,000 square feet of retail commercial uses on approximately 9 acres
- Approximately 18 acres of community park space, pocket parks, and greenbelts
- . Approximately 38 acres of roadways and storm water detention basins.

The “Phase 1 Development Only Alternative” will include the following major components:

- Approximately 92 total acres
- Up to 723 residential units in a variety of densities and product types on approximately 53 acres
- Up to 60,000 square feet of retail commercial uses on approximately 9 acres
- Approximately 6.5 acres of park space and greenbelts
- Approximately 23 acres of roadways and storm water detention basins.

The proposed Project will require review by other agencies including the Ventura County Airport Land Use Commission, California Division of Aeronautics, City of Oxnard, and the Ventura County Local Agency Formation Commission. The State Water Resources Control Board, Division of Drinking Water will be responsible for regulatory approvals for drinking water supply and water quality for the Project. The Fox Canyon Groundwater Management Agency will be responsible for approval of the transfer of ground water extraction allocations from the property owner to the City. The City will be responsible for delivery of water and recycled water to the Project.



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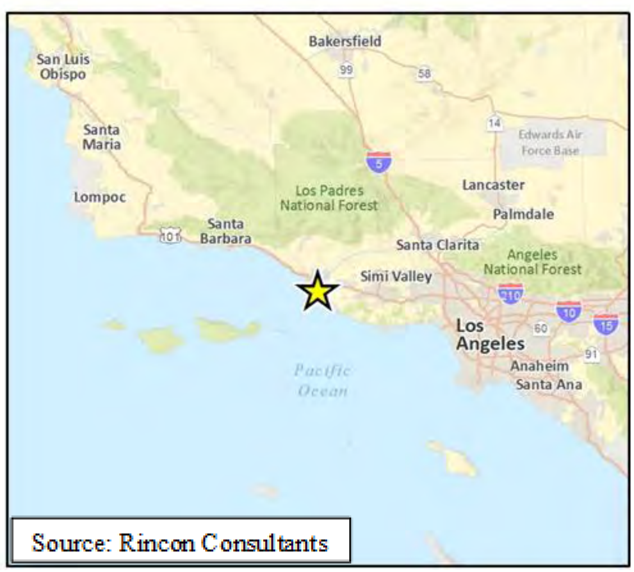

FIGURE 1-1
PROJECT VICINITY

FIGURE 1-2
PROJECT SITE PLAN

Source: Rincon Consultants

1.2.3 Project Status

This Project is required to prepare an Environmental Impact Report (EIR) in accordance with the City of Oxnard requirements and California Environmental Quality Act (CEQA; Public Resources Code § 21000 et seq.). A Draft EIR dated 2015 is available for the Project (prepared by Rincon Consultants). The Final EIR is anticipated to available in the fourth quarter of 2019.

1.3 Area Characteristics

The Project is located in Ventura County. Rugged mountainous terrain covers most of the northern Ventura County while broader alluvial valleys and lower rolling topography occur in the southern portions of the County. Mountainous areas to the north rise to elevations in excess of 6,000 feet above mean sea level. Ground surface elevations vary from about 60 to 150 feet above mean sea level on the Oxnard Plain and from about 15 to 250 feet above mean sea level in Pleasant Valley (Oxnard, 2004). The Santa Clara River watershed runs 84 miles from the Pacifico Mountain to the estuary. The Santa Clara River drains an area of 1,634 square miles including most of northern Ventura County (60 percent of watershed) and northwestern Los Angeles County (40 percent of watershed). Nearly 90 percent of this drainage area is characterized by rugged topography, while the remainder consists of flatter valley floor and coastal plain topography.

The Project is located about 60 miles northwest of Los Angeles along a beautiful stretch of the Pacific Ocean coastline in western Ventura County and adjacent to the City of Oxnard. Oxnard is the largest city within Ventura County, and the center of a regional agricultural industry and a progressive business center. In addition, Oxnard is a relaxed seaside destination with a variety of neighborhoods and community services. Bordered by mountains and the Pacific Ocean, western Ventura County provides a seaside environment with expansive mountain views. Oxnard incorporates both of these attributes through its pattern of relatively compact urban development focused on the downtown, coastline and harbor, and the Highway 101 corridor. The moderate Mediterranean climate, fertile topsoil, and generally adequate ground water supply lead to year-round agricultural production in the surrounding Oxnard Plain (Oxnard, 2011).

Adjacent communities include the cities of San Buenaventura, Port Hueneme, and Camarillo. Naval Base Ventura County, consisting of Naval Air Station Point Mugu and Construction Battalion Center Port Hueneme is located to the south of Oxnard. The Oxnard Plain is bordered by mountains with numerous public recreation areas while the Channel Islands National Park (generally located off the coast) frames the western horizon.

The 150-acre proposed Teal Club Project is in the western portion of Ventura County, in the western part of the City of Oxnard, north of the Oxnard Airport. The Plan Area is located within an unincorporated area of Ventura County adjacent to the City of Oxnard, and within the City of Oxnard's Sphere of Influence and City Urban Restriction Boundary lines. The Plan Area comprises five contiguous assessor’s parcels generally bounded by Doris Avenue on the north, Patterson Road on the west, Teal Club Road on the south, and Ventura Road on the east. The additional annexation area comprises nine assessor’s parcels on the south side of Teal Club Road, north and west of Little Farms Road and bisected by Mallard Way. Additional details regarding the assessor parcel numbers for the Plan Area and the proposed additional annexation area are provided in the Draft EIR (in progress). Regional access to the site is provided by the Ventura Freeway (U.S. Highway 101) and the Pacific Coast Highway (State Route 1).

The Plan Area is in active agricultural use, currently cultivated with irrigated row crops. There are several agricultural accessory buildings in the proposed Plan Area, the largest being a barn and greenhouses in the central-southern portion along Teal Club Road. The Plan Area also supports two single family residences, one just east of the barn and one in the northeastern corner of the site at Doris Avenue and North Ventura Road. The additional parcels to be annexed south of Teal Club Road are a mix of vacant land (the westernmost three parcels) and residential and industrial development (the easternmost six parcels).

1.4 Population and Demographics

The City of Oxnard has a mix of housing types, including single-family residences and multiple-family residences. Residential customers represent the largest category of water users in terms of accounts and volume purchased. According to the 2010 U.S. Census, there was a population of approximately 198,000 persons within the City service area. According to the City's UWMP (2016), the estimated City population for 2015 is 193,654 (Oxnard, 2016). The UWMP includes the following population projections:

- 2020: 220,248
- 2025: 229,622
- 2030: 238,996
- 2035: 248,370
- 2040: 257,744.

1.5 Local Climate

The Project site is located adjacent to the City of Oxnard. The City is located within the Oxnard Plain, which has a mild Mediterranean style climate, with cool wet winters and mild, dry summers. Temperatures only rarely fall below freezing in winter. Annual average monthly temperatures range from a high of 75.3ºF (September) to low of 44.0ºF (January). See Table 1-1 for details. Annual average precipitation is approximately 13.9 inches per year (see Table 1-1 for details), of which most occurs during the winter season (November to March).

TABLE 1-1
MONTHLY CLIMATE DATA FOR RAINFALL and TEMPERATURE

Parameter (a)	**Jan**	**Feb**	**Mar**	**Apr**	**May**	**Jun**	
Average Rainfall (in)	3.11	3.21	2.32	1.04	0.19	0.07	
Average Max Temperature (ºF)	65.9	66.1	66.8	68.3	69.5	71.5	
Average Min Temperature (ºF)	44.0	44.7	46.0	48.0	51.1	54.2	
Parameter (a)	**Jul**	**Aug**	**Sept**	**Oct**	**Nov**	**Dec**	**Annual**
Average Rainfall (in)	0.02	0.05	0.20	0.48	1.43	2.43	**13.9**
Average Max Temperature (ºF)	74.4	75.1	75.3	74.2	71.3	66.5	**70.4**
Average Min Temperature (ºF)	57.3	57.8	56.4	52.6	47.6	44.3	**50.2**

Notes:
(a) Temperature and rainfall data obtained from National Weather Service Office, Oxnard, CA.

Additional details regarding potential impacts of climate change on water demands and water resources are provided in Sections 2, 3, and 4.

1.6 Review of Local Urban Water Management Plans

SB 610 provides that if the projected water demand associated with the proposed project was accounted for in the Urban Water Management Plan (UWMP), or if the UWMP includes information applicable to the proposed project, then relevant information from that document may be incorporated into the SB 610 water supply assessment.

The City of Oxnard (City) adopted its current UWMP in May 2016 (Oxnard, 2016). The City will supply potable water to the Project. Information in the City UWMP relevant to this Water Supply Assessment will be identified and incorporated into this Assessment. Relevant information in the City UWMP (2016) includes, but is not limited to, the following:

- City currently supplies water to 41,514 service connections including residential, commercial, and industrial customers.
- City's current and future water supplies include imported State Water Project (SWP) water and treated ground water.
- City also distributes recycled water to customers within the City's service area.
- City water demand in 2015 is 25,423 acre-feet per year (AFY) including sales for municipal, commercial, industrial, agriculture, and system losses.
- City estimates a normal water-year demand of 52,225 AFY for the year 2040.
- City estimates ground water pumping or purchase of ground water of 28,515 AFY by 2040
- City estimates purchase of imported surface water of 11,826 AFY for the year 2040
- City estimates recycled water sales of 14,000 AFY for the year 2040.

1.7 Report Organization

The remainder of this Water Supply Assessment is organized as follows:

- Section 2 – Water Supply
- Section 3 – Water Demand
- Section 4 – Water Supply Reliability
- Section 5 – Summary and Conclusions.

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SECTION 2: WATER SUPPLY

2.1 WSA Requirement

The WSA must comply with the following California Water Code requirements:

> 10910(b) The city or county, at the time that it determines whether an environmental impact report, a negative declaration, or a mitigated negative declaration is required for any project subject to the California Environmental Quality Act pursuant to Section 21080.1 of the Public Resources Code, shall identify any water system that is, or may become as a result of supplying water to the project identified pursuant to this subdivision, a public water system, as defined in Section 10912, that may supply water for the project. If the city or county is not able to identify any public water system that may supply water for the project, the city or county shall prepare the water assessment required by this part after consulting with any entity serving domestic water supplies whose service area includes the project site, the local agency formation commission, and any public water system adjacent to the project site.
>
> (d) (1) The assessment required by this section shall include an identification of any existing water supply entitlements, water rights, or water service contracts relevant to the identified water supply for the proposed project, and a description of the quantities of water received in prior years by the public water system, or the city or county if either is required to comply with this part pursuant to subdivision (b), under the existing water supply entitlements, water rights, or water service contracts.
> (2) An identification of existing water supply entitlements, water rights, or water service contracts held by the public water system, or the city or county if either is required to comply with this part pursuant to subdivision (b), shall be demonstrated by providing information related to all of the following:
> (A) Written contracts or other proof of entitlement to an identified water supply.
> (B) Copies of a capital outlay program for financing the delivery of a water supply that has been adopted by the public water system.
> (C) Federal, state, and local permits for construction of necessary infrastructure associated with delivering the water supply.
> (D) Any necessary regulatory approvals that are required in order to be able to convey or deliver the water supply.
>
> (f) If a water supply for a proposed project includes ground water, the following additional information shall be included in the water supply assessment:
> (1) A review of any information contained in the urban water management plan relevant to the identified water supply for the proposed project.
> (2) A description of any ground water basin or basins from which the proposed project will be supplied. For basins that have not been adjudicated, information as to whether the department has identified the basin or basins as overdrafted or has projected that the basin will become overdrafted if present management conditions continue, in the most current bulletin of the department that characterizes the condition of the ground water basin, and a detailed description by the public system, or the city or county if either is required to comply with this part pursuant to subdivision (b), of the efforts being undertaken in the basin or basins to eliminate the long-term overdraft condition.
> (3) A detailed description and analysis of the amount and location of ground water pumped by the public water system, or the city or county if either is required to comply with this part pursuant to subdivision (b), for the past five years from any ground water basin from which

the proposed project will be supplied. The description and analysis shall be based on information that is reasonably available, including, but not limited to, historic use records.
(4) A detailed description and analysis of the amount and location of ground water that is projected to be pumped by the public water system, or the city or county if either is required to comply with this part pursuant to subdivision (b), from any basin from which the proposed project will be supplied. The description and analysis shall be based on information that is reasonably available, including, but not limited to, historic use records.
(5) An analysis of the sufficiency of the ground water from the basin or basins from which the proposed project will be supplied to meet the projected water demand associated with the proposed project. A water supply assessment shall not be required to include the information required by this paragraph if the public water system determines, as part of the review required by paragraph (1), that the sufficiency of ground water necessary to meet the initial and projected water demand associated with the project was addressed in the description and analysis.

2.2 Project Water Supplies

The Project site is currently in active agriculture use with row crops. The primary source of water for the Project site is ground water produced by several private agricultural wells located on the property. Project Proponents anticipate annexing to the City of Oxnard. Figure 2-1 provides a graphical summary of the City service area. The Project will connect to City drinking water infrastructure available nearby within Ventura Road. The City's current water supply consists of City ground water, purchased ground water, and imported surface water. The City blends water from these three sources to achieve an appropriate balance between water quality, quantity, reliability, and cost. In addition, the City will provide recycled water to the Project site for non-potable demands. Each of these sources of supply are summarized below.

2.3 Local Ground Water

2.3.1 Santa Clara River Watershed Overview

The ground water sources of supply for the City of Oxnard include ground water from the City's wells and purchases the UWCD, drawn from two basins referred to locally as the Oxnard Forebay Ground Water Basin and the Oxnard Plain Ground Water Basin. These Basins are important elements of the extensive ground water basins of Ventura County (see Figure 2-2). The Oxnard Forebay Ground Water Basin and the Oxnard Plain Ground Water Basin are both located in the Oxnard Subbasin of the Santa Clara River Valley Ground Water Basin (Ground Water Basin Number 4-4.02), as identified in California Department of Water Resources (DWR) Bulletin 118 (DWR, 2006). Ground water currently comprises approximately 58 percent of the City's water supply (Oxnard, 2016). Additional details regarding local ground water basins are provided in the following sections.

The Santa Clara River, which drains the headwaters of the mountainous areas of northern Ventura County and northwestern Los Angeles County, is the largest river system in Southern California that remains in a relatively natural state. The Santa Clara River watershed runs generally in a western direction for 84 miles from the Pacifico Mountain to the estuary near Ventura Harbor (see Figure 2-3). The Santa Clara River drains an area of 1,634 square miles including most of northern Ventura County (60 percent of watershed) and northwestern Los Angeles County (40 percent of watershed).

Nearly 90 percent of this drainage area is characterized by rugged topography to the north and east of the river including portions of the San Gabriel Mountains, the Sierra Pelona, and the Topatopa Mountains of the Sespe back-country to headwaters near Pine Mountain and Mt. Pinos, and the Santa Susana Mountains, Oak Ridge, and South Mountain to the south of the river. Much of this area is in the Angeles National Forest and Los Padres National Forest (WCVC, 2014).

Source: City of Oxnard, 2012.

FIGURE 2-1
CITY OF OXNARD WATER SERVICE AREA

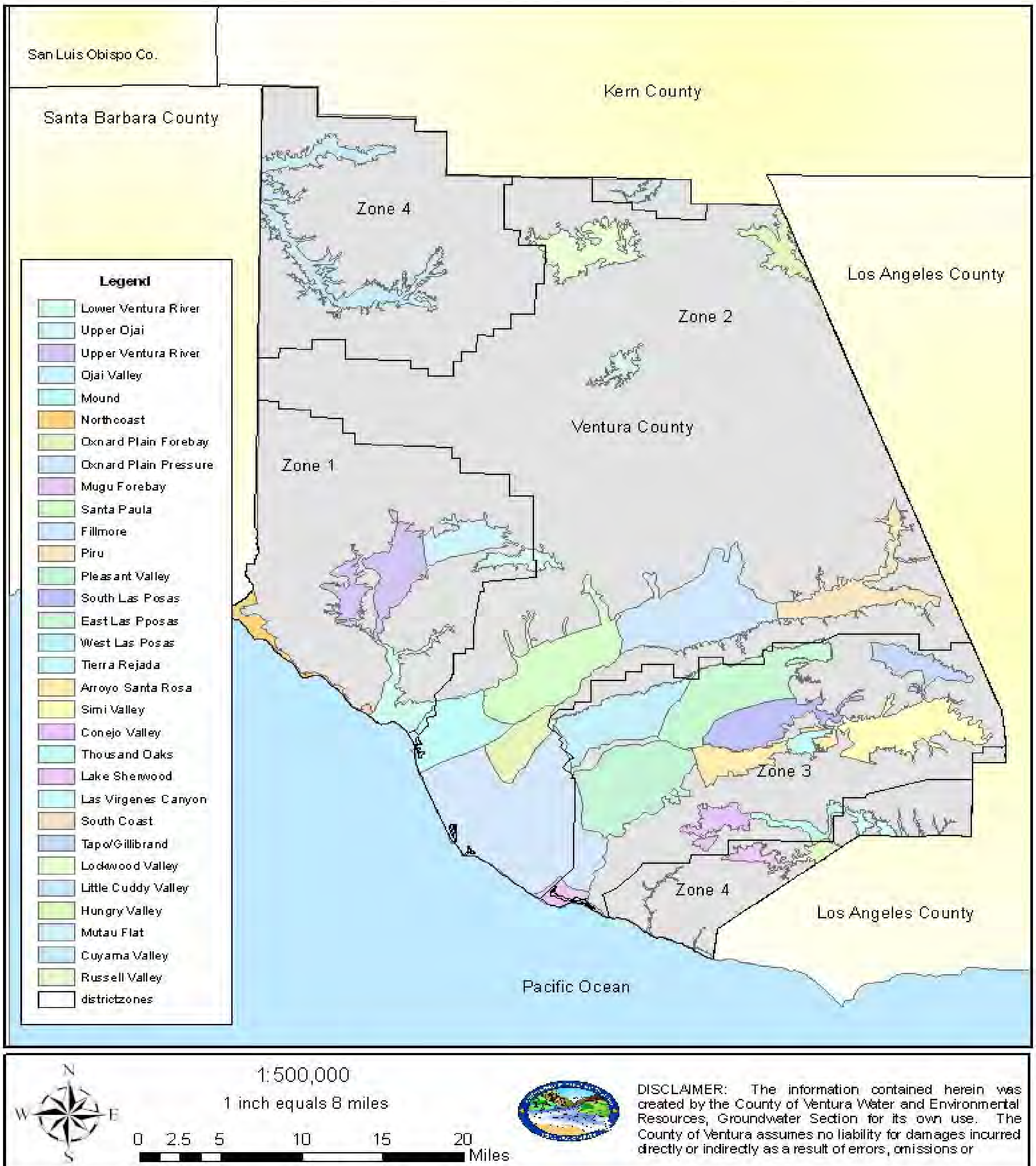


FIGURE 2-2
GROUND WATER BASINS OF VENTURA COUNTY

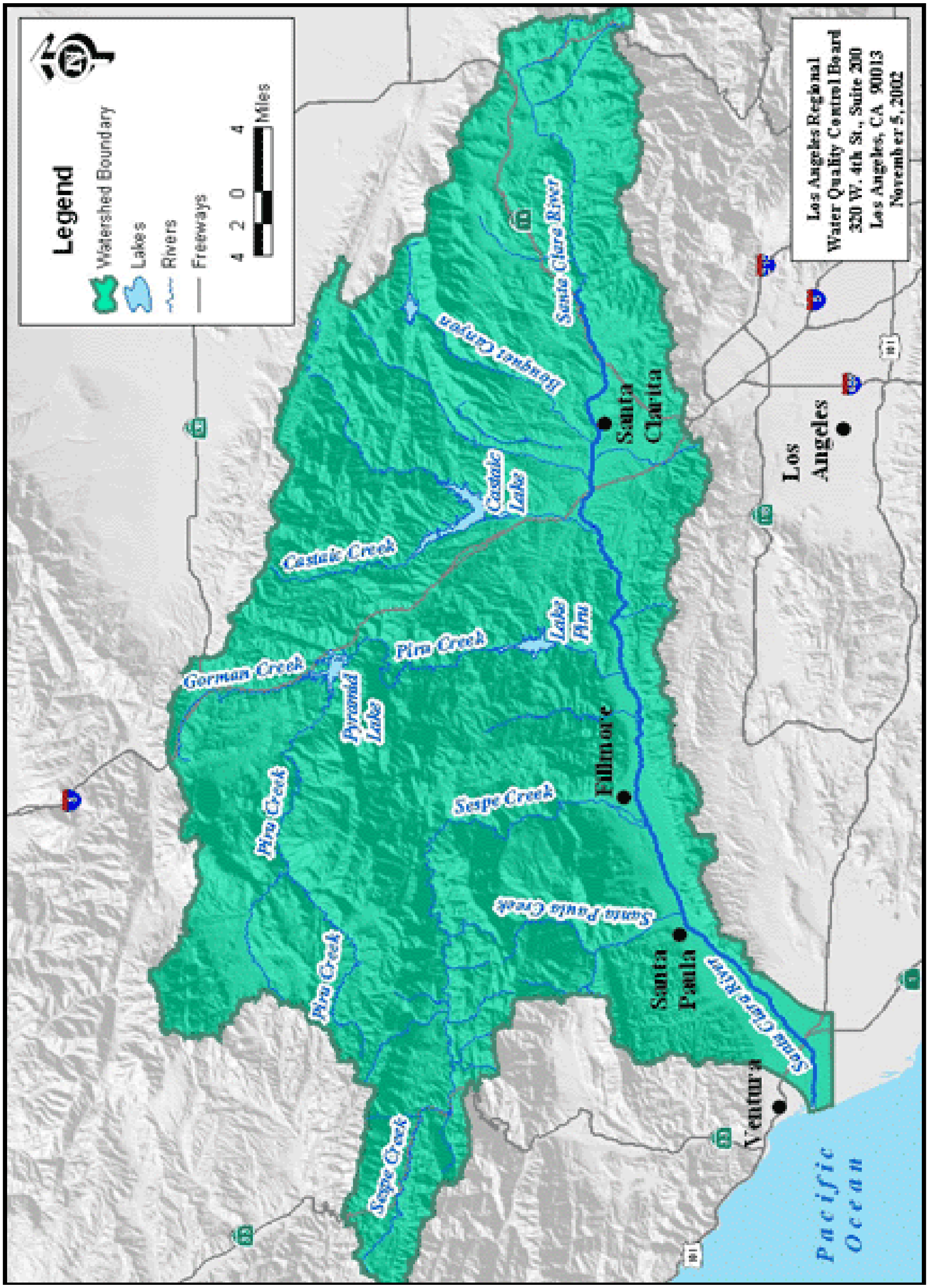


FIGURE 2-3
SANTA CLARA RIVER WATERSHED

The remaining 10 percent of the watershed is largely the relatively flat terrain of the Oxnard Plain, Santa Clarita Valley, Castaic Valley, Santa Clara River Valley, and the floors of the larger canyons, including upper Soledad, lower Sand, Mint, Bouquet, Placerita, San Francisquito, Piru, Santa Paula, and Sespe (WCVC, 2014).

Historic records indicate that the climatic and basin characteristics of the Santa Clara River Watershed generally produce an intermittent flow regime in the mainstem; however, flows can increase rapidly in response to high intensity rainfall with the potential for severe flooding. At certain times of the year, the river may have continuous surface flow to the Pacific Ocean from natural watershed discharge. Controlled releases of water from Lake Piru supplement surface flows in the river reach in Ventura County. Incidental flows are supplied from water reclamation plant discharges and imported water runoff in the middle reach from the Santa Clarita vicinity to the Los Angeles County and Ventura County line. It is important to note that the current and future amounts of effluent discharges from these facilities can fluctuate due to several factors including seasonal variations, changes in treatment requirements, population growth, and effluent reuse. These flows are not considered a component of the natural base flows for the river; however, they do constitute a component of the comprehensive hydrological regime (i.e., surface and recharge waters) (WCVC, 2014).

2.3.2 Local Basin Overview

There are two primary aquifer systems of importance to the City within the Oxnard Forebay Ground Water Basin and the Oxnard Plain Ground Water Basin including the following:

- Upper Aquifer System (UAS) – The UAS consists of the semiperched zone, the Oxnard Aquifer, and the Mugu Aquifer.
- Lower Aquifer System (LAS) – The LAS is comprised of the Hueneme, Fox Canyon, and Grimes Canyon Aquifers.

The Forebay Basin is an important part of the aquifer system, where the aquifers come together and are unconfined (see Figure 2-4). The Forebay Basin is recharged from the Santa Clara River and by river water that is diverted to UWCD's spreading basins. The Forebay Basin is hydraulically connected to the aquifers in the Oxnard Basin. Thus, the primary recharge to the Oxnard Basin is from the underflow from the Forebay Basin (Oxnard, 2016).

Many of the ground water zones of the Oxnard Plain are confined, meaning the ground water aquifers are overlain by one or more clay layers (see Figure 2-4). Above the uppermost layer there is perched water, but this water is of poor quality and is not used as a water supply.

The semiperched zone is the uppermost water-bearing unit in the area (see Figure 2-4). It is composed of fine to medium-grained sand with interbedded silty clay lenses, with an average thickness of about 30 feet with a maximum of 80 feet. Immediately below the semiperched zone and overlying the Oxnard Aquifer is a confining bed, or clay cap, consisting primarily of silty and sandy clays with an average thickness of approximately 35 feet (Oxnard, 1994) and with a maximum thickness of 150 feet (Oxnard, 2012).

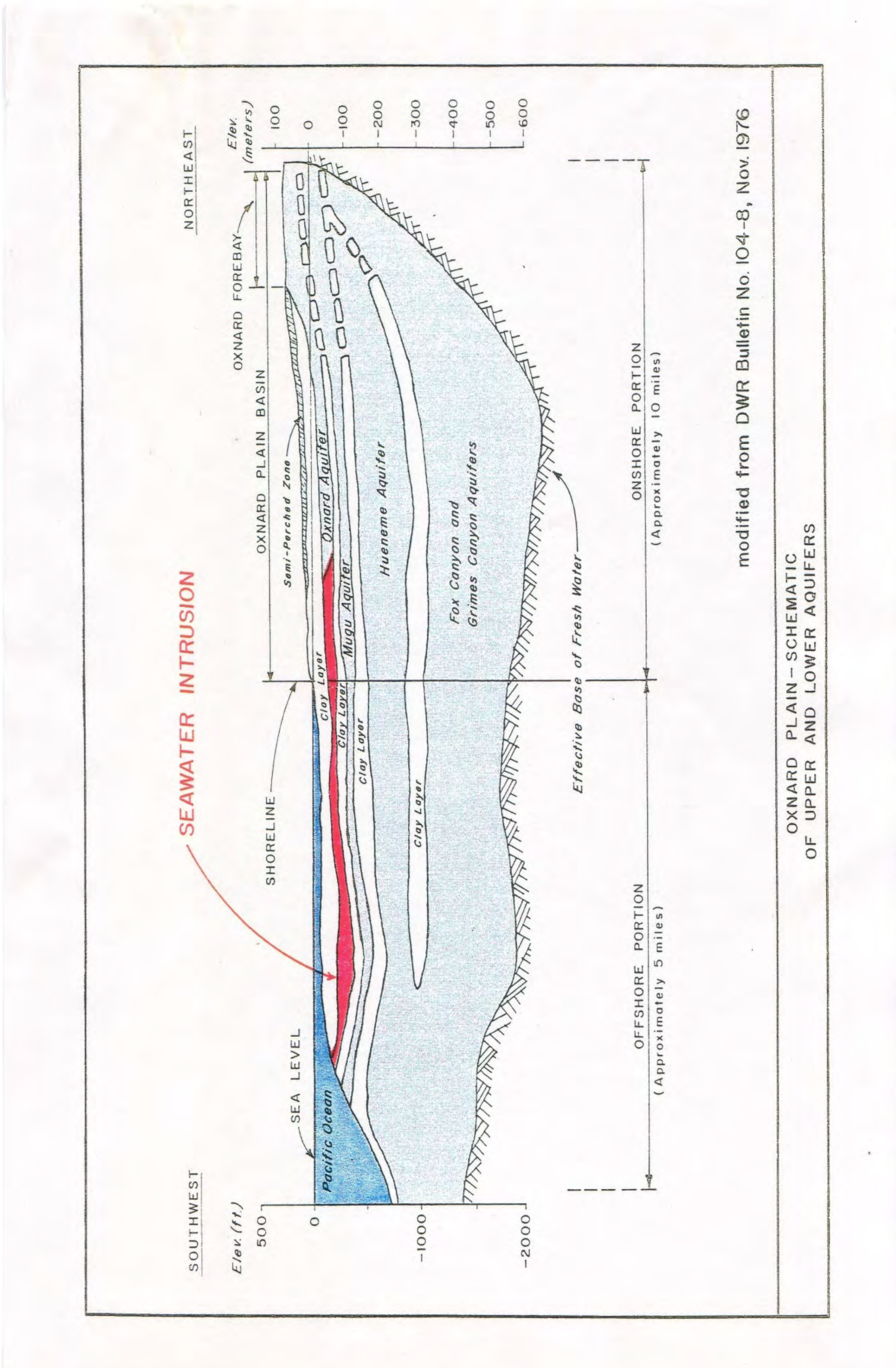


FIGURE 2-4
CROSS-SECTION OF THE OXNARD PLAIN AQUIFERS

The Oxnard Aquifer, one of the most important water sources on the Oxnard Plain, is composed of fine to coarse-grained sand, gravel, and boulder deposits (see Figure 2-4). Within these areas, the aquifer is a single unit of high permeability with no prominent silt or clay lens interruptions and has an average and maximum thickness of approximately 91 and 150 feet, respectively, at an average depth of 100 to 180 feet below grade. Permeability, or the ability to transmit water, of this aquifer ranges from 1,700 to 2,000 gallons per day per square foot (gpd/ft^2). Ground water levels in the Oxnard Aquifer change considerably from year to year depending on Santa Clara River recharge and total pumping quantities (Oxnard, 1994).

Immediately below the Oxnard Aquifer, and separating it from the Mugu Aquifer, is an aquitard composed of silty clay with some interbedded sandy clay lenses (see Figure 2-4). The average thickness of this aquitard is approximately 30 feet, although the maximum thickness has been reported to be 150 feet. The material which forms the Mugu Aquifer is fine to coarse-grained sand and gravel with some interbedded silty clay. The average thickness of the water-bearing zone is approximately 110 feet. Permeability at the Mugu Aquifer ranges between 1,900 and 2,200 gpd/ft^2. In the Forebay area where the Santa Clara River enters the Oxnard Plain near Saticoy and near the Mugu Lagoon, the Mugu Aquifer merges with the Oxnard Aquifer. The Mugu Aquifer is reported to be in hydraulic continuity with the ocean (Oxnard, 1994). Underlying the Mugu Aquifer is an aquitard composed of silty clay that reaches a maximum thickness of 80 feet within the Oxnard Plain. This aquitard is continuous, except in the Forebay area, where the Hueneme Aquifer merges with the other ground waters (Oxnard, 1994).

The Hueneme Aquifer is composed of irregularly interbedded sand, silt and clay, with some gravel, ranging in thickness from 100 feet within the City of Port Hueneme to about 300 feet north of the City of Oxnard (see Figure 2-4). Permeability for this water-bearing zone is estimated to be 400 to 600 gpd/ft^2. This aquifer is reported to be in hydraulic continuity with the ocean. The Hueneme Aquifer is separated from the underlying Fox Canyon aquifer by an aquitard composed of silt and clay and which is absent only where the Fox Canyon Aquifer merges with the Hueneme Aquifer in the northern portion of the Forebay area. The maximum thickness in the basin is approximately 170 feet (Oxnard, 1994).

The Fox Canyon Aquifer is composed of fine to coarse-grained sand with gravel stringers and interbedded silt and clay (see Figure 2-4). With a maximum thickness of approximately 550 feet in the Oxnard Plain, permeability of this water-bearing zone range from 200 to 400 gpd/ft^2. The aquitard that separates the Fox Canyon and the underlying Grimes Canyon Aquifers is composed of silt and clay, and attains a maximum thickness of about 40 feet in the Oxnard Basin.

The Grimes Canyon Aquifer (see Figure 2-4) is composed of fine to coarse-grained materials, with a maximum thickness of more than 1,500 feet and corresponds in area to the Fox Canyon Aquifer (Oxnard, 1994).

The City has wells that take water from both the Upper Aquifer System and the Lower Aquifer System, as further described in Section 2.3.5.

2.3.3 Fox Canyon Groundwater Management Agency

The Fox Canyon Groundwater Management Agency (FCGMA, staffed by County of Ventura employees) was created at the direction of the State Water Resources Control Board to address ongoing overdraft and seawater intrusion into the Oxnard Plain Basin. The purpose of the FCGMA is to manage the region’s ground water supply by protecting the quantity and quality of local ground water resources and by balancing the supply and demand for ground water resources.

The FCGMA was formed in 1982 by Act 2750 passed by the California Legislature. The Agency monitors and controls pumping within the FCGMA boundaries. Preceding this Act was State Assembly Bill No. 2995 (AB 2995) passed by the California Legislature in September 1982. Specifically, the legislation allows the agency to perform the following functions:

"Planning, managing, controlling, preserving and regulating the extraction and use of ground water within the agency (§§ 402, 403). May collect data and carry out investigations (§ 501). May recommend and encourage wastewater reclamation and reuse projects that contribute to good ground water management (§ 503). May control extractions from the Oxnard and Mugu aquifers with the goal of balancing supply and demand within the basin by year 2010 (§ 601); develop ground water management plan for the Grimes Hueneme and Fox Canyon basins and may limit future extractions, considering the effects of seawater intrusion and other factors (§§ 313, 602). If the board determines that ground water management activities are necessary to protect an aquifer, it may require conservation practices, control ground water extractions and extraction facilities, pursue legal actions to prevent unreasonable use and unreasonable methods of use that adversely affect the ground water supply, impose spacing limitations on new extractions, establish operating procedures for extraction facilities including rotation pumping requirements (§ 701). May require registration of extraction facilities and installation of water flow measuring devices (§§ 801, 804). May require reports of annual extractions (§ 810)."

Importantly, the FCGMA may establish uniform ground water extraction charges (§§ 1001, 1003). This is a mechanism intended by the FCGMA to limit the amount of ground water pumping to amounts that meet basin objectives. This authority was granted by Senate Bill 747 (SB 747), approved in June 1991, which amended and added to AB 2995, to allow extraction allocations for each water well.

The FCGMA has jurisdiction over ground water pumping for all of the land which overlies the Fox Canyon Aquifer. This encompasses approximately 185 square miles and includes the Oxnard Forebay and the Oxnard Plain Basins underlying most of the City of Oxnard. While the basins of the FCGMA are not adjudicated basins, the basins are fully managed by FCGMA.

2.3.3.1 FCGMA Programs

In 1985, a plan for management of the LAS and UAS within the FCGMA boundaries was adopted. Major elements of the UAS Plan include the following:

- Ventura County Ordinance No. 3739, which prohibits the construction, repair, or modification of UAS wells in areas where increased extractions would increase the overdraft and the rate of seawater intrusion in the Oxnard Plain.
- Completion of the Seawater Intrusion Abatement Project through improvement of the Vern Freeman Diversion Dam Project and operating the project under criteria developed to ensure proper water allocation.
- Annual monitoring to determine the effectiveness of the Vern Freeman Project.
- Preparation of and updates to a Groundwater Management Plan.

The FCGMA establishes its management policies based on its comprehensive assessment of current and anticipated future ground water conditions, given its assessment of changes in ground water use, planned local and regional water supply projects, and other relevant conditions. The most recent assessment is documented in the FCGMA Groundwater Management Plan (GWMP) adopted in May 2007 (FCGMA, 2007). A copy of the GWMP is provided in Appendix B.

2.3.3.2 FCGMA Ordinances

One of the most significant ordinances by the FCGMA was Ordinance No. 5, adopted in August 1990; its current terms and conditions are contained in Ordinance 8, as amended. This ordinance required reductions in ground water extractions of 25 percent, within the FCGMA boundary, with the objective of reducing extractions to the achieve the Basin "safe yield".

Ordinance No. 5 was periodically updated over the years. Ordinance 8, as amended, provides for baseline allocations, historical allocations, and a schedule of historical pumping allocation reductions. The baseline pumping allocations of one acre-foot (AF) per acre are credited to the pumper for lands not irrigated during 1985 to 1989 base period. Historical extractions were established during the 5-year period from 1985 to 1989. A series of five reductions of 5 percent each (25 percent total) to baseline pumping allocations were implemented over the period 1990 to 2010. Ordinance No. 7, adopted in June 1991, which later was amended into Ordinance No. 5.1 (and later contained in Ordinance 8, as amended), was established to prevent the waste of water by agricultural users. This Ordinance requires an agricultural water well operator to be 80 percent efficient when considering ETo and crop factors when an operator lacks enough historical allocation for the current crop being grown to avoid penalties.

Ordinance No. 8 was adopted in 2002 and includes a conglomeration of all prior ordinances into an “Ordinance Code”. The main purpose of combining the ordinances together in an “Ordinance Code” was to reduce confusion, eliminate redundant text, and to shorten the laws into a more manageable format. Ordinance No. 8.9 (adopted December 2018) is the most recent revision to Ordinance No. 8.

Emergency Ordinance E, adopted April 2014, requires additional pumping restrictions of 20 percent within the FCGMA boundary. These reductions include an additional 10 percent on July 1, 2014, additional 5 percent on January 1, 2015, and additional 5 percent on July 1, 2015. In addition, Emergency Ordinance E states the following, "…conservation credits shall not be obtained and may not be used to avoid paying surcharges for extractions while this emergency ordinance is in effect”. Emergency Ordinance E may impact the City's ground water allocations, allocation transfers, extraction of local ground water, and management of ground water conservation credits.

2.3.3.3 Credits and Transfers

Historically, unused ground water allocations (or conservation credits) could be accumulated and used in future years without monetary penalty. Ground water pumpers, including the City, could also accrue ground water storage credits by recharging the aquifers with foreign water (including but not limited to recycled water and imported water). These ground water storage credits could also be used in the future, with FCGMA advance approval, without incurring the FCGMA penalty. In addition, adjustments and transfers of ground water extraction allocations are allowed under Ordinance 8, as amended. As noted above, Emergency Ordinance E includes the provision that conservation credits shall not be obtained and may not be used to avoid paying surcharges for extractions while Emergency Ordinance E is in effect. It is understood that Emergency Ordinance E did not impact FCGMA adjustments and transfers of ground water extraction allocations (FCGMA, 2018).

When irrigated agricultural land within the FCGMA jurisdiction changes to municipal and industrial (M&I) use, the ground water extraction allocation may be transferred to the M&I water supply provider. The amount of allocation available for transfer from agricultural land is based on the amount of extraction allocation for a given base period (2005-2014). For purposes of preparing this WSA, it is understood that the FCGMA ground water allocation transfer rate for agriculture to M&I projects is anticipated to be 1.0 AFY transferred per 1.0 AFY of irrigation extraction (FCGMA, 2019). The Project Proponents (with the coordination from and approval by the City) will be required to obtain FCGMA approval for the ground water allocation transfer to the City (FCGMA, 2018).

2.3.4 City Ground Water Production

The City serves a diverse customer base including a population of nearly 200,000 and over 41,500 accounts. The City’s current service area includes nearly 27 square miles (see Figure 2-1). The City currently has six active wells located at the Water Campus and four additional wells located at Blending Station No. 3. As indicated in Section 2.3, local ground water is generally extracted from the aquifers of the Oxnard Plain Ground Water Basin.

After the City pumps the ground water, the water is mixed (blended) with imported water or desalted water at the City's blending stations. Ground water pumping capacity is a function of aquifer condition as well as the condition of the well, pumping equipment, and ground water levels.

Table 2-1 summarizes the City's ground water production for 2011-2015. Average production for 2011-2015 is 7,283 AFY. The City's ground water production in 2015 is 7,110 AFY. City ground water pumped includes brine from the City's Desalter facility (Oxnard, 2016).

TABLE 2-1
CITY GROUND WATER PRODUCTION FOR 2011-2015

	2011 (AF)	2012 (AF)	2013 (AF)	2014 (AF)	2015 (AF)
City Ground Water (a)	**10,731**	**5,174**	**5,748**	**7,650**	**7,110**

Notes:
All values rounded in AFY.
(a) Source: Oxnard, 2016.

Table 2-2 indicates that the City ground water production, purchases of ground water from UWCD, and purchases of imported surface water from CMWD provided 25,066 AFY in 2015. Table 2-2 also indicates that City ground water production provided 7,110 AFY in 2015 (28 percent of the City's water supply).

TABLE 2-2
CITY WATER PRODUCTION AND PURCHASES FOR 2015

Year	City Ground Water Production (AF)	City Ground Water Purchased from UWCD (AF)	City Surface Water Purchased from CMWD (AF)	Total (AF)
2015 (a)	**7,110**	**7,344**	**10,612**	**25,066**
Percentage	**28**	**29**	**42**	**100**

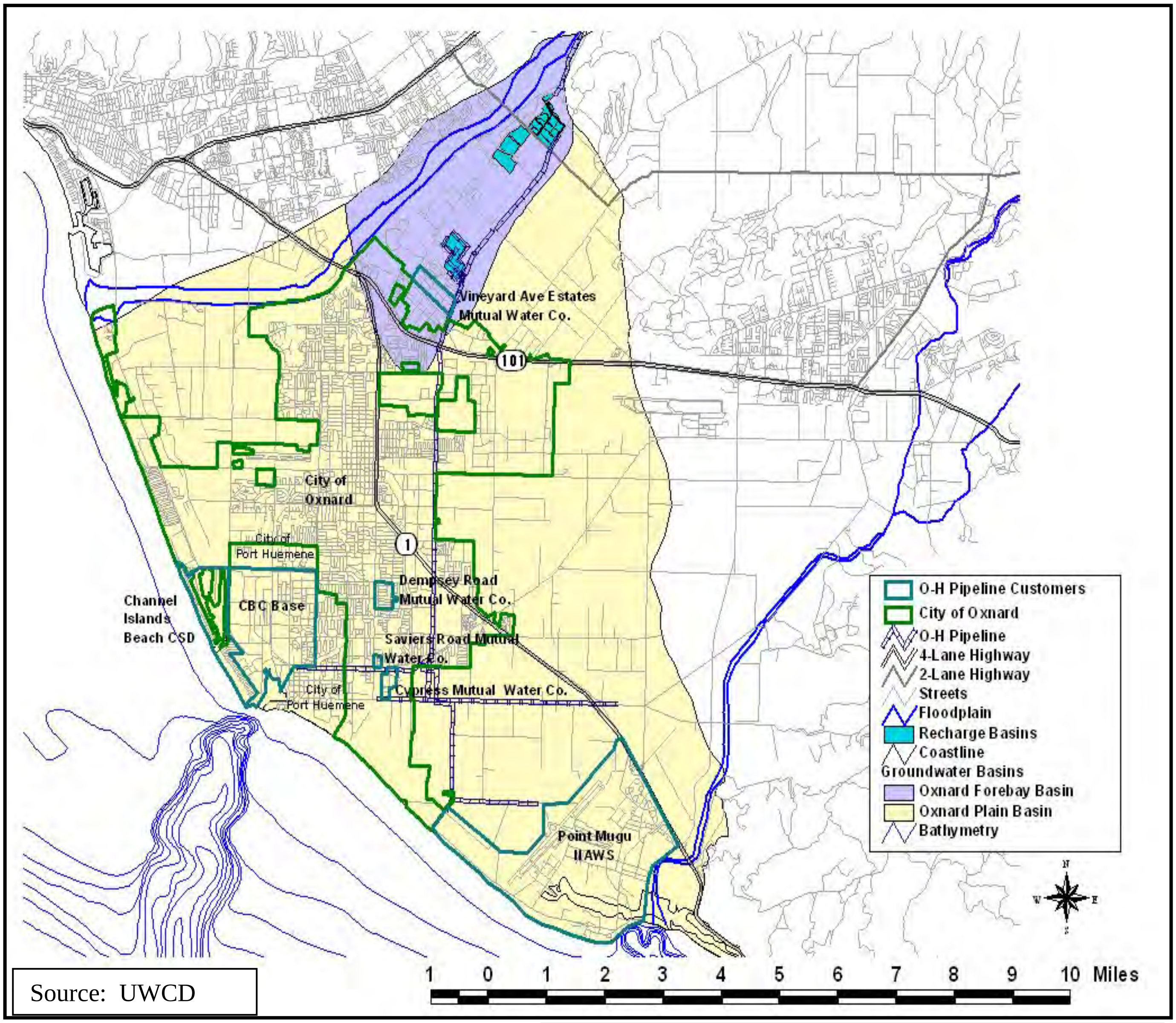
Notes:
All values rounded in AFY.
(a) Source: Oxnard, 2016.

2.3.5 Purchase of Ground Water From United Water Conservation District

United Water Conservation District is a public agency that manages ground water and delivers water to cities and agriculture within an area of approximately 330 square miles within Ventura County. Among United's urban water customers are the cities of Oxnard, Port Hueneme, and the United States Naval Base Ventura County. The District got its name in 1954 when farmers and cities "united" to develop local water supplies. Figure 2-5 provides an overview of the District's facilities in the Oxnard Area.

The original founding organization for United Water was named the "Santa Clara River Protective Association". It was formed in 1925 to protect the runoff of the Santa Clara River from being appropriated and exported outside the watershed. One reason local farmers formed the Association was to prevent the Los Angeles Department of Water and Power from exporting local water to Los Angeles. The District began a systematic program of ground water recharge in 1928, primarily by constructing spreading grounds along the Santa Clara River in Piru, Santa Paula, and Saticoy.

In the early 1900s, ground water was so plentiful in the Oxnard Plain that some water wells flowed freely under artesian pressure. Seeping ground water caused the ocean to be fresh near the coast, and ships refilled their water stores while anchored offshore. But by the early 1950s, over-pumping had caused seawater to intrude into about 20 square miles of the aquifer near the coast, causing some wells to become unusable. In 1954, cities and farmers "united" to solve these problems and subsequently formed United Water Conservation District to recharge underground aquifers and to supply water to cities and farms.



Source: UWCD

FIGURE 2-5
UWCD FACILITIES IN THE OXNARD AREA

Many of the District's facilities were built in the 1950s, including the Santa Felicia Dam (Lake Piru), new spreading grounds at Saticoy and El Rio, the Oxnard-Hueneme Pipeline System (O-H System), and the Pleasant Valley Pipeline (an irrigation water system to replace canals on the Oxnard Plain). Since then, other facilities have been built as needed to manage local water, including the Pumping Trough Pipeline (serving agriculture on the Oxnard Plain), the improved Freeman Diversion Dam on the Santa Clara River, and the O-H system improvements in 1998. Since it was formed in 1954, United has equally served both cities and farms within its service area.

UWCD diverts Santa Clara River water at the Vern Freeman Diversion Dam southeast of Saticoy and delivers a portion of the water to the Saticoy and El Rio Spreading Grounds and to agricultural users on the Oxnard Plain. Water percolated in these spreading basins recharges the Forebay Basin and the Oxnard Plain Basin. Eleven UWCD wells are then used to extract the water and deliver it to the O-H users. Of the eleven wells, three extract water from the LAS, and the remaining eight extract water from the UAS. The El Rio wellfield has sufficient active pumping capacity to supply the peak O-H pipeline capacity of 53.0 cfs. Water extracted by these wells is delivered to the El Rio Pumping Station, disinfected, and pumped through the O-H Pipeline to each of the O-H customers. UWCD built the O-H system in 1954 to move municipal ground water extraction away from coastal areas subject to seawater intrusion. The O-H System consists of 12 miles of transmission pipeline.

Table 2-2 indicates that UWCD provided the City with 7,344 AF of ground water in 2015 or 29 percent of the City's water supply (Oxnard, 2016). This arrangement has been in place since 1954 and formalized in the 1996 Water Supply Agreement for Delivery of Water through the Oxnard-Hueneme Pipeline. UWCD holds a pumping sub-allocation for all users of the O-H Pipeline, which includes the City, PHWA, and a number of small mutual water companies.

2.4 Purchase of Imported Surface Water

To provide for long-range improvement of its water quality, the City annexed to Calleguas Municipal Water District (CMWD) in February 1961. CMWD is a member agency of (Metropolitan Water District of Southern California (MWDSC). MWDSC is the State Water Contractor from which CMWD purchases SWP supplies.

2.4.1 State Water Project

Oxnard receives imported surface water from the State Water Project (SWP) via CMWD. The SWP is the largest state-built, multi-purpose water project in the country. It was authorized by the California State Legislature in 1959, with the construction of most initial facilities completed by 1973. The SWP is owned by the State of California and operated by the DWR. The primary purpose of the SWP is to deliver water to 29 urban and agricultural water suppliers in Northern California, San Francisco Bay Area, San Joaquin Valley, Central Coast, and Southern California, including 20 million urban users and 750,000 acres of farmland. Of the contracted water supply, approximately 70 percent goes to urban users and 30 percent goes to agricultural users.

SWP facilities originate in northern California at Lake Oroville on the Feather River (see Figure 2-6). Storage released from Lake Oroville flows into the Feather River, goes downstream to its confluence with the Sacramento River, and then travels into the Sacramento-San Joaquin River Delta (Delta). Water is pumped from the Delta region to contractors in areas north and south of the San Francisco Bay and south of the Delta. SWP deliveries consist solely of untreated water. The SWP system currently consists of 700 miles of canals and pipelines (500 miles to Oxnard), 33 storage facilities totaling 5.8 million acre-feet (MAF) of storage, 5 hydro-electric power plants, 4 pumping-generating plants, and 20 pumping plants. Figure 2-6 illustrates the location of major SWP facilities.

While some SWP supplies are pumped from the northern Delta into the North Bay Aqueduct, the clear majority of SWP supplies are pumped from the southern Delta into the 444-mile-long California Aqueduct.

The California Aqueduct conveys water along the west side of the San Joaquin Valley to Edmonston Pumping Plant, where water is pumped over the Tehachapi Mountains and the aqueduct then divides into the East and West Branches. In addition to delivering water to its contractors, the SWP is operated to improve water quality in the Bay-Delta region, control flood waters, provide recreation, power generation, and environmental enhancement.

Source: CA DWR.

FIGURE 2-6
STATE WATER PROJECT FACILITIES

2.4.2 SWP Reliability

The amount of SWP water delivered to MWDSC and other State Water Contractors in a given year depends on a number of factors, including the demand for the supply, amount of rainfall, snowpack, runoff, water in storage, pumping capacity from the Delta, and legal/regulatory constraints on SWP operation. Water delivery reliability depends on three general factors: the availability of water, the ability to convey water to the desired point of delivery, and the magnitude of demand for the water. Urban SWP contractors' requests for SWP water, which were low in the early years of the SWP, have been steadily increasing over time. Regulatory constraints have changed over time, becoming more restrictive.

"Water delivery reliability" is defined as the annual amount of water that can be expected to be delivered with a certain frequency. SWP delivery reliability is calculated using computer simulations based on nearly 100 years of historical data. Contractors' requests for their water entitlements cannot always be met. In some years there are shortages and in other years surpluses.

Recent DWR reports have recognized continuing challenges to the ability of the SWP to deliver full contractual allocations of SWP water. Factors that affect the ability to estimate existing and future SWP water delivery reliability include the following:

- water availability at the source
- water rights with priority over the SWP
- climate change
- regulatory restrictions on SWP exports
- ongoing environmental and policy planning efforts
- San Joaquin River/Sacramento River Delta levee failure.

2.4.3 Metropolitan Water District

Metropolitan Water District of Southern California (MWD) was organized in 1928 by a vote of the electorates of 13 Southern California cities. The first function of Metropolitan was building the Colorado River Aqueduct (CRA) to convey water from the Colorado River. Deliveries through the aqueduct to member agencies began in 1941 and supplemented the local water supplies of the Southern California member cities. In 1960, to meet growing water demands in its service area, Metropolitan contracted for additional water supplies from the State Water Project via the California Aqueduct, which is owned and operated by DWR. SWP deliveries began in 1972. Metropolitan currently receives imported water from both of the following sources: (1) Colorado River water via the CRA, and (2) the SWP via the California Aqueduct (MWD, 2016).

Metropolitan's service area covers the Southern California coastal plain. It extends about 200 miles along the Pacific Ocean from the city of Oxnard on the north to the international boundary with Mexico on the south, and it reaches as far as 70 miles inland from the coast. The total area served is approximately 5,200 square miles, and it includes portions of Los Angeles, Orange, Riverside, San Bernardino, San Diego, and Ventura counties. Although only 14 percent of the land area of the six Southern California counties is within Metropolitan's service area, nearly 85 percent of the population (18.7 million people) within those counties reside within Metropolitan's boundaries (MWD, 2016).

The Colorado River was Metropolitan's original source of water after Metropolitan's establishment in 1928. Metropolitan has a legal entitlement to receive water from the Colorado River under a permanent service contract with the Secretary of the Interior. The CRA, which has a capacity of 1.2 MAF a year, is owned and operated by Metropolitan. It transports water from Lake Havasu, at the border of the state of California and Arizona, approximately 242 miles to its terminus at Lake Mathews in Riverside County (MWD, 2016).

Metropolitan imports water from the SWP, owned by the state of California and operated by the DWR. This project transports Feather River water stored in and released from Oroville Dam and conveyed through the Bay-Delta, as well as unregulated flows diverted directly from the Bay-Delta south via the California

Aqueduct to four delivery points near the northern and eastern boundaries of Metropolitan's service area. In 1960, Metropolitan signed a contract with DWR for SWP water supplies. Metropolitan is one of 29 agencies that have long-term contracts for water service from DWR and is the largest agency in terms of the number of people it serves. In 1960 MWD agreed to purchase up to 1.9 million AFY from the SWP. However, MWD only receives approximately 1.3 million AFY during an average year and 0.5 million AFY in a single dry water-year due to climatic, operational, and regulatory restrictions (MWD, 2016).

2.4.4 Calleguas Municipal Water District

CMWD is an enterprise special district that was formed by the voters of southern Ventura County in 1953 for the purpose of providing a safe, reliable water supply. In 1960, CMWD became a member agency of MWD, which provides wholesale water from the Colorado River via the Colorado Aqueduct and from northern California via the State Water Project (SWP). CMWD distributes high quality drinking water on a wholesale basis to 19 local purveyors, who in turn deliver water to area residents, businesses, and agricultural customers. See Figure 2-7 for the CMWD service area. Approximately 630,000 people within Ventura County, including Oxnard, receive all or a portion of their municipal water from CMWD.

The SWP water purchased by CMWD is filtered and disinfected at MWDSC's Joseph Jensen Filtration Facility in Granada Hills. CMWD receives the treated water from MWDSC via the West Valley Feeder and either stores the treated water in Lake Bard (see Figure 2-8) to be re-treated at the Lake Bard Water Filtration plant before distribution or feeds the water directly to the Springville Reservoir near Camarillo.

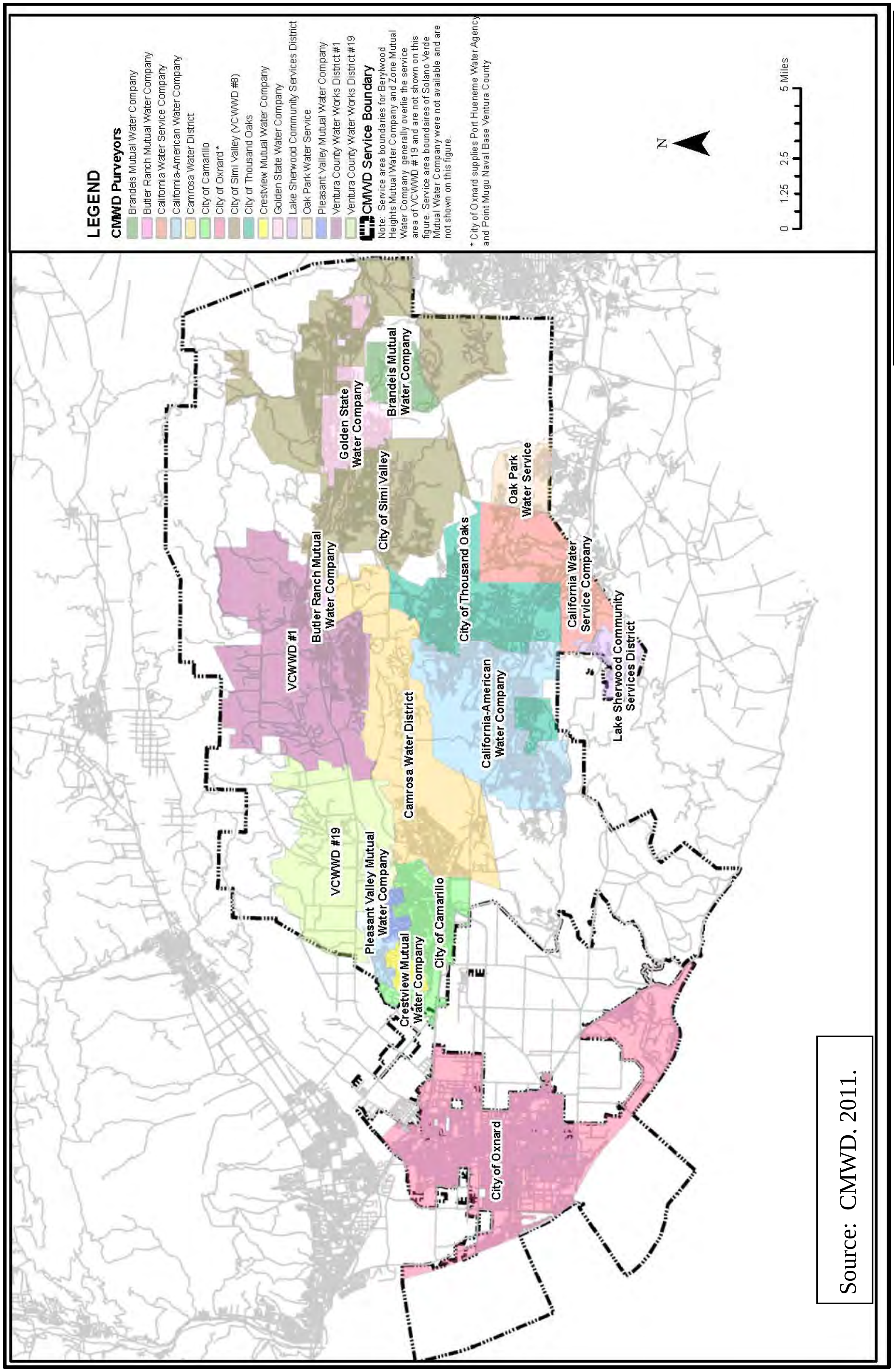
2.4.5 City Imported Surface Water Supply

The City receives imported surface water from CMWD's Springville Reservoir (see Figure 2-8) through the City's Oxnard and Del Norte Conduits that feed five of the City's six water blending stations. Table 2-2 indicates that in 2015 the City purchased approximately 10,612 AF of water from CMWD (Oxnard, 2016). The City is part of the Three-Party Agreement with the Port Hueneme Water Agency (PHWA) and CMWD to transfer approximately 700 AFY of SWP in exchange for an equal amount of PHWA local ground water allocations.

2.5 Oxnard Water Quality

The City is committed to providing its customers with high quality water that meets all national (US Environmental Protection Agency, USEPA) and State (California SWRCB, Division of Drinking Water, CDDW) primary drinking water standards. As noted earlier in this Section, the City is fortunate to have multiple sources of water supplies. The City distributes a blend of treated UWCD ground water, treated City ground water, and treated CMWD surface water. If necessary, the City can temporarily shift production or purchases between water sources while resolving a water quality issue with a specific source.

Each of the City's water resources includes one or more water quality issues. This includes SWP water (total dissolved solids, TDS, and organics), UWCD water (TDS and nitrates), and City ground water (TDS, nitrates, and radionuclides). A copy of the City's 2019 Consumer Confidence Report (Oxnard, 2019), which summarizes the City's water quality for the year 2018, is provided in Appendix C. However, the City does not anticipate the loss of any of its current or planned supplies or change in reliability due to water quality impacts.



Source: CMWD. 2011.

FIGURE 2-7
CMWD SERVICE AREA

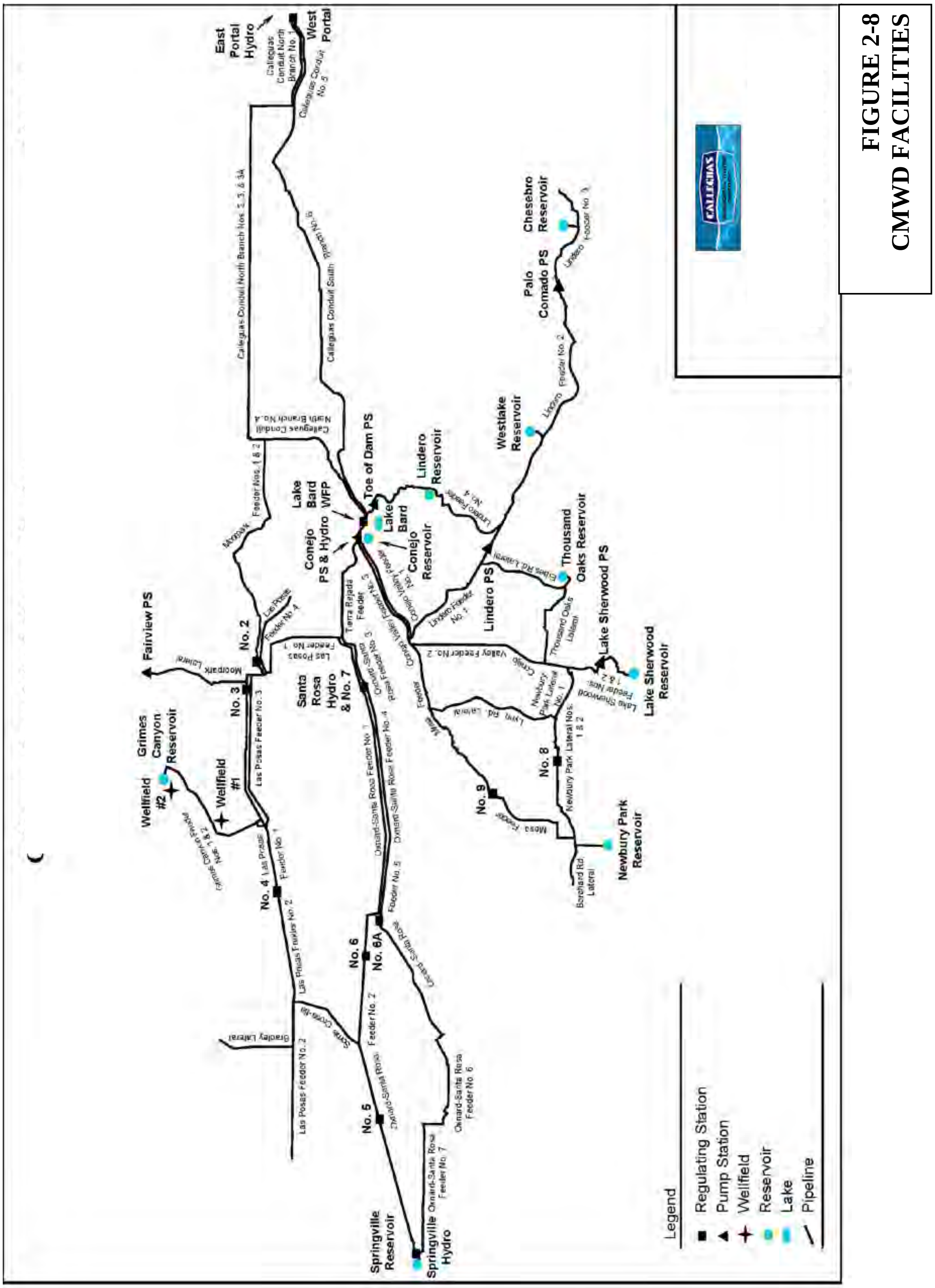


FIGURE 2-8
CMWD FACILITIES
East Portal Hydro
West Portal
Fairview PS
Grimes Canyon Reservoir
Wellfield #2
Wellfield #1
No. 2
No. 3
No. 4
No. 5
No. 6
No. 6A
No. 8
No. 9
Santa Rosa Hydro & No. 7
Conejo PS & Hydro
Lake Bard WFP
Toe of Dam PS
Lake Bard
Conejo Reservoir
Lindero Reservoir
Westlake Reservoir
Palo Comado PS
Chesebro Reservoir
Lindero PS
Thousand Oaks Reservoir
Lake Sherwood PS
Lake Sherwood Reservoir
Newbury Park Reservoir
Springville Reservoir
Springville Hydro
Legend
Regulating Station
Pump Station
Wellfield
Reservoir
Lake
Pipeline

2.6 Recycled Water

The City's recycled water system obtains source water from the City's Oxnard Wastewater Treatment Plant (OWWTP). The OWWTP is a secondary treatment plant located at 6001 S. Perkins Road in the City of Oxnard. All the treated effluent is currently discharged to the Pacific Ocean (Oxnard, 2012). The OWWTP has an average dry weather flow (ADWF) design capacity of 31.7 MGD (35,500 AFY) with provision for an ultimate ADWF design capacity of 39.7 MGD (44,500 AFY). The 2012 flow to the OWWTP was 23 MGD (25,800 AFY).

One key component of the GREAT Program is the development of the Advanced Water Purification Facility (AWPF) and the Recycled Water System (Oxnard, 2002; Oxnard 2005). The AWPF is a highly innovative wastewater purification plant designed to deliver recycled water that is safe, clean, and clear to meet any future needs (Oxnard, 2012). Water produced from the City's AWPF will undergo one of the world's most highly developed purification processes, one that is successfully used in several locations. Treated wastewater from the Oxnard Wastewater Treatment Plant that is usually sent to the ocean will instead be further purified using three steps: microfiltration, reverse osmosis, and advanced oxidation with ultraviolet light and hydrogen peroxide.

The resulting high-quality recycled water will be distributed through the City's recycled water pipeline system. Initial uses of recycled water may include: irrigation of parks, medians, golf courses and athletic fields; watering of agricultural crops; and process water for local industries (Oxnard, 2012). In addition, the recycled water can be injected into the ground water to create a seawater intrusion barrier to help ensure that salt water from the ocean does not intrude into the City's local ground water sources. This water is so pure it can be used to meet any water supply needs in the future, including replenishing Oxnard's ground water supply.

The first phase of the AWPF and the Recycled Water Backbone System (RWBS) have been completed. In 2015, the City sold approximately 605 AFY of recycled water for golf course irrigation. Future expansions of the AWPF and the Recycled Water System will be developed when funding becomes available (Oxnard, 2012). Recycled water will be a key component of the City's future water supply strategy as noted in Section 3 and Section 4.

All the above uses are identified within the FCGMA 2007 Ground water Management Plan as key strategies to alleviate over-pumping within the Oxnard Plain and Pleasant Valley areas of western Ventura County (Oxnard, 2012). Use of high quality recycled water within the region will have a direct benefit of introducing a new, additional water supply source to the region. The high quality water (low salt content) also has the supplemental benefit of reducing the salt content of water used within the region. To the extent this high-quality water is used within the City to offset current potable demand, it will also have the direct benefit of offsetting or reducing use of local ground water and imported water. Direct agricultural use of recycled water will provide tandem benefits of reducing reliance on local ground water and reducing salt loading in comparison to the lower quality ground water and surface water currently used for applied irrigation. FCGMA policies will allow the City the right to pump ground water (via recycled water pumping allocations) in an amount equivalent to the recycled water used (to replace potable water use and or ground water pumping) within the region.

2.7 Future Water Supplies

Table 2-3 indicates that the City estimates approximately 40,341 AFY of available supplies in 2020, with supplies increasing to approximately 54,341 AFY in 2040. The City anticipates 21,186 AFY of ground water via City wells for the period 2025-2040, including desalted water and water from the aquifer storage and recovery (ASR) program wells. Estimated ground water purchases from UWCD will be 7,329 AFY through 2040. The City estimates purchases of imported surface water from CMWD at 11,826 AFY through 2040. Estimated available recycled water supplies include 14,000 AFY through 2040 (Oxnard, 2016).

TABLE 2-3
SUMMARY OF PROJECTED WATER SUPPLIES 2020-2040

Projected Water Supplies (AFY) (a)	**2020**	**2025**	**2030**	**2035**	**2040**
Ground Water - City-Produced	14,186	21,186	21,186	21,186	21,186
Ground Water – Purchase from UWCD	7,329	7,329	7,329	7,329	7,329
Imported Surface Water – Purchase from CMWD	11,826	11,826	11,826	11,826	11,826
Recycled Water – City Produced	7,000	14,000	14,000	14,000	14,000
Total Estimated Water Supplies	**40,341**	**54,341**	**54,341**	**54,341**	**54,341**

Notes:
All values rounded in AFY.
(a) Source: Oxnard, 2016.

The City plans to implement an aquifer storage and recovery (ASR) program. This proposed program will include construction of new wells to inject up to 6,000 AFY of high-quality recycled water into local aquifers (also known as indirect potable reuse, or IPR). The City will then extract and treat the water at existing City facilities in times of high potable water demand. The injected recycled water and subsequent treatment will meet all requirements of the new California IPR regulations. In addition, the City plans to implement a direct potable reuse (DPR) program starting in 2025, whereby up to 5,000 AFY (by 2040) of high-quality recycled water is mixed with potable water within the distribution system (Oxnard, 2016).

SECTION 3: WATER DEMAND

3.1 WSA Requirements

The WSA must comply with the following California Water Code requirements:

> (c) (1) The city or county, at the time it makes the determination required under Section 21080.1 of the Public Resources Code, shall request each public water system identified pursuant to subdivision (b) to determine whether the projected water demand associated with a proposed project was included as part of the most recently adopted urban water management plan adopted pursuant to Part 2.6 (commencing with Section 10610).
>
> (2) If the projected water demand associated with the proposed project was accounted for in the most recently adopted urban water management plan, the public water system may incorporate the requested information from the urban water management plan in preparing the elements of the assessment required to comply with subdivisions (d), (e), (f), and (g).

3.2 Current Site Water Demand

The Project site is currently in active agriculture use with row crops. Active wells on the Project site are summarized in Table 3-1. Ground water extraction data were obtained for several wells including Well No. 02N22W33N05 (data available for 1984 to 2017) and Well No. 01N22W05B01 (data available for 1985 to 2017) (FCGMA, 2018). Total extractions for these two wells, with both wells pumping for 32 years, included an average of 475 AFY and same-year maximum of 744 AFY (1990). During the FCGMA base period, currently 2005 - 2014, these two wells produced an average of 509 AFY. Additional active wells located on the Project site include 01N22W04D01A (data available for 1985-2018), 01N22W04D01B (data available for 1985-2014), and 01N22W04D02 (data available for 2014-2018) (FCGMA, 2018).

TABLE 3-1
WELLS KNOWN TO OPERATE ON PROJECT SITE

Well Number (a)	**Annual Average (AFY)**	**Annual Maximum (AFY)**
01N22W04D01A	**2**	**5**
01N22W04D01B	**7**	**21**
01N22W04D02	**3**	**3**
01N22W05B01	**300**	**488**
02N22W33N05	**175**	**337**

Notes:
All values rounded in AFY.
(a) Source: FCGMA, 2018.

3.3 Current City Water Demand

Table 3-2 indicates that the 2015 City water demand is 26,028 AFY (Oxnard, 2016; Table 4-3). These demands include potable water, raw water, and recycled water. Demands include residential, commercial, industrial, institutional, governmental, landscape, agricultural, other, and infrastructure losses. The City also provided 558 AF of imported surface water to PHWA in 2015 as part of the Three-Party Water Supply Agreement with CMWD.

Water demands for the existing Project site are not included in the City's current demand estimate since the City does not currently supply water to the site.

TABLE 3-2
CURRENT AND PROJECTED CITY WATER DEMAND

	2015	2020	2025	2030	2035	2040
Total Estimated Demand (a)	**26,028**	**39,664**	**48,054**	**49,445**	**50,835**	**52,225**

Notes:
All values rounded in AFY.
(a) Source: Oxnard, 2016.

3.4 Future Project Water Demand

The Project will utilize water primarily for the following:

- Up to 990 residential units in a variety of densities and product types on approximately 73 acres
- Up to 132,000 square feet of light industrial development on approximately 9 acres
- Up to 60,000 square feet of retail commercial uses on approximately 9 acres
- Approximately 18 acres of community park space, pocket parks, and greenbelts.

Project Proponents have a primary goal for this Project to be water neutral. To achieve neutrality, the Project needs to contribute water rights, water supplies, or financial or physical offsets to the City that ensure sufficient supply to address Project water demands. Options available may include transfers of FCGMA ground water extraction allocations to the City through agricultural conversion to municipal uses, participation in expansions of the City's recycled water system through physical or financial contributions, and or participation in water conservation projects that produce measurable and sustainable water savings. Non-potable water demands, to be met with City recycled water, will be metered separately. Another Project goal is that water supplies will consist of 100 percent local and sustainable sources including local ground water and recycled water.

Single-family residential customers in the coastal Ventura County areas use an average of approximately 50 to 60 percent of daily water demands for indoor uses, while multiple-family residential customers likely use 70 to 80 percent of water demand for indoor uses. City staff approved of the conservative value of 50 percent of annual water demand used for indoor purposes (potable water) for low-density residential customers within the Project, and 70 percent of water demand used for indoor purposes for medium-density and high-density residential customers within the Project. However, the City does not currently approve of recycled water to be piped to single-family and multiple-family residential parcels for indoor nor outdoor uses. Therefore, landscaped areas for single-family residential and multiple-family residential will be irrigated with potable water. City staff also approved of commercial, mixed use, and light industrial customers likely use of an average of 80 percent indoors (potable water) and 20 percent outdoors (recycled water). Once again, these values are conservative for coastal Ventura County. Landscaped areas for commercial and industrial areas within the Project will be irrigated with recycled water. Also, City staff approved of the water demand rates listed in the Teal Club Development Infrastructure Review (TCDIR; Oxnard, 2007) to be reduced by an additional 10 percent to account for current water efficient indoor fixtures and efficient outdoor irrigation equipment.

This Project will also incorporate extensive water conservation measures to be water neutral. The Project water demand estimate includes significant reductions due to anticipated use of highly water efficient fixtures and appliances by the proposed residential, commercial, and light industrial elements. These water efficient fixtures and appliances are anticipated to be used throughout the bathrooms, kitchens, and laundry facilities within the development.

The Project will include extensive use of City of Oxnard recycled water for landscape irrigation water demands. Recycled water is anticipated to be used for nearly 100 percent of the anticipated landscape irrigation water demands for the proposed commercial and light industrial elements reducing use of potable water. In addition, the Project will include anticipated use of highly water efficient landscape equipment. It is anticipated that this Project will include separate landscape water meters for all properties.

Availability of potable water is the critical water-related criteria for this Water Supply Assessment. This Water Supply Assessment will provide a water demand estimate by the Project Proponents and an estimate by City staff. Water demand estimates are only provided for the "Project" alternative since this alternative will have the highest potable water demands of the three alternatives proposed.

3.4.1 Project Water Demand Estimated by Project Proponents

To estimate annual water demands, the Project Proponents utilized the rates in the City's TCDIR. The TCDIR includes estimated water demands on a gallons per acre per day (gpad) basis which is a valid but basic tool to estimate water demands. Table 3-1 in the TCDIR lists single-family residential estimated water demand as 2,100 gpad, multiple-family residential as 2,800 gpad, and commercial uses (including industrial) as 1,500 gpad. Table 3-2 in the TCDIR indicates that estimated water demand for landscaped areas as 2.5 AFY/acre (2,232 gpad).

Daily potable water demand for the low-density residential areas is estimated to be 2,100 gpad (Oxnard, 2007) minus 10% (demand reduction for current efficiency) equals 1,890 gpad. Table 3-3, provided on the following page, summarizes the estimated water demands for the Project. Potable water demand for the medium-density and high-density residential elements is anticipated to 2,800 gpad (Oxnard, 2007) minus 10% equals 2,520 gpad. Potable water demand for the commercial, mixed use commercial, and light industrial is estimated to be 1,500 gpad (Oxnard, 2007) x 80% (indoors) minus 10% = 1,080 gpad.

Table 3-3 indicates an estimated Project total water demand of 255 AFY, including 210 AFY of potable water and 45 AFY of recycled water for landscape irrigation. Project total water demand at full build-out represents approximately 1.0 percent of the City's 2015 total demand (based on 26,028 AFY; Oxnard, 2016) and approximately 0.5 percent of the City's estimated 2040 total water demand (based on 52,225 AFY; Oxnard, 2016). Estimated total water demand for the Project at full build-out represents approximately 1.0 percent of the estimated increase in City water demand over the next 20 years (difference is 26,197 AFY; 2015 total demand compared to 2040 projected total demand; Oxnard, 2016).

The proposed Project will utilize a total of approximately 255 AFY of water resources, including 210 AFY of City potable water and 45 AFY of City recycled water. The proposed Project is anticipated to transfer to the City approximately 500 AFY of ground water extraction allocations via agriculture land converted to urban uses. This transfer will result in a net increase of approximately 245 AFY to the City which may generate additional revenue for the City. However, the FCGMA may require adjustments to the final amount of extraction allocations transferred to the City. The proposed Project will not require additional ground water or surface water purchases from local or imported sources. The proposed Project will not require or result in the construction of significant additional City water facilities or expansion of existing facilities. Thus, the proposed Project will be water neutral with respect to potable water and recycled water.

TABLE 3-3
PROJECT WATER DEMAND ESTIMATED BY PROJECT PROPONENTS

Sector	**Acres** (a)	**Daily Demand Factor (gpad)** (b)	**Total Annual Demand (AFY)**
Potable Water Demand			
Residential – low density	27.53	1,890	58.3
Residential – medium and high density	45.78	2,520	129.2
Light industrial (d)	9.11	1,080	11.0
Commercial/mixed use (d)	8.78	1,080	10.6
Total Potable Water Demand			**209.2**
Recycled Water Demand			
Residential – low density (e)	27.73	0	0
Residential – medium and high density (e)	45.78	0	0
Light industrial (d)	9.11	270	2.8
Commercial/mixed use (d)	8.78	270	2.7
Park and landscaping	17.76	2,009	40.0
Total Recycled Water Demand			**45.4**
Total Water Demand			**255**

Notes:
All values rounded.
(a) Development Planning Services, July 2019. Project also includes approximately 41 acres of roadways and storm water detention basins.
(b) Source: Oxnard, 2007, Teal Club Development Infrastructure Review, Tables 3-1 and 3-2.
(c) Includes demand reduction of 10% to convert to 2019 standards and use of high-efficiency water conservation measures.
(d) Includes demand split of 80% potable water for indoor uses and 20% recycled water for landscape irrigation.
(e) City of Oxnard does not currently approve of recycled water to be piped to single-family and multiple-family residential parcels.

3.4.2 Project Water Demand Estimated by City

City staff estimated the water demand for the Project using significantly higher daily demand factors as compared with the estimated water demand prepared by the Project Proponents. Table 3-4 indicates an estimated Project total water demand of 447 AFY, including 421 AFY of potable water and 26 AFY of recycled water. Project total water demand at full build-out represents approximately 1.7 percent of the City's 2015 total demand (based on 26,028 AFY; Oxnard, 2016) and approximately 0.9 percent of the City's estimated 2040 total water demand (based on 52,225 AFY; Oxnard, 2016). Estimated total water demand for the Project at full build-out represents approximately 1.7 percent of the estimated increase in City water demand over the next 20 years (difference is 26,197 AFY; 2015 total demand compared to 2040 total demand; Oxnard, 2016).

TABLE 3-4
PROJECT WATER DEMAND ESTIMATED BY CITY STAFF

Sector	Acres (a)	Daily Demand Factor (gpad) (b)	Total Annual Demand (AFY)
Potable Water Demand			
Residential – low density	27.53	2,250	69.4
Residential – medium and high density	45.78	6,000	307.7
Light industrial (c)	9.11	2,800	28.6
Commercial/mixed use (d)	8.78	1,600	15.7
Total Potable Water Demand			**421.4**
Recycled Water Demand			
Residential – low density (e)	27.73	0	0
Residential – medium and high density (e)	45.78	0	0
Light industrial (c)	9.11	700	7.1
Commercial/mixed use (d)	8.78	400	3.9
Park and landscaping	17.76	750	14.9
Total Recycled Water Demand			**26.0**
Total Water Demand			**447**

Notes:
All values rounded.
(a) Development Planning Services, July 2019. Project also includes approximately 41 acres of roadways and storm water detention basins.
(b) Source: Oxnard, 2017, Public Works Integrated Master Plan, Project Memorandum 2.2, Table 5.
(c) Demand represents 3,500 gpad with 80% potable water for indoor uses and 20% recycled water for landscape irrigation.
(d) Demand represents 2,000 gpad with 80% potable water for indoor uses and 20% recycled water for landscape irrigation.
(e) City of Oxnard does not currently approve of recycled water to be piped to single-family and multiple-family residential parcels

3.5 Future City Water Demand

The City's UWMP (Oxnard, 2016) provided projected water demands based on current demands, development projects that are under construction, and projects in the planning process. Table 3-2 indicates that the City's water demand is projected to increase to approximately 52,225 AFY by 2040. Future water demands for the Project are included in the City's future demand estimate.

3.6 City Water Neutrality Policy

The City's water neutrality policy is not codified, which means that Oxnard may choose to approve a project regardless of its water neutrality status (Oxnard, 2017). However, the City has been making planning and permitting decisions pursuant to the water neutrality policy since 2008 and it is therefore assumed that a project needs to present a plan for water neutrality. The neutrality policy requires that all new development approved in the city must offset its water demand with a supplemental water supply. "New development" includes all planned (anticipated in the current General Plan) and any unplanned future development occurring in the City. Under the policy, a development can be water neutral by meeting its projected demand through one or more of following: (1) existing Fox Canyon Groundwater Management Agency (FCGMA) groundwater allocations that are transferred to the city; (2) contributing to increased efficiency by funding water conservation or recycled water retrofit projects; (3) providing additional water supplies; or (4) any combination of these options. The Project Proponents anticipate complying with the premise of the City's Water Neutrality Policy via transfer of ground water extraction allocations to the City (see Section 3.7).

3.7 Evaluation of Project and Ground Water Transfer

Project Proponents anticipate compliance with the City's Water Neutrality Policy (see Section 3.6). It is understood that the Project Proponents will transfer ground water allocations to the City upon final approval of the Project. The FCGMA Ordinance Code allows a transfer of extraction allocations for conversion of agricultural land to municipal land. The current transfer rate is 1 AFY of extraction allocation per 1 AFY of irrigation extraction (FCGMA, 2019).

The proposed Project is anticipated to transfer to the City approximately 500 AFY of ground water extraction allocations via agriculture land converted to urban uses. This transfer will result in a net increase of approximately 245 AFY for the City (500 AFY allocations transferred by the Project – 255 AFY Project demand = 245 AFY net increase) which may generate additional revenue for the City. However, the FCGMA may require adjustments to the final amount of extraction allocations transferred to the City.

SECTION 4: WATER SUPPLY RELIABILITY

4.1 WSA Requirements

The WSA must comply with the following California Water Code requirements:

> 10910(c)(3) If the projected water demand associated with the proposed project was not accounted for in the most recently adopted urban management plan, or the public water system has no urban water management plan, the water supply assessment for the project shall include a discussion with regard to whether the public water system's total projected water supplies available during normal, single dry, and multiple dry water years during a 20-year projection will meet the projected water demand associated with the proposed project, in addition to the public water system's existing and planned future uses, including agricultural and manufacturing uses.
>
> (4) If the city or county is required to comply with this part pursuant to subdivision (b), the water supply assessment for the project shall include a discussion with regard to whether the total projected water supplies, determined to be available by the city or county for the project during normal, single dry, and multiple dry years during a 20-year projection, will meet the projected water demand associated with the proposed project, in addition to existing and planned future uses, including agricultural and manufacturing uses.

4.2 Introduction

Water supply reliability is commonly defined as "how much one can count on a certain amount of water being delivered to a specific place at a specific time". Reliability planning requires significant details about, but not limited to, the following: (1) availability of each water supply from the source; (2) current and future demand forecasts; (3) current and future weather forecasts; (4) anticipated frequency and severity of shortages due to regulatory constraints; (5) shortages due to failure of extraction, treatment, conveyance, and storage facilities; and (6) how available contingency measures can reduce the impact of shortages when they occur.

As previously described, the City of Oxnard will provide potable water for the Project. Anticipated future water supplies include SWP water, UWCD ground water, City ground water, and recycled water. City future imported surface water supply projections assume normal inflows from the Sacramento Delta for SWP water and normal deliveries by MWDSC and CMWD. The City utilized SWP delivery estimates for future SWP water supply reliability based on best available data from DWR, MWDSC, and CMWD.

4.3 Reliability Comparison

The Water Code requires an assessment of water supply reliability and vulnerability to seasonal or climatic shortage (CA Water Code, Section 10910). This assessment must include a comparison of the total projected water demand with the supply available for the following conditions: (1) average or normal water-year, (2) single dry water-year, and (3) three consecutive dry water-years (multiple dry water-years). Additional details are provided in the Oxnard UWMP (Oxnard, 2016).

4.3.1 Normal Water-Year Supply and Demand

Table 4-1 provides a summary of the City's projected 20-year water supplies for a normal water-year condition. Table 4-1 indicates that the City has a projected supply of 40,341 to 54,341 AFY during a normal water-year for the period 2020 to 2040 (Oxnard, 2016). Current City demands were estimated to be 39,664 to 52,225 AFY. The City projects a supply surplus range of 677 AFY (2020) to 6,287 AFY (2025).

TABLE 4-1
PROJECTED SUPPLY AND DEMAND COMPARISON – NORMAL WATER-YEAR

	2020	2025	2030	2035	2040
Total Estimated Supplies (a)	40,341	54,341	54,341	54,341	54,341
Total Estimated Demand (a)	39,664	48,054	49,445	50,835	52,225
Difference = Supply - Demand	**677**	**6,287**	**4,896**	**3,506**	**2,116**

Notes:
All values rounded in AFY.
(a) Source: Oxnard, 2016.

4.3.2 Single Dry-Year Supply and Demand

Table 4-2 provides a summary of the City's projected 20-year water supplies for a single dry water-year condition. Table 4-2 indicates that the City has a projected supply of 39,247 to 52,867 AFY during a single dry-year for the period 2020 to 2040 (Oxnard, 2016). Current City demands, with implementation of conservation programs, were estimated to be 39,664 to 52,225 AFY. The City projects a supply difference range of minus 417 AFY (2020) to supply surplus of 4,813 AFY (2025). The City may need to consider additional water supplies to meet future water demands in single dry water-years with supply deficits. These supplies may include but not limited to the following: additional ground water production and desalted ground water, additional purchases from UWCD and CMWD, water from the ASR program, additional recycled water, water from indirect potable water reuse, and water from direct potable reuse.

TABLE 4-2
PROJECTED SUPPLY AND DEMAND COMPARISON – SINGLE DRY-YEAR

	2020	2025	2030	2035	2040
Total Estimated Supplies (a)	39,247	52,867	52,867	52,867	52,867
Total Estimated Demand (a)	39,664	48,054	49,445	50,835	52,225
Difference = Supply - Demand	**(417)**	**4,813**	**3,422**	**2,032**	**642**

Notes:
All values rounded in AFY.
(a) Source: Oxnard, 2016.

4.3.3 Multiple Dry Water-Years Supply and Demand

Table 4-3 provides a summary of the City's projected 20-year water supplies for a multiple dry water-years condition. Table 4-3 indicates that the City has a projected supply of 36,383 to 52,206 AFY during a multiple dry-year condition for the period 2020 to 2040 (Oxnard, 2016). City demands were estimated to be 39,664 to 52,225 AFY. The City projects a supply difference range of minus 3,281 AFY (2020) to supply surplus of 4,152 AFY (2025). The City may need to consider additional water supplies to meet future water demands in multiple dry water-years with supply deficits. These supplies may include but not limited to the following: additional ground water production and desalted ground water, additional purchases from UWCD and

CMWD, water from the ASR program, additional recycled water, water from indirect potable water reuse, and water from direct potable reuse.

TABLE 4-3
PROJECTED SUPPLY AND DEMAND COMPARISON – MULTIPLE DRY-YEARS

	2020	2025	2030	2035	2040
Year 1 Total Estimated Supplies (a)	38,756	52,206	52,206	52,206	52,206
Year 1 Total Estimated Demand (a)	39,664	48,054	49,445	50,835	52,225
Year 1 Difference = Supply - Demand	**(908)**	**4,152**	**2,761**	**1,371**	**(19)**
Year 2 Total Estimated Supplies (a)	38,426	51,762	51,762	51,762	51,762
Year 2 Total Estimated Demand (a)	39,664	48,054	49,445	50,835	52,225
Year 2 Difference = Supply - Demand	**(1,238**	**3,708**	**2,317**	**927**	**(463)**
Year 3 Total Estimated Supplies (a)	36,383	49,009	49,009	49,009	49,009
Year 3 Total Estimated Demand (a)	39,664	48,054	49,445	50,835	52,225
Year 3 Difference = Supply - Demand	**(3,281**	**955**	**(436)**	**(1,826)**	**(3,216)**

Notes:
All values rounded in AFY.
(a) Source: Oxnard, 2016.

4.4 City Water Supply Shortages

The City has established diverse approaches to meeting future water demands including: facility improvements and increased deliveries of local ground water; increased deliveries of imported water; implementing a recycled water program; and supporting water demand management programs. This has allowed the City, to date, to meet demands in spite of drought conditions. Water shortages can be triggered by a hydrologic limitation in supply (i.e., a prolonged period of below normal precipitation and runoff), regulatory constraint, catastrophic event, and limitation or failure of supply and treatment infrastructure. Hydrologic or drought limitations tend to develop and abate more slowly. Whereas, infrastructure failure, regulatory constraint, and a catastrophic event tend to happen quickly and relatively unpredictably (Oxnard, 2016).

Ordinances approved by the City established permanent water conservation standards to maximize water use efficiency for non-shortage conditions and refines response actions implemented during water shortage conditions. The conservation resulting from improved water use efficiency, and water shortage response actions supported by City Ordinance, should help ensure a reliable and sustainable minimum supply of water for the public health, safety and welfare by maintaining local and imported water resources (Oxnard, 2016).

As defined in the Oxnard City Code, during a declared water shortage condition the water sources available to the City will be put to the maximum beneficial use to the greatest extent possible. Priorities for use of available water, based on California Water Code, include the following:

- Health and Safety: Interior residential, sanitation and fire protection
- Commercial, Industrial, and Governmental: Maintain jobs and economic base

- Existing Landscaping: Especially trees and shrubs
- New Demand: Projects with permits when shortage declared.

The waste or unreasonable use of water will be prevented, and water supplies available will be conserved for public welfare in the interests of City residents. Primary purpose of the Ordinance is to provide response actions for use during water shortages, including procedures that will significantly reduce the consumption of City water over an extended period. The aim is to extend the water available to City residents while reducing the hardship on the City and the general public to the greatest extent possible.

After determining the severity of the water shortage emergency, the City Council will establish, by resolution, water conservation goals by stages. Immediately after adoption of a City Council resolution declaring the water conservation goals, water allocations will be in effect and customers will be prohibited from using water in excess of their allocation. Each customer will be solely responsible for managing his/her water uses in such a manner as to not exceed the amount of water allocated. Percentage reduction stages and goals will be in effect with the first full billing period commencing on or after the effective date of the City Council resolution adopting a water shortage plan. During a water shortage emergency, the City Manager will take specific actions in response to the failure of any customer to comply with established water use restrictions.

The City may need to consider additional water supplies to meet future water demands in years with supply deficits. These supplies may include but not limited to the following: additional ground water production and desalted ground water, additional purchases from UWCD and CMWD, water from the ASR program, additional recycled water, water from indirect potable water reuse, and water from direct potable reuse.

4.5 Effects of Global Climate Change

4.5.1 Introduction

Current climate change projections suggest that California will continue to enjoy a Mediterranean climate with the typical seasonal pattern of relatively cool and wet winters and hot, dry summers. However, climate patterns are different now and may continue to change at an accelerated pace. Increases in global emissions of greenhouse gases are leading to serious consequences for California including, but not limited to, the following: higher air and water temperatures, rising sea levels, increased droughts and floods, decreased amount and duration of snow pack, and extreme variability in weather patterns (DWR, 2013; California Natural Resources Agency, CANRA, 2009). These changes are anticipated to intensify over the 20-year planning horizon of this Assessment. Even if all emissions of greenhouse gases ceased today, some of these developments would be unavoidable because of the increase in greenhouse gases recorded over the last 100 years and the fact that the climate system changes slowly (Public Policy Institute of California, PPIC, 2011). Many of these climate changes would affect the availability, volume, and quality of California water supplies.

4.5.2 Potential Impacts of Climate Change

State and local water supplies and water demands may be impacted by climate change via one or more processes including precipitation, air temperature, runoff, sea level change, and flooding. Rainfall variability is expected to increase, leading to more frequent droughts and floods. Runoff from snowpack may be earlier and less predictable, and precipitation may fall as more rain and less snow. Air temperatures in California are anticipated to increase by 2 to 9 degrees Fahrenheit by the year 2100 (CANRA, 2009). Higher air temperatures may result in more rain and less snow, diminishing the reserves of water held in the Sierra Nevada snowpack (CANRA, 2009). Spring runoff from snowpack is occurring earlier now than it did in the first part of the 20th century. This change in runoff could affect availability of spring and summer snowmelt from mountain areas, including State Water Project water from the Sacramento Delta and local rivers and streams. Total annual exports from the Delta for State and Federal contractors may also decrease by 20 to 25 percent by the year 2100 (California Climate Change Center, CCCC, 2009).

Sea levels have risen by as much as 7 inches along the California coast over the last century (CANRA, 2009). According to some estimates, sea level is projected to rise an additional 2 to 5 feet by 2100 (PPIC, 2011; Pacific Institute, 2009; CANRA, 2009; Climate Action Team, CAT, 2008). These sea level increases could significantly impact infrastructure within coastal areas and affect quantity and timing of State Water Project water exports from the Sacramento Delta. Effects of sea level rise in the Delta would be two-fold: (1) problems with weak levees protecting the low-lying land, many already below sea level; and (2) increased salinity intrusion from the ocean which could degrade fresh water transfer supplies pumped at the southern edge of the Delta or require more fresh water releases to repel ocean salinity.

The DWR Water Plan includes an assessment of the impacts of global climate change on the State's water supply was conducted using a series of computer models based on decades of scientific research (DWR, 2013). Model results for California indicate a significant likelihood of increased temperature, reduction in Sierra snow depth, early snow melt, and a rise in sea level. These changing hydrological conditions could affect future planning efforts which are typically based on historic conditions. Difficulties in water supplies planning that may arise include, but are not limited to, the following:

- hydrological conditions, variability, and extremes that are different than what current water systems were designed to manage.
- changes occurring too rapidly to allow sufficient time and information to permit managers to respond appropriately.
- special efforts or plans to protect against surprises and uncertainties.

As such, DWR will continue to provide updated results from these models as further research is completed and new information becomes available.

4.5.3 Potential Effects of Climate Change on Water Demand

Climate change may increase daytime and nighttime temperatures and seasonal temperatures. This change may impact the length of the growing season. This general increase in temperatures coupled with greater variability and unpredictability in precipitation is expected to lead to increases in evapotranspiration resulting from warmer seasons; thereby creating an increase in demand for irrigation water and an increase in the year-to-year variability of demand.

Temperate fruit and nut trees such as almonds, pistachios, and apples require adequate winter chill to produce economically viable yields. Increased temperatures daytime, nighttime, and season temperatures may reduce winter chill hours thereby causing adverse effects on the yield of some crops. Some farmers are beginning to overcome this change by planting trees closer together and using new varieties.

Studies are now underway to prepare farmers for the likely impacts of climate change. Such efforts include breeding varieties of fruit trees which can withstand the decreased water chill hours, developing tools to aid the crops in coping with insufficient chill, and researching the temperature responses of orchard crops to better understand potential long-term effects. However, some solutions such as replanting orchards with altered crop varieties or the installation of aiding tools may not be feasible for many irrigators.

4.5.4 Mitigation and Adaptation

Responding to climate change generally takes two forms: mitigation and adaptation. Mitigation is taking steps to reduce human contribution to the causes of climate change by reducing greenhouse gas (GHG) emissions. Adaptation is the process of responding to the effects of climate change by modifying our systems and behaviors to function in a warmer climate (DWR, 2013).

In the water sector, climate change mitigation is generally achieved by reducing energy use, becoming more efficient with energy use, and/or substituting renewable energy sources in place of fossil fuel-based energy sources. Because water requires energy to move, treat, use, heat, and discharge, water conservation is also energy conservation. As each water supplier implements water conservation measures and determines its water conservation targets, it can also calculate conserved energy and GHGs not-emitted as a side benefit. Once a water supplier has calculated the water conserved by a best management practice (BMP), it is straightforward to convert that volume to conserved energy, and GHGs not-emitted. Additionally, water suppliers may want to focus on implementing water conservation measures that conserve water but do so at a significant decrease in GHG emissions as compared with other measures (DWR, 2013).

Climate change means more than hotter days. Continued warming of the climate system has considerable impact on the operation of most water districts. Snow in the Sierra Nevada provides 65 percent of California's water supply. Predictions indicate that by 2050 the Sierra snowpack will be significantly reduced. Much of the lost snow will fall as rain, which flows quickly down the mountains during winter and cannot be stored in our current water system for use during California's hot, dry summers. The climate is also expected to become more variable, bringing more droughts and floods. Water districts will have to adapt to new, more variable conditions (DWR, 2013).

Principles of climate change adaptation include the following:

- As more mitigation is completed now, the less adaptation we may have to do in the future, because climate impacts could be less severe.
- Mitigation is much less expensive than adaptation.
- Mitigation should happen globally.
- Adaptation must happen locally.
- Adaptation strategies should be implemented according to future conditions, regular assessment and recalibration.
- Some adaptation strategies have benefits that can be realized today.

4.5.5 Local Strategies

As climate change continues to unfold in the coming decades, water agencies may need to mitigate and adapt to new strategies, which may require reevaluating existing agency missions, policies, regulations, facilities, funding priorities, and other responsibilities. Examples of mitigation and adaptation strategies include, but not limited to, the following:

- Prepare long-term facility and sustainability master plans including specific elements for climate change adaptation.
- Increase ground water recharge using additional surface water and recycled water.
- Increase recycled water demands.
- Promote additional water use efficiency for urban, commercial, and industrial best management practices.
- Implement proposed indirect potable water reuse program and direct potable reuse program.
- Increase investments in infrastructure that promotes adaptation strategies (such as ground water recharge, and recycled water) and existing principal facilities susceptible to impacts of climate change.

Notwithstanding the above strategies for dealing with climate change, the reality is that current environmental regulations place a very high priority on releasing additional water for endangered species (i.e., Sacramento River and San Joaquin River) and the environment. The potential for increased water demand for environmental resources and the possibility of reduced water supplies will be one of the biggest challenges confronting water agencies.

The goal of the City is to utilize the available surface water and ground water supplies as effectively as possible in meeting the requirements of the customers water demands. It is worth noting, however, that the City's control over water supplies is limited; thus, management practice changes will need to be adaptive in nature.

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SECTION 5: SUMMARY AND CONCLUSIONS

This Water Supply Assessment (WSA) was prepared to assist the Project Proponents in satisfying the requirements of SB 610/California Water Code and supplement the Project DEIR. The WSA included a review of local Urban Water Management Plans, local planning documents, and the water requirements for the subject Project.

The proposed Project by Borchard Ownership Interests (Project Proponents) will involve annexation of the approximately 150-acre (gross) project area to the City of Oxnard, and adoption of an updated Teal Club Specific Plan (in progress, anticipated completion date of second quarter 2019). Current Ventura County General Plan land use and zoning designations for the project area are Agricultural and Agricultural Exclusive. The proposed Teal Club Specific Plan designates residential, retail commercial, business/research park, parks, and public facilities uses (see Figure 1-2). A central focus of this development will be in the provision of balanced community with jobs, recreation, shopping, and affordable and market-rate housing. The 2030 General Plan land use map designates the project site for an Urban Village, thereby encouraging neo-traditional town planning with a focus on sustainability and transit-oriented development.

The Project Proponents propose to complete one of three versions of the Teal Club Project. The three versions are named “Project”, “Reduced Intensity Alternative”, and “Phase 1 Development Only Alternative”. Each of these versions are summarized below.

The “Project” will include the following major components:

- Approximately 150 total acres
- Up to 990 residential units in a variety of densities and product types on approximately 73 acres
- Up to 132,000 square feet of light industrial development on approximately 9 acres
- Up to 60,000 square feet of retail commercial uses on approximately 9 acres
- Approximately 18 acres of community park space, pocket parks, and greenbelts
- Approximately 41 acres of roadways and storm water detention basins.

The “Reduced Intensity Alternative” will include the following major components:

- Approximately 150 total acres
- Up to 990 residential units in a variety of densities and product types on approximately 86 acres
- Up to 50,000 square feet of retail commercial uses on approximately 9 acres
- Approximately 18 acres of community park space, pocket parks, and greenbelts
- . Approximately 38 acres of roadways and storm water detention basins.

The “Phase 1 Development Only Alternative” will include the following major components:

- Approximately 92 total acres
- Up to 723 residential units in a variety of densities and product types on approximately 53 acres
- Up to 60,000 square feet of retail commercial uses on approximately 9 acres
- Approximately 6.5 acres of park space and greenbelts
- Approximately 23 acres of roadways and storm water detention basins.

Project Proponents have a primary goal for this Project to be water neutral. To achieve neutrality, the Project needs to contribute water rights, water supplies, or financial or physical offsets to the City that ensure sufficient supply to address Project water demands. Options available may include transfers of FCGMA ground water extraction allocations to the City through agricultural conversion to municipal uses, participation in expansions of the City's recycled water system through physical or financial contributions, and or participation in water conservation projects that produce measurable and sustainable water savings. Non-potable water demands, to be met with City recycled water, will be metered separately. Another Project goal is that water supplies will consist of 100 percent local and sustainable sources including local ground water and recycled water.

Project Proponents estimated a Project total water demand of 255 AFY, including 210 AFY of potable water and 45 AFY of recycled water for landscape irrigation (see Table 3-3 for details). Project total water demand at full build-out represents approximately 1.0 percent of the City's 2015 total demand (based on 26,028 AFY; Oxnard, 2016) and approximately 0.5 percent of the City's estimated 2040 total water demand (based on 52,225 AFY; Oxnard, 2016). Estimated total water demand for the Project at full build-out represents approximately 1.0 percent of the estimated increase in City water demand over the next 20 years (difference is 26,197 AFY; 2015 total demand compared to 2040 projected total demand; Oxnard, 2016).

City staff estimated the water demand for the Project using significantly higher daily demand factors as compared with the estimated water demand prepared by the Project Proponents. Table 3-4 indicates an estimated Project total water demand of 447 AFY, including 421 AFY of potable water and 26 AFY of recycled water. Project total water demand at full build-out represents approximately 1.7 percent of the City's 2015 total demand (based on 26,028 AFY; Oxnard, 2016) and approximately 0.9 percent of the City's estimated 2040 total water demand (based on 52,225 AFY; Oxnard, 2016). Estimated total water demand for the Project at full build-out represents approximately 1.7 percent of the estimated increase in City water demand over the next 20 years (difference is 26,197 AFY; 2015 total demand compared to 2040 total demand; Oxnard, 2016).

Project Proponents anticipate compliance with the City's Water Neutrality Policy via transfer of ground water extraction allocations to the City (see Section 3.7). It is anticipated that the Project Proponents will transfer ground water extraction allocations to the City upon final approval of the Project. The FCGMA Ordinance Code allows ground water extraction allocations to be transferred when converting agricultural acreage to municipal/urban uses. The current transfer rate is 1 AFY of applicable agricultural extraction allocation to 1 AFY of municipal extraction allocation (FCGMA, 2019). The transfer process and allocations to be transferred will be subject to FCGMA review and approval.

Based on review of FCGMA Ordinances and discussions with the FCGMA staff, the City could potentially receive approximately 500 AFY of transferred ground water allocations via agriculture land converted to urban uses. This transfer will result in a net increase of approximately 245 AFY for the City (500 AFY allocations transferred by the Project – 255 AFY Project demand = 245 AFY net increase) which may generate additional revenue for the City. However, the FCGMA may require adjustments to the final amount of extraction allocations transferred to the City.

Based on the analysis provided in the City's Urban Water Management Plan (Oxnard, 2016), the City's total projected normal water-year water supplies available through the year 2040 will generally meet the City's projected water demands, including the Project, within the service area (see Table 4-1 for details). Under single dry water-year conditions (see Table 4-2 for details), the City anticipates that projected supplies will meet projected demands including the Project, in most years through the year 2040. For multiple dry water-year conditions, the City's projected water resources will meet the projected water demands including the Project, in most years through the year 2040 (see Table 4-3 for details). During years when deliveries of existing water supplies are below normal, the City anticipates implementing multiple strategies including but not limited to the following: 1) obtaining additional water resources via supplemental local ground water extractions, 2) additional purchases from local and regional suppliers, and 3) increasing water conservation and demand management measures.

The proposed Project will utilize local and sustainable water resources, including City potable water and City recycled water for landscape irrigation. The City has sufficient water supplies available to serve the Project from existing entitlements and resources during normal water-years (Oxnard, 2016). These water supplies are available via treated local ground water, imported surface water from the SWP, and recycled water. The proposed Project will transfer approximately 500 AFY of ground water extraction allocations to the City via agriculture land converted to urban uses. This transfer will result in creating additional ground water extraction allocations (i.e., exceeding demands) and potential additional revenue for the City. The proposed Project will not require additional ground water or surface water purchases from local or imported sources. The proposed Project will not require or result in the construction of significant additional City water facilities or expansion of existing facilities. Thus, the Project will be water neutral with respect to use of potable water and recycled water.

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APPENDICES

Appendix A

California Water Code – Section 10910-10915

CALIFORNIA CODES
WATER CODE
SECTION **10910-10915**

10910. (a) Any city or county that determines that a project, as defined in Section 10912, is subject to the California Environmental Quality Act (Division 13 (commencing with Section 21000) of the Public Resources **Code**) under Section 21080 of the Public Resources **Code** shall comply with this part.

(b) The city or county, at the time that it determines whether an environmental impact report, a negative declaration, or a mitigated negative declaration is required for any project subject to the California Environmental Quality Act pursuant to Section 21080.1 of the Public Resources **Code**, shall identify any **water** system that is, or may become as a result of supplying **water** to the project identified pursuant to this subdivision, a public **water** system, as defined in Section 10912, that may supply **water** for the project. If the city or county is not able to identify any public **water** system that may supply **water** for the project, the city or county shall prepare the **water** assessment required by this part after consulting with any entity serving domestic **water** supplies whose service area includes the project site, the local agency formation commission, and any public **water** system adjacent to the project site.

(c) (1) The city or county, at the time it makes the determination required under Section 21080.1 of the Public Resources **Code**, shall request each public **water** system identified pursuant to subdivision (b) to determine whether the projected **water** demand associated with a proposed project was included as part of the most recently adopted urban **water** management plan adopted pursuant to Part 2.6 (commencing with Section 10610).

(2) If the projected **water** demand associated with the proposed project was accounted for in the most recently adopted urban **water** management plan, the public **water** system may incorporate the requested information from the urban **water** management plan in preparing the elements of the assessment required to comply with subdivisions (d), (e), (f), and (g).

(3) If the projected **water** demand associated with the proposed project was not accounted for in the most recently adopted urban **water** management plan, or the public **water** system has no urban **water** management plan, the **water** supply assessment for the project shall include a discussion with regard to whether the public **water** system's total projected **water** supplies available during normal, single dry, and multiple dry **water** years during a 20-year projection will meet the projected **water** demand associated with the proposed project, in addition to the public **water** system's existing and planned future uses, including agricultural and manufacturing uses.

(4) If the city or county is required to comply with this part pursuant to subdivision (b), the **water** supply assessment for the project shall include a discussion with regard to whether the total projected **water** supplies, determined to be available by the city or county for the project during normal, single dry, and multiple dry **water** years during a 20-year projection, will meet the projected **water** demand associated with the proposed project, in addition to existing and planned future uses, including agricultural and manufacturing uses.

(d) (1) The assessment required by this section shall include an identification of any existing **water** supply entitlements, **water** rights, or **water** service contracts relevant to the identified **water** supply for the proposed project, and a description of the quantities of **water** received in prior years by the public **water** system, or the city or county if either is required to comply with this part pursuant to subdivision (b), under the existing **water** supply entitlements, **water** rights, or **water** service contracts.

(2) An identification of existing **water** supply entitlements, **water** rights, or **water** service contracts held by the public **water** system, or the city or county if either is required to comply with this part pursuant to subdivision (b), shall be demonstrated by providing information related to all of the following:

(A) Written contracts or other proof of entitlement to an identified **water** supply.

(B) Copies of a capital outlay program for financing the delivery of a **water** supply that has been adopted by the public **water** system.

(C) Federal, state, and local permits for construction of

necessary infrastructure associated with delivering the **water** supply.
(D) Any necessary regulatory approvals that are required in order to be able to convey or deliver the **water** supply.
(e) If no **water** has been received in prior years by the public **water** system, or the city or county if either is required to comply with this part pursuant to subdivision (b), under the existing **water** supply entitlements, **water** rights, or **water** service contracts, the public **water** system, or the city or county if either is required to comply with this part pursuant to subdivision (b), shall also include in its **water** supply assessment pursuant to subdivision (c), an identification of the other public **water** systems or **water** service contractholders that receive a **water** supply or have existing **water** supply entitlements, **water** rights, or **water** service contracts, to the same source of **water** as the public **water** system, or the city or county if either is required to comply with this part pursuant to subdivision (b), has identified as a source of **water** supply within its **water** supply assessments.
(f) If a **water** supply for a proposed project includes groundwater, the following additional information shall be included in the **water** supply assessment:
(1) A review of any information contained in the urban **water** management plan relevant to the identified **water** supply for the proposed project.
(2) A description of any groundwater basin or basins from which the proposed project will be supplied. For those basins for which a court or the board has adjudicated the rights to pump groundwater, a copy of the order or decree adopted by the court or the board and a description of the amount of groundwater the public **water** system, or the city or county if either is required to comply with this part pursuant to subdivision (b), has the legal right to pump under the order or decree. For basins that have not been adjudicated, information as to whether the department has identified the basin or basins as overdrafted or has projected that the basin will become overdrafted if present management conditions continue, in the most current bulletin of the department that characterizes the condition of the groundwater basin, and a detailed description by the public **water** system, or the city or county if either is required to comply with this part pursuant to subdivision (b), of the efforts being undertaken in the basin or basins to eliminate the long-term overdraft condition.
(3) A detailed description and analysis of the amount and location of groundwater pumped by the public **water** system, or the city or county if either is required to comply with this part pursuant to subdivision (b), for the past five years from any groundwater basin from which the proposed project will be supplied. The description and analysis shall be based on information that is reasonably available, including, but not limited to, historic use records.
(4) A detailed description and analysis of the amount and location of groundwater that is projected to be pumped by the public **water** system, or the city or county if either is required to comply with this part pursuant to subdivision (b), from any basin from which the proposed project will be supplied. The description and analysis shall be based on information that is reasonably available, including, but not limited to, historic use records.
(5) An analysis of the sufficiency of the groundwater from the basin or basins from which the proposed project will be supplied to meet the projected **water** demand associated with the proposed project. A **water** supply assessment shall not be required to include the information required by this paragraph if the public **water** system determines, as part of the review required by paragraph (1), that the sufficiency of groundwater necessary to meet the initial and projected **water** demand associated with the project was addressed in the description and analysis required by paragraph (4) of subdivision (b) of Section 10631.
(g) (1) Subject to paragraph (2), the governing body of each public **water** system shall submit the assessment to the city or county not later than 90 days from the date on which the request was received. The governing body of each public **water** system, or the city or county if either is required to comply with this act pursuant to subdivision (b), shall approve the assessment prepared pursuant to this section at a regular or special meeting.
(2) Prior to the expiration of the 90-day period, if the public **water** system intends to request an extension of time to prepare and adopt the assessment, the public **water** system shall meet with the city or county to request an extension of time, which shall not exceed 30 days, to prepare and adopt the assessment.
(3) If the public **water** system fails to request an extension of time, or fails to submit the assessment notwithstanding the extension

of time granted pursuant to paragraph (2), the city or county may seek a writ of mandamus to compel the governing body of the public **water** system to comply with the requirements of this part relating to the submission of the **water** supply assessment.

(h) Notwithstanding any other provision of this part, if a project has been the subject of a **water** supply assessment that complies with the requirements of this part, no additional **water** supply assessment shall be required for subsequent projects that were part of a larger project for which a **water** supply assessment was completed and that has complied with the requirements of this part and for which the public **water** system, or the city or county if either is required to comply with this part pursuant to subdivision (b), has concluded that its **water** supplies are sufficient to meet the projected **water** demand associated with the proposed project, in addition to the existing and planned future uses, including, but not limited to, agricultural and industrial uses, unless one or more of the following changes occurs:

(1) Changes in the project that result in a substantial increase in **water** demand for the project.

(2) Changes in the circumstances or conditions substantially affecting the ability of the public **water** system, or the city or county if either is required to comply with this part pursuant to subdivision (b), to provide a sufficient supply of **water** for the project.

(3) Significant new information becomes available which was not known and could not have been known at the time when the assessment was prepared.

10911. (a) If, as a result of its assessment, the public **water** system concludes that its **water** supplies are, or will be, insufficient, the public **water** system shall provide to the city or county its plans for acquiring additional **water** supplies, setting forth the measures that are being undertaken to acquire and develop those **water** supplies. If the city or county, if either is required to comply with this part pursuant to subdivision (b), concludes as a result of its assessment, that **water** supplies are, or will be, insufficient, the city or county shall include in its **water** supply assessment its plans for acquiring additional **water** supplies, setting forth the measures that are being undertaken to acquire and develop those **water** supplies. Those plans may include, but are not limited to, information concerning all of the following:

(1) The estimated total costs, and the proposed method of financing the costs, associated with acquiring the additional **water** supplies.

(2) All federal, state, and local permits, approvals, or entitlements that are anticipated to be required in order to acquire and develop the additional **water** supplies.

(3) Based on the considerations set forth in paragraphs (1) and (2), the estimated timeframes within which the public **water** system, or the city or county if either is required to comply with this part pursuant to subdivision (b), expects to be able to acquire additional **water** supplies.

(b) The city or county shall include the **water** supply assessment provided pursuant to Section **10910**, and any information provided pursuant to subdivision (a), in any environmental document prepared for the project pursuant to Division 13 (commencing with Section 21000) of the Public Resources **Code**.

(c) The city or county may include in any environmental document an evaluation of any information included in that environmental document provided pursuant to subdivision (b). The city or county shall determine, based on the entire record, whether projected **water** supplies will be sufficient to satisfy the demands of the project, in addition to existing and planned future uses. If the city or county determines that **water** supplies will not be sufficient, the city or county shall include that determination in its findings for the project.

10912. For the purposes of this part, the following terms have the following meanings:

(a) "Project" means any of the following:

(1) A proposed residential development of more than 500 dwelling units.

(2) A proposed shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space.

(3) A proposed commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space.
(4) A proposed hotel or motel, or both, having more than 500 rooms.
(5) (A) Except as otherwise provided in subparagraph (B), a proposed industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area.
(B) A proposed photovoltaic or wind energy generation facility approved on or after the effective date of the amendments made to this section at the 2011-12 Regular Session is not a project if the facility would demand no more than 75 acre-feet of **water** annually.
(6) A mixed-use project that includes one or more of the projects specified in this subdivision.
(7) A project that would demand an amount of **water** equivalent to, or greater than, the amount of **water** required by a 500 dwelling unit project.
(b) If a public **water** system has fewer than 5,000 service connections, then "project" means any proposed residential, business, commercial, hotel or motel, or industrial development that would account for an increase of 10 percent or more in the number of the public **water** system's existing service connections, or a mixed-use project that would demand an amount of **water** equivalent to, or greater than, the amount of **water** required by residential development that would represent an increase of 10 percent or more in the number of the public **water** system's existing service connections.
(c) "Public **water** system" means a system for the provision of piped **water** to the public for human consumption that has 3,000 or more service connections. A public **water** system includes all of the following:
(1) Any collection, treatment, storage, and distribution facility under control of the operator of the system that is used primarily in connection with the system.
(2) Any collection or pretreatment storage facility not under the control of the operator that is used primarily in connection with the system.
(3) Any person who treats **water** on behalf of one or more public **water** systems for the purpose of rendering it safe for human consumption.
(d) This section shall remain in effect only until January 1, 2017, and as of that date is repealed, unless a later enacted statute, that is enacted before January 1, 2017, deletes or extends that date.

10912. For the purposes of this part, the following terms have the following meanings:
(a) "Project" means any of the following:
(1) A proposed residential development of more than 500 dwelling units.
(2) A proposed shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space.
(3) A proposed commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space.
(4) A proposed hotel or motel, or both, having more than 500 rooms.
(5) A proposed industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area.
(6) A mixed-use project that includes one or more of the projects specified in this subdivision.
(7) A project that would demand an amount of **water** equivalent to, or greater than, the amount of **water** required by a 500 dwelling unit project.
(b) If a public **water** system has fewer than 5,000 service connections, then "project" means any proposed residential, business, commercial, hotel or motel, or industrial development that would account for an increase of 10 percent or more in the number of the public **water** system's existing service connections, or a mixed-use project that would demand an amount of **water** equivalent to, or greater than, the amount of **water** required by residential development that would represent an increase of 10 percent or more in the number of the public **water** system's existing service connections.
(c) "Public **water** system" means a system for the provision of piped **water** to the public for human consumption that has 3,000 or

more service connections. A public **water** system includes all of the following:

(1) Any collection, treatment, storage, and distribution facility under control of the operator of the system that is used primarily in connection with the system.

(2) Any collection or pretreatment storage facility not under the control of the operator that is used primarily in connection with the system.

(3) Any person who treats **water** on behalf of one or more public **water** systems for the purpose of rendering it safe for human consumption.

(d) This section shall become operative on January 1, 2017.

10914. (a) Nothing in this part is intended to create a right or entitlement to **water** service or any specific level of **water** service.

(b) Nothing in this part is intended to either impose, expand, or limit any duty concerning the obligation of a public **water** system to provide certain service to its existing customers or to any future potential customers.

(c) Nothing in this part is intended to modify or otherwise change existing law with respect to projects which are not subject to this part.

(d) This part applies only to a project for which a notice of preparation is submitted on or after January 1, 1996.

10915. The County of San Diego is deemed to comply with this part if the Office of Planning and Research determines that all of the following conditions have been met:

(a) Proposition C, as approved by the voters of the County of San Diego in November 1988, requires the development of a regional growth management plan and directs the establishment of a regional planning and growth management review board.

(b) The County of San Diego and the cities in the county, by agreement, designate the San Diego Association of Governments as that review board.

(c) A regional growth management strategy that provides for a comprehensive regional strategy and a coordinated economic development and growth management program has been developed pursuant to Proposition C.

(d) The regional growth management strategy includes a **water** element to coordinate planning for **water** that is consistent with the requirements of this part.

(e) The San Diego County **Water** Authority, by agreement with the San Diego Association of Governments in its capacity as the review board, uses the association's most recent regional growth forecasts for planning purposes and to implement the **water** element of the strategy.

(f) The procedures established by the review board for the development and approval of the regional growth management strategy, including the **water** element and any certification process established to ensure that a project is consistent with that element, comply with the requirements of this part.

(g) The environmental documents for a project located in the County of San Diego include information that accomplishes the same purposes as a **water** supply assessment that is prepared pursuant to Section **10910**.

Appendix B

Fox Canyon Groundwater Management Agency – Groundwater Management Plan

2007 Update to the Fox Canyon Groundwater Management Agency Groundwater Management Plan

Prepared by

Fox Canyon Groundwater Management Agency
United Water Conservation District
Calleguas Municipal Water District

May 2007

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This Groundwater Management Plan was prepared by Steven Bachman, with extensive advice and reviews by Fox Canyon Groundwater Management Agency staff (Jeff Pratt, Gerhardt Hubner, Gerard Kapuscik, Christian Laber, David Panaro, and Sheila Lopez) and United Water Conservation District staff (Dana Wisehart, Ken Turner, Dan Detmer, Jim Kentosh, Murray McEachron, Pete Dal Pozzo, and John Dickenson). Lowell Preston (formerly of FCGMA), Curtis Hopkins (for Municipal and Industrial [M&I] providers), Rob Saperstein (for City of Oxnard), John Mathews (for Pleasant Valley County Water District), Tony Emmert (City of Oxnard), Lucia McGovern (City of Camarillo), John Powell (Saticoy Country Club), David Borchard (FCGMA Board Member), and Lawrence (Larry) Fuller provided additional comments and reviews.

EXECUTIVE SUMMARY

The Fox Canyon Groundwater Management Agency (FCGMA) was initially created to manage the groundwater in both overdrafted and potentially seawater-intruded areas within Ventura County. The prime objectives and purposes of the FCGMA are to preserve groundwater resources for agricultural, municipal, and industrial uses in the best interests of the public and for the common benefit of all water users. Protection of water quality and quantity along with maintenance of long-term water supply are included in those goals and objectives.

Initial goals of the FCGMA included balancing water supply and demand in the Upper Aquifer System (UAS) by the year 2000 and in the Lower Aquifer System (LAS) by year 2010. These goals and the FCGMA's basic purpose remain relatively unchanged today. The initial Groundwater Management Plan for the FCGMA was prepared in 1985. This current document is an update to that initial Plan. Since preparation of the initial Plan, significantly more is now known about the occurrence of the seawater intrusion and basin overdraft through focused monitoring programs, studies, and modeling. There has also been a period of time to observe how FCGMA policies and water conservation facilities have improved groundwater conditions.

The goals of this Management Plan are to set specific, measurable management objectives for each basin, identify strategies to reach these goals, and set future FCGMA policy to help implement these strategies. The FCGMA cannot itself build and operate conservation facilities, so the focus of this Plan is both on potential FCGMA policies and on strategies and policies that can assist in implementing conservation projects by other agencies. Thus, the FCGMA acts as a partner with the other agencies in improving conditions in the aquifers within the Agency.

The main focus of the initial Groundwater Management Plan was to contain seawater intrusion in the south Oxnard Plain basin. The combination of FCGMA policies and new water conservation facilities, which included the FCGMA pumping reductions, shifting of pumping from the Upper Aquifer System to the Lower Aquifer System, the construction of the Freeman Diversion, and the operation of the Pumping Trough and Pleasant Valley pipeline systems, has had a significant effect on seawater intrusion in at least a portion of the aquifers. The most significant effect was the reduction of the lobe of seawater in the Upper Aquifer System at Port Hueneme. Monitoring wells drilled into this lobe indicate that seawater intrusion has retreated and is no longer detectable in some areas near Port Hueneme, with groundwater in one well improving from near-seawater back to drinking-quality water.

However, the containment of saline waters is not complete. In the Pleasant Valley and south Oxnard Plain basins, saline waters both from the ocean and from adjacent fine-grained sediments have expanded the area of saline intrusion since 1985. This increase occurred in the Upper Aquifer System near Point Mugu and the Lower Aquifer System in the Port Hueneme and Point Mugu areas. Thus, continuation of current strategies and the implementation of additional strategies are required to fully contain saline intrusion.

Additional water quality problems have also been identified since the original FCGMA Plan was adopted. These include increasing chlorides and other salts in the South Las Posas basin and locally in the Pleasant Valley basin, as well as increased nitrates in the Forebay basin during periods of reduced rainfall and groundwater recharge.

This 2007 Update to the FCGMA Groundwater Management Plan discusses and reviews a number of aspects of groundwater management:

- background information on the groundwater basins;
- history of groundwater extractions within the FCGMA;
- water quality issues, both generally and basin-by-basin,
- basin management objectives to indicate the health of the basin and the efficacy of current and future management strategies;
- the yield of the groundwater basins;
- current management strategies and their effectiveness;
- management strategies under development and their potential effectiveness;
- potential future management strategies and their potential effectiveness; and
- recommended actions to be taken by the FCGMA.

In addition, three appendices include:

- progression of saline intrusion in the Upper and Lower Aquifers;
- description of the Ventura Regional Groundwater Model that was used to evaluate management strategies, as well as details of those evaluations; and
- East Las Posas Basin Management Plan, which deals with issues specific to that basin and that will be adopted as part of this Groundwater Management Plan.

Basin Management Objectives (BMOs) are defined for the basins within the FCGMA in this Plan. The BMOs are measurable groundwater elevation and water quality goals that, if reached, protect the aquifers from further saline intrusion and other water quality problems. The BMOs are set at particular key wells in the groundwater basins. Current groundwater conditions meet the BMO criteria in some, but not all of the basins. They fail to meet BMOs in the Lower Aquifer and portions of the Upper Aquifer in the Oxnard Plain and Pleasant Valley basins, periodically in the Forebay basin, and locally in the Las Posas and Santa Rosa basins. Using the Ventura Regional Groundwater Model to evaluate the effectiveness of management strategies into the future, current management strategies are predicted to meet BMOs for groundwater elevations 51% of the time in the Upper Aquifer and only 5% of the time in the Lower Aquifer[*].

The annual yield of the basins within the FCGMA was calculated to be about 120,000 acre-feet (AF) for the 1985 Groundwater Management Plan. Current pumping within the FCGMA has decreased to something close to that number, however, and BMOs are not being met in key areas – which is consistent with the groundwater model results discussed in the previous paragraph. To recalculate the yield of the basin, groundwater pumping was progressively reduced in the model until BMOs were met on average 50% or more of the time. Pumping would have to be reduced to 100,000 acre-feet per year (AFY) to meet the BMOs, providing that these additional reductions were accomplished largely in the south Oxnard Plain and Pleasant Valley basins.

Because current management strategies are not sufficient to meet BMOs and pumping needs to be reduced to 100,000 AFY, additional management strategies need to be implemented. A series of these additional strategies are proposed in this Plan. Some of these strategies are currently being developed, whereas others would be implemented in the future. For strategies

[*] Percentage is based on the average number of quarters when BMOs are met at each BMO well during the 55-year modeling period of the Ventura Regional Groundwater Model. For an initial target, it is proposed that groundwater elevation BMOs be met at least 50% of the time, thus taking into account that climatic cycles will cause groundwater elevations to rise and fall periodically above and below these objectives.

that were amenable to being evaluated using the Ventura Regional Groundwater Model, the effectiveness in meeting BMOs was calculated.

The following table summarizes the proposed strategies; the strategies are grouped initially by when they could be implemented and secondarily within each time increment by their potential effectiveness in managing the basins and meeting BMOs.

Strategies Currently Under Development

- GREAT Project (recycled water for in-lieu delivery and direct injection)
- South Las Posas Pump/Treat (pump poor quality water and blend/treat it)
- Development Brackish Groundwater, Pleasant Valley (similar to previous, pumping from northern Pleasant Valley basin)
- Non-Export FCGMA Water (water pumped within FCGMA and applied in adjacent areas outside the Agency)
- Continuation of 25% Pump Reduction (continue original Plan strategy of 25% reductions by 2010)
- RiverPark Recharge (additional Santa Clara River recharge)

5-Year Strategies

- 5-Year Update of Plan
- Shift Pumping to UAS (prepare technical basis and policy)
- Protect Recharge (protect current sources of recharge)
- Limit Nitrates in the Forebay (land use, Best Management Practices)
- Recovery of Credits from the Forebay (uniform policy)
- Verification of Extraction Reporting (verify accuracy of reporting)
- Separate Strategies for Each Basin (as needed)
- FCGMA Boundary (adjust slightly to reflect new hydrogeologic understanding)
- Irrigation Efficiency (determine if warrants modifications)
- Additional Storage Projects (to help fill overdrafted basins)
- Penalties Used to Purchase Replacement Water (refill overpumped areas)
- Additional Water Conservation (encourage local agencies)
- Shelf Life for Conservation Credits (limit the long-term accumulation of credits and/or limit number of credits pumped in any one year)

10-Year Strategies

- Additional In-lieu Deliveries to South Oxnard Plain
- Import Additional State Water (for direct or in-lieu recharge)
- Further Destruction of Abandoned or Leaking Wells
- Additional Monitoring Needs (as needed to track saline intrusion or other groundwater issues)

15-Year Strategies

- Barrier Wells in South Oxnard Plain
- Injection of Treated River Water into Overdrafted Basins
- Increase Diversions from Santa Clara River (additional water rights from peak storm flows)
- Shift Pumping to Northwest Oxnard Plain

Greater Than 15-Year Strategies

- Additional Reductions in Pumping Allocations (if strategies are not fully implemented or if they fail to meet BMO targets)

The Ventura Regional Groundwater Model was used to evaluate the effect of individual strategies, as well as the combination of strategies. If all the strategies are implemented as recommended (especially those ranked highest in each time horizon), the model predicts that BMOs for the Upper Aquifer will be met 67% of the time and BMOs for the Lower Aquifer will be met 76% of the time – a major improvement that would likely halt further degradation of groundwater quality.

This management plan calls for a set of actions to implement the recommended strategies. Some of these strategies can be implemented directly by the FCGMA through policy additions or modifications. Other strategies, especially those requiring infrastructure to be built, will be largely the responsibility of other organizations. To ensure that all the strategies are implemented as seamlessly as possible, it is recommended that there be a joint Strategic Planning and Implementation effort with the other agencies that will help implement the strategies in this Plan.

The importance of implementing the strategies in this Plan is illustrated by three potential choices that are available to the FCGMA, organizations, and groundwater pumpers:

- Implementation of recommended strategies in this Plan –resulting in major improvement in overdraft conditions and the potential halt in further degradation of groundwater quality; or
- Most effective strategies not implemented because of cost, lack of cooperation, lack of will – resulting in further FCGMA reductions in pumping allocations. Reductions of an additional 85% of pumping in the south Oxnard Plain and Pleasant Valley basins would be required to meet BMOs; or
- No effective management strategies are implemented and there are no further reductions in pumping allocations – the Lower Aquifer in the south Oxnard Plain and Pleasant Valley basins will degrade until it can no longer be pumped without expensive treatment prior to delivery of the groundwater.

TABLE OF CONTENTS

1.0 INTRODUCTION

The Fox Canyon Groundwater Management Agency (FCGMA) (Figure 1 and Plate 1) is located in Ventura County and encompasses several coastal basins that underlie the cities of Oxnard, Port Hueneme, Camarillo, and Moorpark. The Agency overlies about 118,000 acres (185 sq mi). The FCGMA was initially created to manage the groundwater in both overdrafted and potentially seawater-intruded areas within Ventura County. The prime objectives and purposes of the FCGMA are to preserve groundwater resources for agricultural, municipal, and industrial uses in the best interests of the public and for the common benefit of all water users. Protection of water quality and quantity along with maintenance of long-term water supply are included in those goals and objectives.

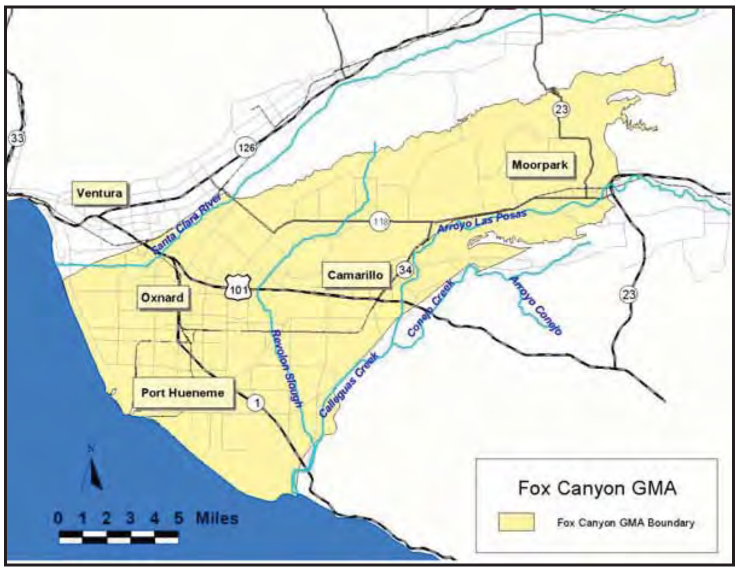
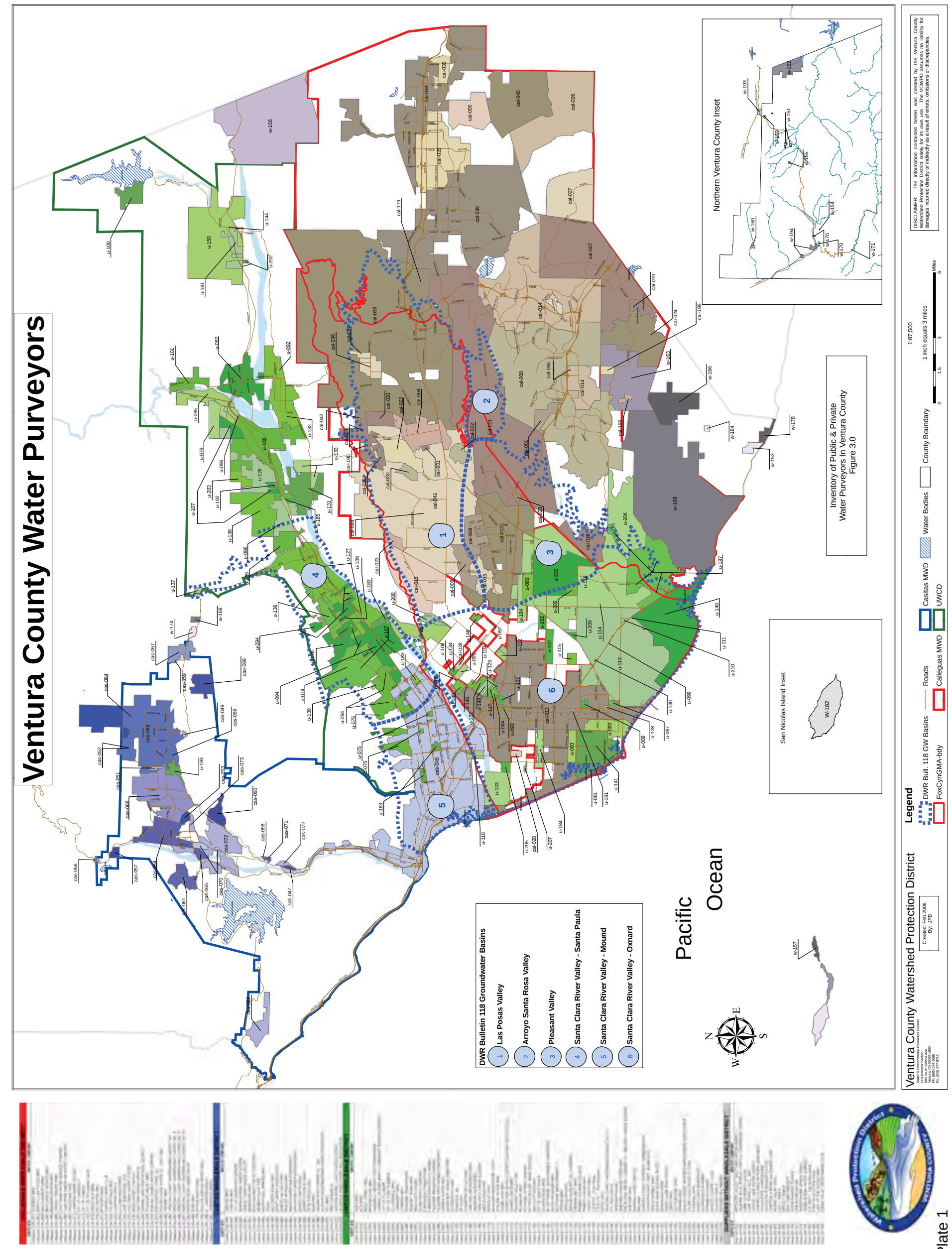


Figure 1. Location map of Fox Canyon Groundwater Management Agency boundary.

The Annotated California Codes Water Appendix, Chapter 121-102 et seq. required the FCGMA to develop, adopt, and implement a plan to control groundwater extractions from the Upper Aquifer System (UAS) to achieve a balanced water supply and demand in the Upper Aquifer System by the year 2000. Additionally, the Water Code required the FCGMA to adopt a Lower Aquifer System (LAS) Management Plan for future extractions from the Lower Aquifer System, including a policy for issuing well permits and a Contingency Plan for seawater intrusion into the Lower Aquifer System. The FCGMA adopted its original Groundwater Management Plan in 1985. The original FCGMA Groundwater Management Plan specified several major items or tasks for accomplishment.



At the time of the initial Management Plan development in 1984-1985, the primary threat to the aquifers of western Ventura County was seawater intrusion in the Upper Aquifer System. Since that time, a number of studies have identified other water quality problems, including saline intrusion in the Lower Aquifer System (LAS) in the Pleasant Valley basin, and in the Las Posas basin. This update to the groundwater management plan is designed to look at a broader range of problems and to suggest potential solutions to these problems.

Since 1985, there have been a number of studies conducted within the FCGMA, the most comprehensive being the Regional Aquifer System Analysis (or RASA Study) done by the U.S. Geological Survey (USGS) in the late 1980s and 1990s. This study, conducted with the cooperation of local agencies, consisted of drilling monitoring wells with individual casings perforated in selected aquifers or water-bearing zones, constructing a groundwater model, and conducting hydrogeologic studies. Monitoring wells, most constructed along the coastline of the Oxnard Plain, continued to provide critical information on the status of saline intrusion. In addition, a number of more specific or follow-up studies have been conducted by the United Water Conservation District (UWCD) and other agencies. These studies have helped characterized seawater intrusion along the coastline, saline contamination in more inland areas, and nitrate contamination in the Upper Aquifer System. The USGS MODFLOW groundwater model has been used and refined by the groundwater staff at UWCD to test a variety of projects that could help mitigate the water quality problems within the FCGMA.

This 2007 Update to the FCGMA Groundwater Management Plan incorporates all previous work and the specific studies that were undertaken as part of this most-recent planning process. The Plan is organized with the results of past and current studies followed by an evaluation of both current management strategies and potential future management strategies for the FCGMA. Various groundwater management ideas and strategies have been evaluated first by FCGMA staff, and UWCD staff, and then reviewed by Calleguas Municipal Water District (CMWD) management and staff and consultants from the water purveyors within the FCGMA. Extensive public review by stakeholders was also a critical part of the planning process.

Appendix C includes a document entitled, the East Los Posas Basin Management Plan (ELPBMP). The ELPBMP was developed through ongoing discussions between CMWD and the Las Posas Basin Users Group (farm well owners, mutual water companies, and the Ventura County Water Works Districts that supply water to the City of Moorpark and others). The ELPBMP serves as a more detailed sub-basin management planning document grounded in the FCGMA February 23, 1994 approval of CMWD's Application for Injection/Storage Facilities in the North Los Posas Groundwater Basin. (Appendix C - Exhibit A). As such, the ELPBMP particularly addresses the interaction of CMWD's Aquifer Storage and Recovery (ASR) project with other basin pumpers regarding both basin-wide and local effects of the project.

2.0 BACKGROUND OF GROUNDWATER MANAGEMENT AND OVERDRAFT WITHIN THE FCGMA

Although high chloride levels were first documented near Port Hueneme in the 1930s (California Department of Water Resources [DWR], 1954), the conditions for widespread seawater intrusion on the Oxnard Plain were initiated as early as the 1940s, when groundwater levels beneath the southern portion of the Oxnard Plain basin dropped below sea level (see Appendix A). Within 5 to 10 years, chloride concentrations in wells in the Port Hueneme area started to increase rapidly. At that time, seawater had only affected a few wells in the Port Hueneme area, encompassing an area less than one square mile (Appendix A).

Within 20 years, seawater intrusion in the Port Hueneme area had extended as much as 3 miles inland. In some of the affected wells, chloride concentrations were as high as those of seawater (just less than 20,000 mg/L). Appendix A documents the progression of seawater intrusion beneath the southern portion of the Oxnard Plain basin. This seawater intrusion into the Upper Aquifer System was located adjacent to the Hueneme Submarine Canyon that is directly offshore of Port Hueneme (Figure 2). Seawater intrusion also occurred in the Point Mugu area, adjacent to the Mugu Submarine Canyon that extends offshore from Mugu Lagoon. This intrusion in the Point Mugu area first impacted Upper Aquifer System wells in late 1950s (Appendix A).

In the Port Hueneme area, seawater in the Upper Aquifer System reached its farthest point inland in the early 1980s (Appendix A). Following the high rainfall year of 1983, chloride levels began to decrease in many of the Port Hueneme area wells perforated in the UAS. Coupled with pumping allocations and management strategies imposed by the FCGMA, this improving trend in chloride reductions was accelerated in the 1990s, as the Freeman Diversion was completed by UWCD and several wet years occurred, which allowed increased recharge available from the diversion, helping restore aquifer pressures and pushing seawater back toward the coast.

Groundwater levels in the Lower Aquifer System also dropped below sea level in the late 1950s. This Lower Aquifer System intrusion was first detected in wells in the late 1980s (Appendix A). As with the Upper Aquifer System, the intrusion in the Lower Aquifer System spread into the aquifer both near Port Hueneme and at Point Mugu. Further exacerbating the drops in groundwater levels in the LAS was an increase in production in the Lower System – partly in search of better quality water supplies and partly because new or replacement wells were required to be drilled in the LAS as a strategy to lessen pumping in the intruded Upper Aquifer System.

The overpumping of the aquifers that led to seawater intrusion also created land subsidence of up to 2.2 feet in the Pleasant Valley area north and northwest of Mugu Lagoon by the early 1970s as dewatered clay layers between aquifer zones collapsed from reduced hydrostatic pressures. This subsidence is permanent – refilling of the sand and gravel aquifers cannot force water back into the dewatered clay layers.

In the Point Mugu area (Figure 2), chlorides have not lessened over the past two decades. Instead, chloride concentrations continued to increase in the area of Mugu Lagoon, reaching concentrations almost as high as seawater in some wells. The CM1A monitoring well in that area showed an increase in chloride concentrations from several hundred mg/L to 4,600 mg/L in a little more than one decade.

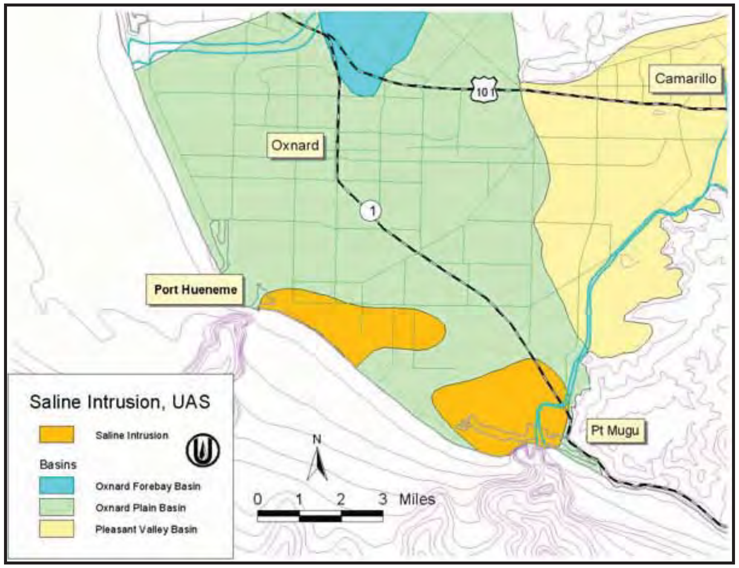


Figure 2. Areas of saline intrusion beneath the Oxnard Plain basin in 2006. The sources of the saline intrusion are discussed in section 5.1.1 *Seawater Intrusion*.

As the USGS began their work in Ventura County in late 1980s, they proposed that the increase in chlorides in the UAS and LAS was caused not just from seawater intrusion but also from the intrusion of saline waters being pulled from surrounding sediments and from deeper depths along fault zones (Izbicki, 1991, 1992; discussed in more detail in section 5.1.1 *Seawater Intrusion*). The cause of this additional saline contamination was the same as for seawater intrusion, that is, very low groundwater levels. This additional saline contamination of groundwater inland from the lobes of seawater intrusion was caused by excessive groundwater pumping and lowered groundwater levels. This finding raised the possibility that saline contamination could occur in inland areas wherever groundwater levels are particularly depressed.

There was some initial concern chloride concentrations measured in some of the producing wells were simply detecting high chloride waters flowing downward from failed well casings. To ensure monitoring results were accurately depicting saline intrusion, a series of monitoring wells were drilled along the coastal portions of the Oxnard Plain. These multiple-completion wells consist of a single well bore containing several smaller-diameter PVC wells completed at varying aquifer depths. These monitoring wells give discrete depth-dependent data from the aquifers and form the basis of much of the current monitoring program.

Several trends in saline intrusion are evident on the south Oxnard Plain. The Port Hueneme lobe of seawater intrusion has decreased considerably in size and chloride concentration in the

Upper Aquifer System. However, Lower Aquifer System chloride concentrations have somewhat increased in this Port Hueneme lobe. In the more southeastern Point Mugu lobe, concentrations of chloride are generally higher than in the past both in the UAS and LAS; the areal extent of the intrusion of seawater is not known with precision. The area affected by saline intrusion from surrounding sediments has increased both in size and in chloride concentration. This increase in size has prompted United Water Conservation District to drill new monitoring wells inboard of this saline intrusion to detect further movement of salts.

Local and State Actions – The increasing seawater intrusion prompted the State Water Resources Control Board to consider adjudication in the early 1980s, with the result that local agencies, working with the State Board, created a series of physical solutions and institutions to tackle the problem. The physical solutions included adding artificial recharge capability for the aquifers and providing additional in-lieu surface water to groundwater pumpers. The institutional solution was the formation of the Fox Canyon Groundwater Management Agency to bring water usage into balance with recharge sources to prevent overdraft conditions.

Formation of the Fox Canyon Groundwater Management Agency – In 1982, State Senate Bill 2995 was approved creating the Fox Canyon Groundwater Management Agency (FCGMA). The agency's activities were defined as "planning, managing, controlling, preserving, and regulating the extraction and use of groundwater within the territory of the agency." That directive also went on to say, "shall not involve itself in activities normally and historically undertaken by its member agencies, such as the construction and operation of dams, spreading grounds, pipelines, flood control facilities, and water distribution facilities, or the wholesale and retail sale of water." This prohibition of water conservation and distribution facilities along with water sales by the FCGMA was clearly meant to delineate the separate powers of the various agencies within the County (see following section).

The FCGMA officially began operations on January 1, 1983 with the County of Ventura contracting to provide staffing and related services to the new agency. In May 1983, Ordinance No. 1 was adopted requiring all wells within the agency to register and begin reporting groundwater extractions. This ordinance also set extraction management fees (at $0.50/AF), becoming the sole source of income to the fledgling agency sans any minor penalty or surcharge fees that would be instituted in later ordinance revisions. Ordinance No. 2 (October 1983) was a short amendment to Ordinance No. 1 establishing semi-annual groundwater extraction reporting to cover the first and second half of each calendar year, with statements due within 30 days following each period.

A groundwater management plan was adopted in 1985 to set goals and to help guide FCGMA policies. In February 1987, Ordinance No. 3 was adopted to require flow meters on all but domestic wells. Ordinance No. 4 (July 1987) soon followed that protected the aquifer outcrop areas in the East and West Las Posas basin (formerly collectively referred to as the North Las Posas basin) and regulated groundwater extractions in the basin via more detailed rules than those in any previous ordinance. The adoption of Ordinance No. 5 in August 1990 completed the first steps for the FCGMA by setting up a system of scheduled extraction reductions, allowing for the use of Historical, Baseline, and Agricultural Efficiency Allocations, and establishing a credit system to encourage cutbacks in pumping, along with a penalty system for overpumping beyond the established annual allocation.

Agencies' responsibilities - Several agencies are responsible for managing water resources in Ventura County. The FCGMA has responsibility for groundwater management planning, managing pumping allocations and credits, and developing policies related to groundwater extractions and recharge. United Water Conservation District (UWCD) has responsibility for managing groundwater resources in seven basins in the county, including most of the basins within the Fox Canyon Groundwater Management Agency (FCGMA) (Plate 1). UWCD's responsibilities include groundwater and surface water monitoring, constructing and maintaining water conservation and recharge facilities, reporting on groundwater conditions, and groundwater management and planning activities. Groundwater management and planning functions overlap between the FCGMA, UWCD, and other local agencies, with the FCGMA focusing on extractions and policy and UWCD focusing on planning and implementing projects. Calleguas Municipal Water District (CMWD) is responsible for providing State Water to portions of Ventura County and providing water management strategies to ensure a reliable source of water for its customers (Plate 1). The Ventura County Watershed Protection District (VCWPD) is responsible for flood control functions, groundwater/surface water monitoring, and water well permitting. The water purveyors (cities and water districts) decide how much and from where their groundwater supplies are extracted, as well as plan projects that benefit the aquifers. There has been a remarkable amount of cooperation among these organizations in addressing groundwater issues over the last 20+ years.

In practice, groundwater management functions within the boundaries of the FCGMA are performed in the following ways:

1. Groundwater levels and groundwater quality sampling and analysis are conducted by UWCD, VCWPD, and individual water purveyors;
2. Groundwater extraction records are collected by both the FCGMA and UWCD, with the FCGMA maintaining records on extraction allocations and credits;
3. An annual report on groundwater conditions is prepared by UWCD within UWCD boundaries and CMWD prepares reports on groundwater conditions within the West, East, and South Las Posas basins (in conjunction with the Las Posas Basin Users Group;
4. Water purveyors prepare regular plans on current and future water use and supplies (e.g., Urban Water Management Plans);
5. The FCGMA prepares this Groundwater Management Plan to evaluate basin management objectives, strategies, and policies;
6. UWCD and some of the water purveyors construct and operate water conservation facilities; and
7. The VCWPD (and the City of Oxnard within its boundaries) oversees all well drilling, well destruction, and monitoring well requirements and permitting.

The initial Groundwater Management Plan (September 1985) prepared by the FCGMA recommended groundwater pumping be reduced by 25% over a 20-year period to help bring the aquifers into balance or to reach safe yield by year 2010 and to mitigate seawater intrusion by that same target date. This plan was based on groundwater demand projections for the period between 1980 and 2010. Subsequent Board ordinances (Ordinance No. 5) formulated an extraction allocation for all groundwater pumpers within the FCGMA, based on average extractions during the years 1985 to 1989. Starting in 1990, these pumping or "Historical" allocations were to be reduced by 5% every five years, with a planned 25% total reduction by the year 2010.

A program of "Conservation" and "Storage" credits allows well operators to vary their annual pumping in accordance with crop changes and/or annual hydrologic conditions. In addition, agricultural pumpers are allowed the option of using Irrigation Efficiency instead of the allocation/credit program. Agricultural efficiency for individual pumpers (later deemed as

"operators" of one or more wells) is required to be at least 80% or better (20% or less going to leaching, deep percolation, or runoff), when compared to FCGMA allowed water for particular crop water demand based on daily evapotranspiration and precipitation measurements from a series of weather stations installed throughout the FCGMA. A surcharge fee, based on the extraction reporting, was formulated to penalize individual pumping above allowed annual allocations or not meeting the required irrigation efficiency percentage minimum. These penalties have been seldom used since their inception, largely because of widespread cooperation among pumpers to reduce groundwater extractions.

In cooperation with the Watershed Protection District, the FCGMA also helped formulate requirements that new wells be completed in specific aquifers to help control seawater intrusion. A similar cooperative program that utilized Federal 319(h) grant funds coupled with matching local funds helped destroy a number of abandoned wells across the Oxnard Plain which, had the potential to act as conduits allowing inter-aquifer mixing. A total of 49 old abandoned or leaking wells were destroyed under this program.

3.0 GROUNDWATER BASINS & HYDROGEOLOGY

The basins within the FCGMA are part of the Transverse Ranges geologic province, in which the mountain ranges and basins are oriented in an east-west rather than the typical northeast-southwest trend in much of California and the western United States. Active thrust faults border the basins of the Santa Clara River, causing rapid uplift of the adjacent mountains and downdropping of the basins. The alluvial basins are filled with substantial amounts of Tertiary and Quaternary sediments deposited in both marine and terrestrial (non-marine) settings. The basins beneath the Oxnard Plain are filled with sediments deposited on a wide delta complex formed at the terminus of the Santa Clara River and was heavily influenced by alternating episodes of advancing or retreating shallow seas that varied with world-wide sea level changes over many millions of years.

There are seven main or significant groundwater basins within the FCGMA (Figure 3). These groundwater basins have been called by somewhat different names historically; this Plan uses the terminology of the U.S. Geological Survey from their work in the 1990s and early 2000s (e.g., Hanson et al., 2003) because it is the most recent comprehensive study of the basins. These groundwater basins include the Oxnard Plain, the Oxnard Plain Forebay, the Pleasant Valley, the Santa Rosa, and the East, West and South Las Posas basins. These basins generally contain two major aquifer systems, the Upper Aquifer System (UAS) and the Lower Aquifer System (LAS). Separate aquifers locally named within these systems include the Oxnard and Mugu aquifers (UAS) and the Hueneme, Fox Canyon, and Grimes Canyon aquifers (LAS). A shallower, unconfined aquifer is also present locally underlying rivers and creeks. Underlying the Oxnard Plain and Pleasant Valley basins are sand layers of the "semi-perched zone," which may locally contain poor-quality water. This zone extends from the surface to no more than 100 ft in depth. These sands overlie confining clay of the upper Oxnard Aquifer which generally protects the underlying aquifers from contamination from surface land uses. The Semi-perched zone is rarely used for water supply.

The aquifers are comprised of sand and gravel deposited along the ancestral Santa Clara River, within alluvial fans along the flanks of the mountains, or in a coastal plain/delta complex at the terminus of the Santa Clara River and Calleguas Creek. The aquifers are recharged by infiltration of streamflow (primarily the Santa Clara River), artificial recharge of diverted streamflow, mountain-front recharge along the exterior boundary of the basins, direct infiltration of precipitation on the valley floors of the basins and on bedrock outcrops in adjacent mountain fronts, return flow from agricultural and household irrigation in some areas, and in varying degrees by groundwater underflow from adjacent basins.

LOWER AQUIFER SYSTEM – The Lower Aquifer System (LAS) consists of the Grimes Canyon, Fox Canyon, and Hueneme aquifers (e.g., Figure 6) from the deepest to the shallowest. The LAS is part of the Santa Barbara, San Pedro, and Saugus formations of Plio-Pleistocene age (Hanson et al, 2003). The lowest water-bearing unit of the East Las Posas and Pleasant Valley basins is commonly referred to as the Grimes Canyon aquifer (California Department of Water Resources, 1954; Turner, 1975). The Fox Canyon aquifer underlies all of the groundwater basins beneath the FCGMA, but is most significant in the East and West Las Posas, Pleasant Valley, Oxnard Plain Forebay, and Oxnard Plain basins. The Hueneme aquifer is considered to underlie most coastal areas of the southern Oxnard Plain (Hanson et al, 2003), and is an important source of water in the Oxnard Plain, Pleasant Valley, and the West Las Posas basins.

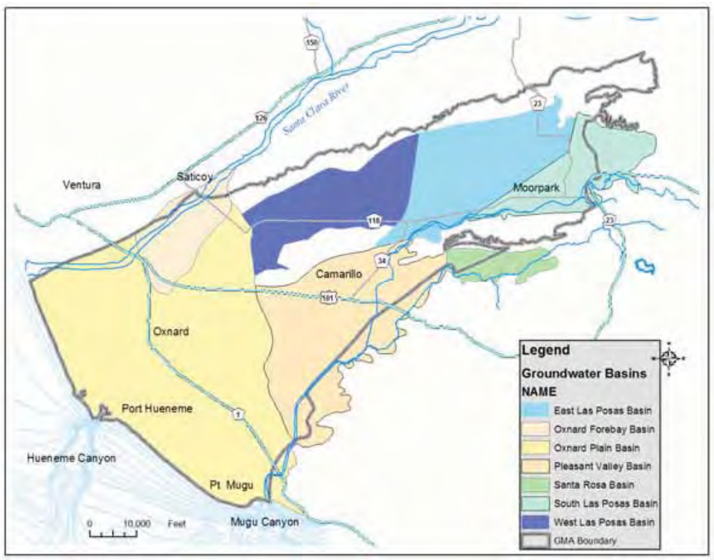


Figure 3. Groundwater basins within the Fox Canyon Groundwater Management Agency.

The aquifers within the LAS are commonly isolated from each other vertically by low-permeability units (silts and clays) and horizontally by regional fault systems. There is active tectonism (faulting and folding) within the area of the FCGMA, caused by compressional and lateral forces as the Transverse Ranges are caught in a vise between the Pacific and North American tectonic plates. As a result, the LAS is folded and tilted in many areas, and has been eroded along an unconformity separating the Upper and Lower aquifer systems.

UPPER AQUIFER SYSTEM – The Upper Aquifer System (UAS) within the FCGMA consists of the Mugu and Oxnard aquifers (Figure 5, Figure 6), from deepest to most shallow, of Late Pleistocene and Holocene age. The UAS rests unconformably on the Lower Aquifer System, with basal conglomerates in many areas (Hanson et al, 2003). In the Oxnard Plain, these coarse-grained basal deposits have been referred to as the Mugu aquifer (Turner, 1975). The Mugu aquifer is generally penetrated at a depth of 255 ft to 425 ft below land surface. The younger Oxnard aquifer is present throughout the Oxnard Plain. The Oxnard aquifer is the primary aquifer used for groundwater supply on the Oxnard Plain. This highly-permeable assemblage of sand and gravel is generally found at a depth of approximately 100 ft to 220 ft below land surface elevation.

OXNARD PLAIN FOREBAY AND OXNARD PLAIN BASINS – Both Upper and Lower aquifers are present in the Oxnard Plain Forebay and Oxnard Plain basins (Figure 4). The Oxnard Plain basin extends several miles offshore beneath the marine shelf, where outer edges of the aquifer are in direct contact with seawater. In areas near Port Hueneme and Point Mugu where submarine canyons extend nearly to the coastline (Figure 2, Figure 7), the fresh-water aquifers are in direct contact with seawater only a short distance offshore.

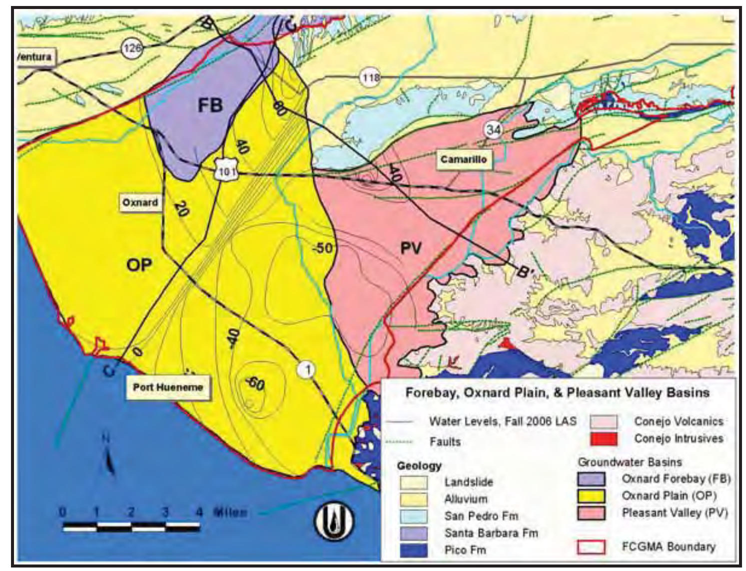


Figure 4. Map of Oxnard Forebay, Oxnard Plain, and Pleasant Valley basins. Contours of Lower Aquifer groundwater elevations in the Fall of 2006 indicate that the south Oxnard Plain and Pleasant Valley basins have significant areas below sea level. The locations of geologic sections B-B' (Figure 5) and C-C' (Figure 6) are indicated on map.

The Oxnard Plain Forebay basin is the main source of recharge to aquifers beneath the Oxnard Plain. The absence of low-permeability confining layers (no continuous clay or silt layers) between surface recharge sources and the underlying aquifers (sand and gravel layers) in the Forebay basin allows for effective recharge of the basin and subsequent recharge of aquifers further to the south and southwest (e.g., Figure 6). Recharge to the Forebay basin comes from a combination of percolation of Santa Clara River flows, artificial recharge from United's spreading grounds at Saticoy and El Rio, agricultural and household irrigation return flows, percolation of rainfall, and lesser amounts of underflow from adjacent basins. In the area of the Forebay between the El Rio and Saticoy spreading grounds, the Lower Aquifer System has been folded and uplifted and then truncated (eroded away) along its contact with the Upper Aquifer System (Figure 5, Figure 6). In this area, recharge from surface sources may enter both the Upper Aquifer System and the underlying Lower Aquifer System. It is estimated that about 20% of the water recharged to this area reaches the Lower Aquifer System, with the remainder recharging the Upper Aquifer System (Hanson, 1998).

The Oxnard Plain Forebay basin accepts large quantities of recharge water in a single year, and the basin was filled to near-capacity during several recent wet years (UWCD, 2003). High groundwater elevations in the Oxnard Plain Forebay basin increase the hydraulic head (pressure) in the confined aquifers of the Oxnard Plain, raising water levels throughout the Plain and promoting natural offshore flow in coastal areas.

The Oxnard Plain Forebay basin is hydrologically connected with the aquifers of the Oxnard Plain basin (e.g., Figure 6). Thus, the primary recharge to the Oxnard Plain basin is from underflow from the Forebay rather than the deep percolation of water from surface sources on the Plain. When groundwater levels are below sea level along the coastline, there may also be significant recharge by seawater flowing into the aquifers (from the historic discharge areas shown in Figure 7 where the aquifers are exposed on the sea floor). When Lower Aquifer System (LAS) water levels are substantially lower than Upper Aquifer System (UAS) water levels (creating a downward gradient), there may be substantial leakage of UAS water into the LAS both through discontinuities within the silts and clays between aquifers on the Oxnard Plain and as slow vertical percolation directly through the silt and clay material itself. Some amount of downward percolation can also occur via wells that are perforated in both aquifer systems and via compromised (failed or leaking) well casings.

One of the more recent findings associated with groundwater beneath the Oxnard Plain basin is a zone with a steeply-dipping groundwater gradient in the Lower Aquifer System that extends across the Oxnard Plain from just south of Port Hueneme northeastward to the south flank of the Camarillo Hills (Figure 4, just south of section C-C'). This steep gradient is apparently caused by a lower-conductance zone that bisects the Oxnard Plain at the depth of the Lower Aquifer System (e.g., UWCD, 2003). This zone, likely a fault or other structural feature, reduces recharge flowing from the Oxnard Plain Forebay basin to the south Oxnard Plain and Pleasant Valley. This zone may be an extension of the Simi-Santa Rosa fault that extends along the southern flank of the Camarillo Hills. The presence of this subsurface feature that reduces groundwater flow also limits the effectiveness of management strategies that rely on groundwater flowing in the LAS from recharge areas in the Oxnard Plain Forebay basin to the south Oxnard Plain and to Pleasant Valley. This Management Plan proposes specific strategies to overcome this geologic hurdle to recharging the LAS in these southern areas of the FCGMA.

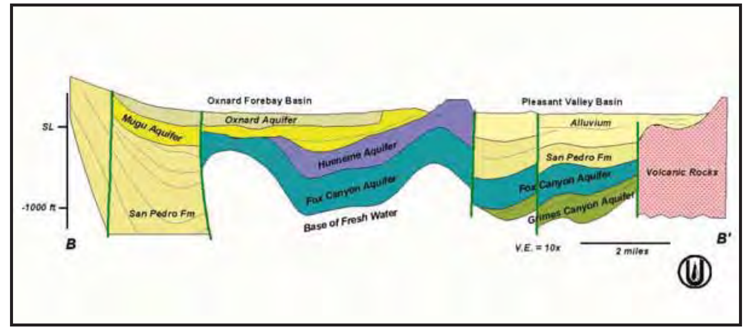


Figure 5. Geologic section B-B'. Simplified from Mukae and Turner (1975). Note ten times vertical exaggeration to accentuate stratigraphic units.

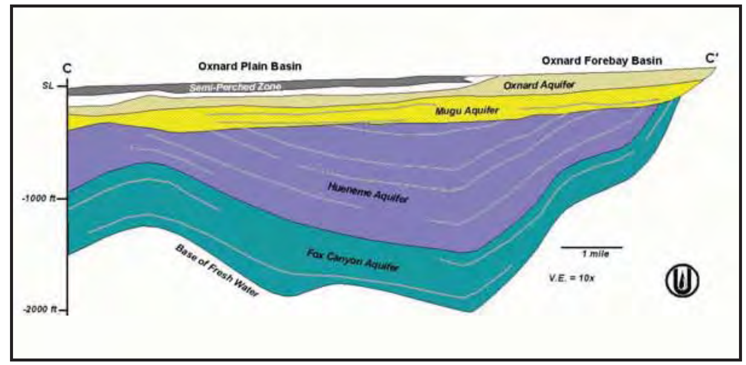


Figure 6. Geologic section C-C'. Simplified from Mukae and Turner (1975). Note ten times vertical exaggeration to accentuate stratigraphic units.

PLEASANT VALLEY BASIN – The Pleasant Valley groundwater basin (Figure 4) has been historically differentiated from the Oxnard Plain basin by a general lack of Upper Aquifer System aquifers (Turner, 1975). However, there may be local water-producing Upper Aquifer System units within the Pleasant Valley basin (Turner, 1975; Hanson et al, 2003). The Pleasant Valley basin is confined by thick fine-grained deposits overlying the aquifers of the basin. The Fox Canyon aquifer is the major water-bearing unit in the basin. Despite the fault barrier to the west, the Lower Aquifer System is in hydrologic continuity with the adjacent southern portion of the Oxnard Plain basin.

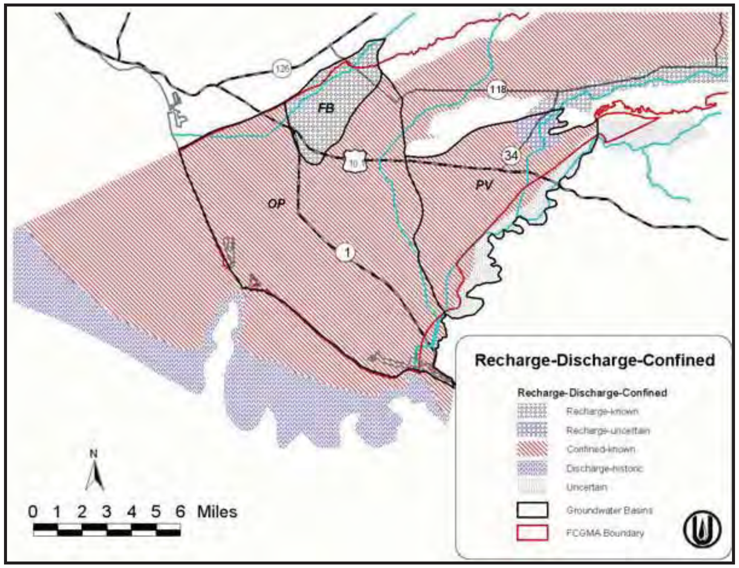


Figure 7. Recharge and discharge areas of coastal aquifers, with confined portions of the aquifers indicated. The offshore discharge area is the location where the aquifers are exposed on the ocean bottom and in submarine canyons. See text for discussion. Basin designations: OP-Oxnard Plain, FB-Oxnard Forebay, PV-Pleasant Valley.

Historically it was assumed that the LAS of the Pleasant Valley Basin was relatively confined and received little overall recharge across the fault that extends from the Camarillo Hills to Port Hueneme. However, since the early 1990s, water levels have begun to rise in the northern adjacent basins. The City of Camarillo has two existing wells in the northeast portion of the Pleasant Valley Basin (hereafter called the Somis Area) and these wells confirm that rising water levels in northern adjacent basins directly impact recharge rates, water quality, and water levels in the Somis Area. The recharge in the Somis Area may be a result of uplift and folding of Lower Aquifer units that allow rapid stream flow percolation. This area is indicated as "Recharge-uncertain" at the north end of the Pleasant Valley basin on Figure 7 to reflect the uncertainty of the extent of this area of recharge. It is recommended that additional monitoring and studies be conducted to determine the dimensions and nature of this apparent recharge area.

The groundwater hydrology of the portion of the Pleasant Valley basin east of the city of Camarillo is not well understood because there are not many wells drilled in the area. Along Calleguas Creek near California State University Channel Islands, water has been produced historically from aquifer depths that are shallower than the typical LAS well, suggesting that water-bearing strata are not limited to the LAS in this area.

It is clear that the eastern and northeastern portions of the Pleasant Valley basin need to be better understood (indicated as "Unknown" along the eastern edge of the Pleasant Valley basin on Figure 7). Past studies have considered the basin as largely confined, with perhaps some perched water along a portion of its eastern edge. The conceptual hydrogeology that was the basis for the Ventura Regional Groundwater Model used the conclusions from these studies. As suggested above, additional monitoring and studies are needed to better determine the hydrogeology of the area, with these results integrated into the groundwater model.

SANTA ROSA BASIN – The Santa Rosa basin (Figure 8) is the smallest basin within the FCGMA. Groundwater levels are heavily influenced by flows in the overlying Conejo Creek; discharges from a wastewater treatment plant and dewatering wells in Thousand Oaks have considerably increased year-round flows in the creek. Aquifers in the basin include a shallow alluvium aquifer and portions of the Lower Aquifer System. The structure of this basin is dominated by the east-trending Santa Rosa syncline that folds the San Pedro and Santa Barbara Formations (CSWRB, 1956). This syncline helps direct groundwater flow in the San Pedro Formation. The Santa Rosa fault zone forms a barrier to groundwater flow into the basin from the north. A sharp change in water level in the western part of the basin may be caused by a roughly north-trending fault that restricts groundwater flow (CDWR, 2003). Elevated nitrate and sulfate have been a problem in the basin.

LAS POSAS BASIN –The Las Posas groundwater basin (Figure 8) is bounded on the south by the Camarillo and Las Posas Hills and on the north by South Mountain and Oak Ridge (CSWRB, 1954). The basin has been variously subdivided into North and South basins (e.g., Turner and Mukae, 1975) or by West, East, and South basins (e.g., Hanson, 1998). The U.S. Geological Survey terminology (Hanson, 1998) is used in this Management Plan. Productive aquifers in this basin include a shallow unconfined aquifer that is most transmissive along the Arroyo Las Posas and a lower confined aquifer system that is considered to be the equivalent of the Lower Aquifer System on the Oxnard Plain (Figure 9).

South Las Posas Basin – This basin is separated from the East Las Posas basin by an east-trending anticline (fold) that affects all but the shallowest alluvium (Figure 9). This fold may affect groundwater flow between the East and South Las Posas basins at some aquifer depths, although recharge from the South Las Posas basin flows readily into the East Las Posas basin at Lower Aquifer System (LAS) depths. To the south, the Springville and Santa Rosa fault zones produce disrupted and tightly folded rocks along the edge of the basin, restricting groundwater flow to the south (CSWRB, 1956). There is a shallow alluvial aquifer that follows the trend of Arroyo Las Posas as it crosses the South Las Posas basin; this shallow aquifer is in hydrologic connection with the underlying LAS and is the main source of recharge to the LAS (indicated as the recharge area along the south edge of the East and South Las Posas basins on Figure 10).

There has been a significant change in average groundwater levels over the past 40 years in the South Las Posas basin, with groundwater levels rising more than 100 ft during this period. The mechanism for this rise in groundwater elevations is the increased recharge from percolation beneath the Arroyo Las Posas as discharges from the Moorpark and Simi Valley wastewater treatment plants and dewatering wells in Simi Valley have increase year-round flow in the arroyo. The entire alluvial aquifer near the arroyo has progressively filled to the elevation of the arroyo, starting in the easternmost portion of the basin in the 1960s and moving westward through the 1990s (Bachman, 2002). Water from the filled alluvial aquifer has percolated downward into the underlying Lower Aquifer System, creating a recharge mound in the Lower

Aquifer System that extends from the arroyo northward into the East Las Posas basin (CH2MHill, 1993; Bachman, 1999).

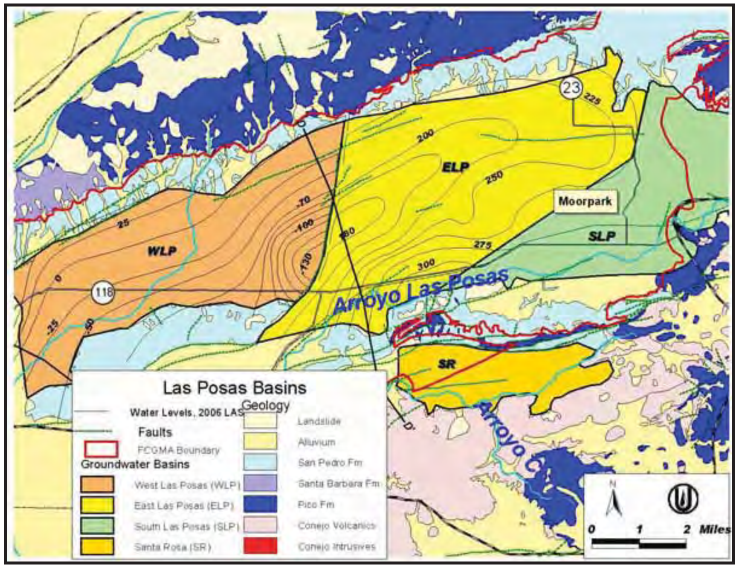


Figure 8. Map of Las Posas and Santa Rosa basins. Contours of Lower Aquifer groundwater elevations in 2006 indicate the recharge mound along Arroyo Las Posas and the change in groundwater elevations across the fault that forms the boundary between the West and East Las Posas basins. The location of geologic section D-D' (Figure 9) is indicated on the map.

Salts (i.e., chloride, sulfate) in the groundwater have increased in the South Las Posas basin and the southwestern portion of the East Las Posas basin as the shallow aquifer filled along Arroyo Las Posas. These salts apparently were leached from the shallow aquifer as groundwater levels reached record highs, saturating sediments that have been unsaturated for the historic period. These salts apparently migrated vertically with percolating groundwater into the LAS and then laterally into the main portion of the East Las Posas basin as the recharge mound developed. Some of this groundwater is unsuitable for irrigation without being blended with better-quality water.

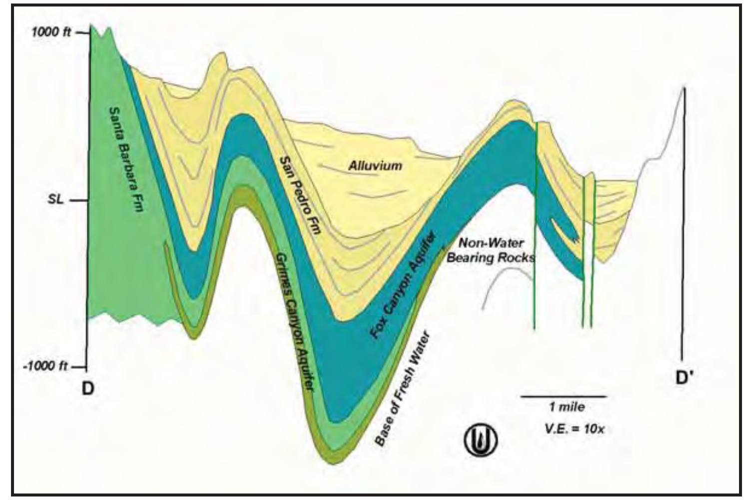


Figure 9. Geologic section D-D'. Simplified from Mukae and Turner (1975). Note ten times vertical exaggeration to accentuate stratigraphic units.

East Las Posas Basin – The East Las Posas basin is separated from the West Las Posas basin by a north-trending unnamed fault running through Somis (CH2MHill, 1993; Hanson, 1998), across which groundwater levels differ by as much as 400 feet (Figure 8). The fault also acts as a barrier to transport of saline waters from the East Las Posas basin to the West Las Posas basin (Bachman, 1999).

The source of recharge to the East Las Posas basin has changed significantly since urban development of the Simi Valley and Moorpark areas over the last 30 years. Prior to this time, recharge was predominantly from rainfall on outcrop areas and from percolation of winter floodwater along the Arroyo Las Posas. Geochemical studies show that groundwater in the central portion of the East Las Posas basin is hundreds to thousands of years old (Izbicki, 1996b), indicating a slow rate of historical recharge along the flanks of the basin. As discussed for the South Las Posas basin, urban development has brought increased discharges of both treated wastewater and shallow groundwater into Arroyo Las Posas, providing a year-round recharge source for the South and East Las Posas basins (CH2MHill, 1993; Bachman, 2002). This increased percolation from the arroyo has created a recharge mound that extends northward into the East Las Posas basin, where groundwater levels have risen by 125 ft to 200 ft during the past 30 years.

Conversely, pumping in the basin has resulted in falling groundwater levels in the eastern portion of the basin, away from the recharge mound. The largest drop in groundwater levels (190 ft) over the period 1973 to 1998 occurred in this region (Bachman, 1999). Groundwater levels have stabilized somewhat across the basin since the late 1990s, at least in part because of the addition of in-lieu and injected recharge by CMWD as part of the Las Posas Basin Aquifer Storage and Recovery (ASR) project.

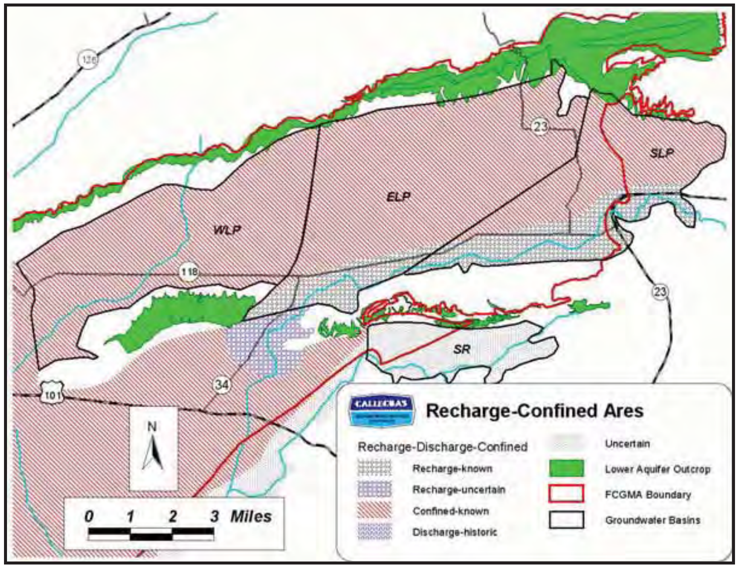


Figure 10. Recharge and discharge areas of Las Posas and Santa Rosa basins, with confined portions of the aquifers indicated. See text for discussion. Basin designations: WLP-West Las Posas, ELP-East Las Posas, SLP-South Las Posas, SR-Santa Rosa.

West Las Posas Basin – The West Las Posas basin (Figure 8) is isolated from the recharge sources of the East and South Las Posas basins by the north-south fault discussed in the previous paragraphs. Instead, the West Las Posas basin is hydrologically connected to the Oxnard Plain basin, with groundwater levels in the western portion of the basin rising and falling with wet and dry climatic cycles of recharge. Groundwater elevation contours are interpreted to extend continuously in the LAS from the Oxnard Plain basin into the West Las Posas basin, suggesting that there is no hydrologic boundary at the western end of the basin. Instead, the western boundary of the basin is defined by surface features – the end of the Las Posas Valley and the beginning of the flat terrain of the Oxnard Plain.

In the eastern portion of the basin, just to the west of the north-trending fault at Somis, a groundwater level trough that was 35 ft below sea level in 1973 had dropped to 150 ft below sea level by 1998 (the trough has since stabilized, with a slight rise in groundwater levels during the last several years). Groundwater elevations slope from their highest point at the western end of the basin to their lowest point at the eastern end of the basin, indicating that recharge water flows from the Oxnard Plain eastward into the basin. There is a flow component from the northern flank of the basin, suggesting that there is also significant mountain-front recharge.

4.0 GROUNDWATER EXTRACTIONS

The FCGMA has collected records of extraction for wells within the Agency for semi-annual periods since 1985. These extraction records are entered into a computer database, and individual wells that reported any pumping between 1985 and 1989 (known as the FCGMA "Base Period") have been assigned Historical Allocations based on those extractions. These extraction records are also used to calculate Conservation Credits and to determine pumping trends within the FCGMA.

Extractions vary from year to year (Figure 11) based largely on the amount (Figure 12) and patterns of rainfall for agricultural uses and the ratio of groundwater to imported water ordered by M&I providers in any year. This year-to-year variation makes it difficult to compare pumping from one year to the next without factoring in these climate and policy variations. However, now that there are historic records available that were gathered over at least a 20-year period, similar climatic years can be compared to determine general trends in pumping. For instance, a comparison of the dry years 1987 and 2002 (the two driest years during the 20-year period, Figure 12) indicates that overall reported pumping declined by about 37,000 acre-feet per year (164,700 to 127,700 AFY) within the Agency. Likewise, comparing average precipitation years 1988 and 2000 (Figure 12) indicates that reported pumping was reduced by 36,800 acre-feet per year (160,500 to 123,700 AFY).

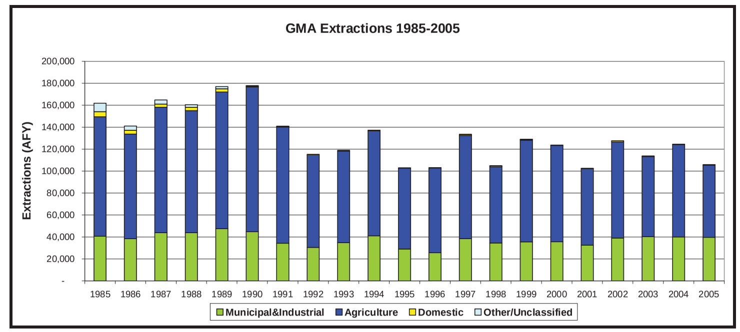


Figure 11. Reported extractions within the FCGMA for years 1985 to 2005.

This apparent decreasing trend in FCGMA pumping occurred in different fashions for agriculture and M&I. Agricultural pumping decreased earliest, following the end of the 1986-1991 drought. This decrease in agricultural pumping has also been documented by UWCD (2002) in a study of agricultural efficiencies within the FCGMA. The increased irrigation efficiency is likely the result of improved irrigation systems such as drip tape and micro sprinklers that were installed within that time frame. A portion of the decrease in agricultural pumping can also be attributed to land conversion to urban uses (see discussion below) and increased yields from the Freeman Diversion and the Conejo Creek project that supplied growers an alternative water source to pumped groundwater.

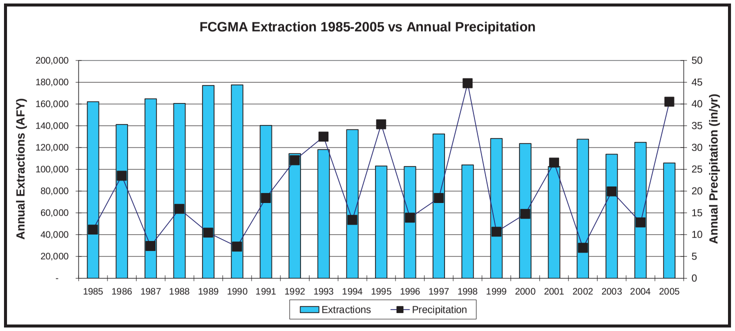


Figure 12. FCGMA extractions plotted against annual precipitation to indicate the general correlation between rainfall and extractions.

Municipal and Industrial (M&I) pumping is somewhat less affected by annual rainfall changes than agricultural irrigation. M&I pumping has been relative flat, with an average of 40,000 AFY pumped during the first decade of FCGMA reported pumping (1985-1994) and an average of 38,300 AFY pumping during the past five years (2001-2005). However, this flat pumping trend occurred as overall urban acreage increased (with an accompanying increase in potential water demand) as agricultural land has converted to urban use. An analysis of changes in land use during the period between aerial photos taken in 1998 and 2002 indicates that about 1,150 acres converted from agriculture to M&I in the Oxnard Plain and Pleasant Valley areas. At the FCGMA conversion rate of two AFY per acre, that represents about 2,300 AFY of new allocation to M&I during this four-year period.

5.0 WATER QUALITY ISSUES

Water quality issues are discussed in two parts: current issues that are evident today and potential future threats that could occur within the basins of the FCGMA if proactive steps are not taken now through management strategies.

5.1 CURRENT WATER QUALITY ISSUES

Seawater intrusion has long been the primary water concern within the FCGMA and was the problem for which the FCGMA was originally formulated to help fix. The intrusion occurs exclusively along the coastline in the Oxnard Plain basin. The U.S. Geological Survey also identified another type of saline intrusion on the Oxnard Plain – salts moving from the surrounding marine clays and older geologic units as pressure in the aquifers is reduced from overpumping. This type of intrusion may also be occurring on a minor scale in the Pleasant Valley basin. Chloride has also become a problem along Arroyo Las Posas, where groundwater from an area in the East and South Las Posas basins must be blended with lower-chloride water to meet irrigation suitability. This problem appears to have migrated downstream, with some of the City of Camarillo's wells now affected.

Chloride is also a problem in the Piru basin near the Los Angeles County line, where high chlorides from discharge of wastewater treatment plants along the Santa Clara River have

degraded the recharge water for the basin. This chloride problem is currently isolated to the Piru basin, although long-term recharge of poorer quality water could eventually move through the groundwater basins along the Santa Clara River and reach the Freeman Diversion.

High nitrate concentrations in groundwater are a localized problem in the Oxnard Plain Forebay and Santa Rosa basins. In and adjacent to the Forebay, nitrates affect drinking water wells of UWCD's Oxnard-Hueneme wellfield, mutual water companies, and the City of Oxnard, particularly during and following dry periods.

5.1.1 Seawater Intrusion

High chloride levels from intrusion of seawater were induced by lowered groundwater levels that formed a distinct pumping trough in the southern Oxnard Plain (Figure 13). In 1989, the U.S. Geological Survey initiated their Regional Aquifer-System Analysis (RASA) study in a cooperative effort with local agencies. As part of this and companion cooperative studies, a series of 14 nested well sites with three or more wells installed at each site, were drilled and completed at specific depths in the Oxnard Plain, Oxnard Plain Forebay, Pleasant Valley, and Las Posas basins (Densmore, 1996). Figure 14 shows the locations of the RASA well sites on the Oxnard Plain.

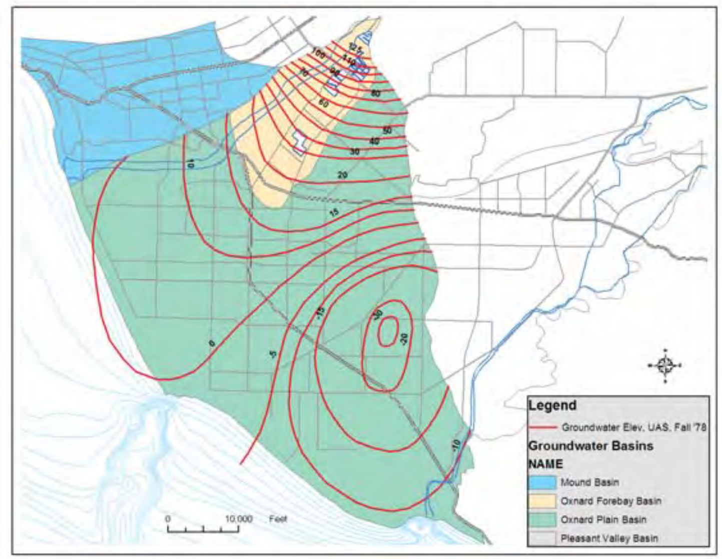


Figure 13. Groundwater elevations in the Upper Aquifer System in Fall 1978, indicating the large pumping trough in the south Oxnard Plain (water levels as much as 30 feet below sea level). This pumping trough, created by overpumping, pulled in seawater from the ocean.

Saline intrusion is recognized in monitoring wells by concentrations of chloride and Total Dissolved Solids (TDS) that are several times higher than the Basin Plan Objectives of 150 mg/L and 1,200 mg/L, respectively. In practice, the leading edge of the intrusion is mapped on the Oxnard Plain as the first occurrence of chloride in excess of 500 mg/L. In some wells that have been intruded, chloride exceeds 10,000 mg/L. The increase in chloride concentration has been rapid in some wells, increasing 1,000s of mg/L in a year or two.

Prior to the RASA study, it was believed an area extending from approximately 3 miles north of Port Hueneme to well SCE (near Highway 1) and south to Point Mugu was intruded by seawater. The installation of a dedicated monitoring network and detailed chemical analysis of water samples from the new wells and other wells yielded new interpretations on the extent of seawater intrusion on the Oxnard Plain. It is now known some areas of the southern Oxnard Plain are not intruded by seawater, but that high chloride readings from older production wells were the result of perched water leaking down failed well casings and contaminating the aquifer (Izbicki, 1992; Izbicki et al., 1995; Izbicki, 1996 a,b). As a partial result of these findings, many of the older wells on the Oxnard Plain have since been destroyed via a cooperative FCGMA-initiated program using Federal 319(h) grant money and matching funds contributed by the City of Oxnard, UWCD, FCGMA, and the County of Ventura. Figure 14 delineates the approximate extent of high-chloride water in the Oxnard aquifer (Upper Aquifer System). Figure 15 delineates the approximate extent of high-chloride water in the Lower Aquifer System.

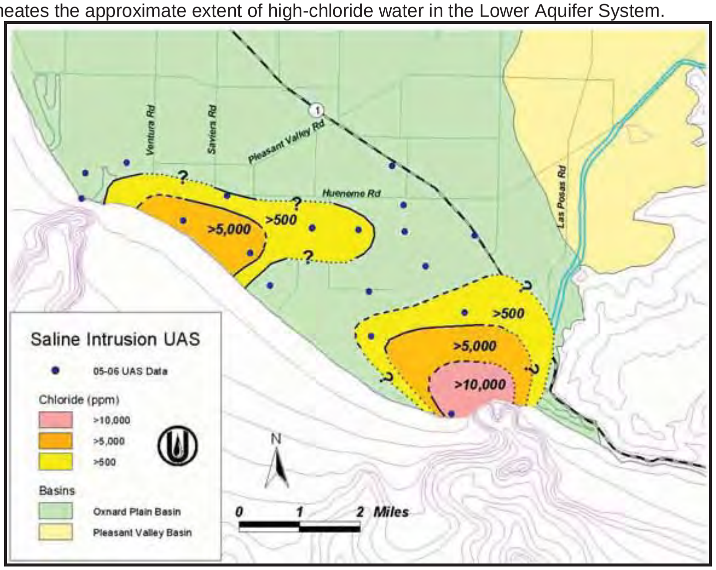


Figure 14. Areas of saline intrusion in the Upper Aquifer System of the Oxnard Plain in 2005-06. Contours of chloride concentrations indicate the maximum extent of the UAS saline intrusion – individual aquifers within the UAS may be less intruded. Contour lines are dashed where inferred and queried where uncertain. Bathymetric contour lines indicate the offshore submarine canyons where the aquifers are eroded along the canyon walls and exposed to seawater.

In addition to drilling and installing the nested monitoring wells, the USGS conducted geophysical surveys to determine the general extent of the high-saline areas (Stamos et al., 1992; Zohdy et al., 1993). This work indicated high-saline areas consisted of two distinct lobes,

with relatively fresh water separating the lobes (Izbicki, 1996a). The lobes identified by the USGS form the basis of the areas of high chloride concentration shown on UWCD maps.

Additional down-hole conductivity surveys by the USGS indicate the edges of the lobes are relatively distinct, with the first saline intrusion occurring in thin individual beds of permeable sand and gravel. As intrusion continues, more individual beds or geologic layers are impacted, resulting in increasing chloride levels within the affected aquifer. Thus, the interpretation of high-chloride areas shown on the maps combine measured concentrations from the monitoring wells, geophysical measurements, and study results about the nature of the intrusion front.

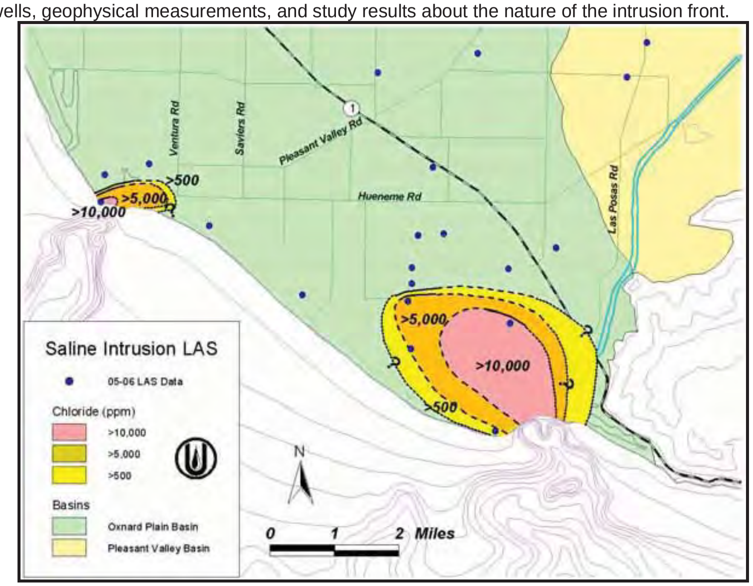


Figure 15. Areas of saline intrusion in the Lower Aquifer System of the Oxnard Plain in 2005-06. Contours of chloride concentrations indicate the maximum extent of the LAS saline intrusion – individual aquifers within the LAS may be less intruded. Contour lines are dashed where inferred and queried where uncertain. Bathymetric contour lines indicate the offshore submarine canyons where the aquifers are eroded along the canyon walls and exposed to seawater.

In addition to monitoring wells and geophysical measurements, isotope studies of groundwater samples from the nested wells indicate that the cause of the elevated chloride levels varies in the Oxnard Plain basin (Izbicki, 1991, 1992). Four major types of chloride degradation were documented:

Lateral Seawater Intrusion - the inland movement of seawater adjacent to the Hueneme and Mugu submarine canyons.

Cross Contamination - the introduction of poor-quality water into the fresh water supply via existing well bores improperly constructed or improperly destroyed, or via corroded casings caused by poor-quality water in the Semi-Perched zone.

Salt-Laden Marine Clays - the dewatering of marine clays, interbedded within the sand and gravel-rich aquifers and containing salts from their marine deposition, yields high concentrations of chloride-enriched water. This dewatering is the result of decreased pressure in the aquifers, caused by regional pumping stresses (excessive groundwater withdrawals).

Lateral Movement of Brines from Tertiary-Age Geological Formations - the lateral movement of saline water from older geologic formations caused by uplift along faults. An example is where older Tertiary rocks are in contact with younger aquifers across a buried fault face near Pt. Mugu.

5.1.2 Saline Intrusion from Surrounding Sediments

A significant portion of the salinity in the aquifers of the Oxnard Plain basin is coming from salts (primarily chloride) pulled from the surrounding sediments, as discussed in the previous section. When this saline intrusion occurs near the coastline, it largely resembles seawater intrusion in concentration and movement in the aquifer, and mitigation measures are similar to those for seawater intrusion (i.e., raising groundwater levels). In more inland areas such as the Pleasant Valley basin, chloride concentrations are generally less, with only a few wells showing any increase in chloride. It is too early to know whether chloride concentrations in the Pleasant Valley basin will escalate to a problem affecting local pumpers.

5.1.3 High Salinity Associated with High Groundwater Levels

Increased salt concentrations (chloride, sulfate, sodium) in aquifers underlying the Arroyo Las Posas in the East Las Posas, South Las Posas, and northern Pleasant Valley basins correspond in time with rising groundwater levels along the arroyo. This rise in groundwater levels has been created by increased recharge as natural streamflow was augmented by the addition of the upstream discharge of treated wastewater and aquifer dewatering projects along the arroyo. The shallow groundwater levels, which are higher than any historic levels, apparently leach salts from the previously unsaturated portions of the aquifer. The problem caused by high groundwater levels in the shallow aquifer has migrated down Arroyo Las Posas across the Las Posas basin and into the northern part of the Pleasant Valley basin, where water levels have risen and salts have increased. Solutions to this salinity problem will likely be based on removing and treating the high-salinity water.

5.1.4 Nitrate in Groundwater

High nitrates in groundwater primarily affect the Oxnard Plain Forebay and Santa Rosa basins. Nitrate is a primary drinking water standard (45 mg/L as NO3), so high nitrate concentrations directly affect the potable water supply. Nitrate is largely introduced into groundwater by man's activities in overlying recharge areas where the nitrate travels directly into the aquifers. Nitrate concentrations typically are a balance between nitrate input and the amount of recharge water available for dilution. Nitrate concentrations commonly increase during dry periods when there is less recharge water for dilution. In groundwater away from recharge areas, nitrates have generally been diluted and are at concentrations well below drinking water standards. An exception to this occurred in the 1990s, when nitrate occurred in City of Oxnard wells in the Oxnard Plain basin, just outside of the Forebay basin. This nitrate may have migrated downward from the Semi-Perched zone through improperly abandoned private wells.

The primary sources of nitrate are septic systems (especially if they are poorly maintained or being used above design capacity) and agricultural fertilizer. These are both being addressed.

As discussed below, septic systems have been prohibited in the Oxnard Plain Forebay basin. In addition, agricultural nitrate, contributed largely from fertilizers, will be monitored in 2006 as part of the Agricultural Irrigated Lands Conditional Waiver program adopted by the Los Angeles Regional Water Quality Control Board. If nitrates are shown to be entering groundwater from agricultural fertilizers through the monitoring program, the waiver requires the implementation of Best Management Practices.

5.2 WATER QUALITY ISSUES BY BASIN

5.2.1 Oxnard Plain Forebay Basin

The primary water quality concern in the Oxnard Plain Forebay basin is nitrate concentrations above the Department of Health Services' Maximum Contaminant Level. Nitrate concentrations in the Upper Aquifer System spike in the Forebay basin during dry periods when there is reduced recharge to the basin. Nitrate concentrations periodically exceed the primary drinking water standard of 45 mg/L (as NO3) in individual wells (Figure 16). Because much of the pumping in the Forebay delivers potable water through the Oxnard-Hueneme (O-H) pipeline (a potable water delivery line that provides groundwater to the cities of Oxnard and Port Hueneme), the drinking water standard is of prime importance. The O-H system has been able to deliver potable water by blending lower-nitrate water and by temporarily shutting down impacted high-nitrate wells.

These nitrates have been attributed to both agricultural activities (fertilizer application) and adjacent septic systems (leach-line effluent discharges). The nitrate problem will continue to be a water quality issue for drinking water wells as long as the sources of nitrate continue to contribute this mineral salt into the groundwater resources. As a result of the high nitrate concentrations, the Regional Water Quality Control Board enacted in 1999 a prohibition on septic systems in portions of the Forebay, with orders that most such disposal systems be eliminated from the Oxnard Plain Forebay basin before 2008. Since that time, disconnecting the nearby El Rio septic tanks and connecting to a sanitary sewer system has been a high priority water quality improvement project for the County.

5.2.2 Oxnard Plain Basin

The significant water quality issue in the Oxnard Plain basin is saline intrusion from both seawater and from surrounding marine sediments. Chloride degradation is directly related to groundwater levels in the basin. The water balance of the Oxnard Plain and the offshore component of the aquifer units is a dynamic balance between groundwater recharge, groundwater extraction, and change in aquifer storage. High groundwater levels in the recharge zone in the Oxnard Plain Forebay basin exert a positive pressure on the confined aquifers of the Oxnard Plain, and water flows from the recharge areas toward the coast (Figure 17). Whereas the pressure exerted by high water levels in the Forebay propagates rapidly through the aquifers, the actual movement of the water itself is slow, at approximately 3 feet per day or less in the Forebay (Izbicki et al, 1992). The pressure (piezometric) surface of the confined aquifer is diminished by the extraction of water from the system. If pressure heads at the coast fall below sea level, the lateral intrusion of seawater will occur. The dewatering of marine clays can occur if heads in the surrounding sediments remain below their historic levels for prolonged periods.

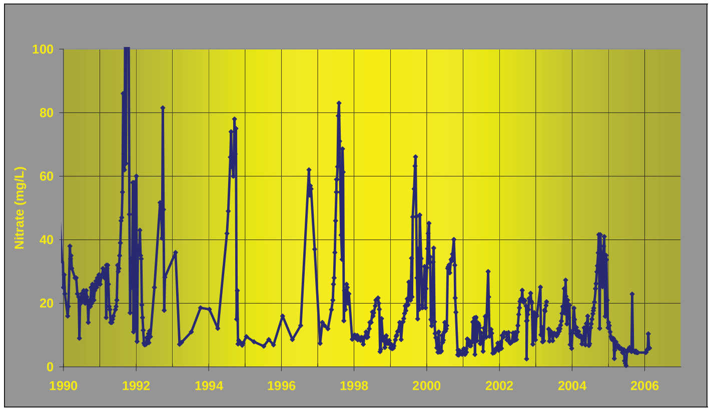


Figure 16. Nitrate concentrations (as NO3) in Oxnard-Hueneme El Rio well #5. Note that nitrate increases during dry portion of year, when nitrate input from overlying land uses is less diluted by low-nitrate recharge water. When nitrate levels are high, this well is either not used or the produced groundwater is diluted with low-nitrate water from other wells in the system.

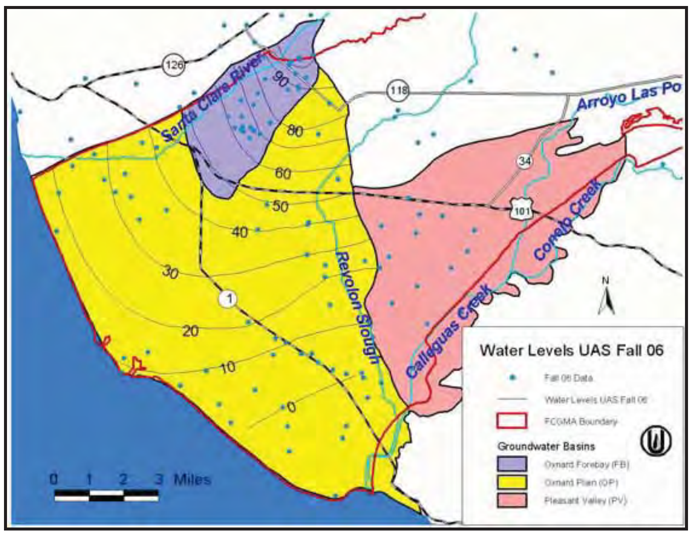


Figure 17. Groundwater elevation contours in the Upper Aquifer System, Fall 2006. Note that southeastern portion of Oxnard Plain remains below sea level (line labeled "zero") and is susceptible to continued seawater intrusion.

Chloride levels in coastal monitoring wells in the Upper Aquifer System show a direct relationship to groundwater levels – with groundwater levels below sea level, chloride levels increased in the early 1990s (e.g., well A1 in Figure 18). However, as the Freeman Diversion on the Santa Clara River began operation in 1991 and a series of wet years followed, the amount of recharge to the former pumping trough area and to the Port Hueneme area increased significantly. This has resulted in a rise in groundwater elevations on the Oxnard Plain and drastic reduction in seawater in some coastal monitoring wells (e.g., well A1 in Figure 18). In fact, the significantly intruded well A1 has returned to its pre-intrusion water quality levels and is currently (2006) within drinking water standards. This may be the first documented instance of such a reversal of seawater intrusion in a coastal basin.

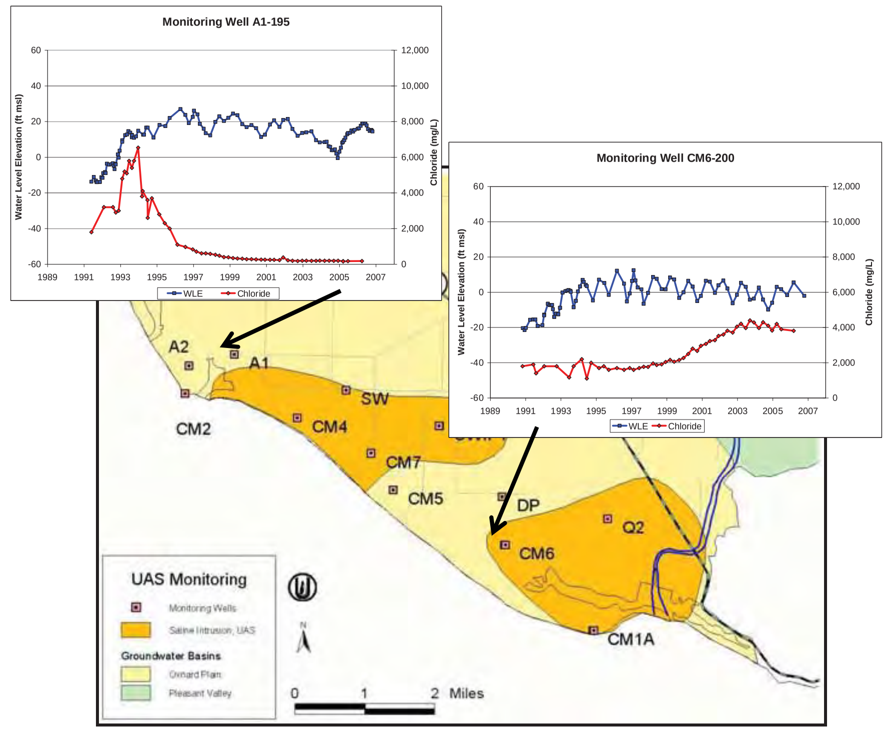


Figure 18. Chloride levels in two Upper Aquifer System coastal monitoring wells. Note that chloride levels have improved to drinking water quality in the A1 well (Port Hueneme lobe), whereas chloride levels continue to increase in the Point Mugu lobe. Uncertainties in exact configuration of saline lobes are indicated in Figure 14.

Despite some encouraging gains, however, the Upper Aquifer System is not completely restored. Although high recharge rates related to the increased flows from the Freeman Diversion have improved water levels and water quality south to Port Hueneme and the higher water levels appear to have eliminated the pumping trough, groundwater levels are still at or below sea level (Figure 17) and water quality continues to degrade in the southern portion of the Oxnard Plain near Point Mugu (e.g., well CM6 in Figure 18). It is likely that the pumping trough situation is similar to the one discussed next for the Lower Aquifer System – namely, that this portion of the Upper Aquifer System may be too far from the recharge areas for direct recharge to be effective, and must rely on artificial or in-lieu (surface water delivered and used in-lieu of pumping groundwater) recharge methods to transport replacement water from the Oxnard Plain Forebay basin or other sources of supply. Groundwater levels in the Lower Aquifer System in the south and southeast Oxnard Plain and central and southern portions of the Pleasant Valley areas have been consistently below sea level since at least the early 1950s (Mann, 1959)(Figure 19). The strategy to switch pumping from the Upper Aquifer to the Lower Aquifer has apparently been at least a portion of the cause for the low water levels and high chlorides that were encountered when the RASA monitoring wells were completed at LAS depths. These high chloride levels occur in several wells at the position of the two Upper Aquifer System seawater lobes (Figure 20).

U.S. Geological Survey studies indicated that the chloride in the LAS occurred not just from seawater intrusion, but also from slow dewatering of the surrounding volcanics and older sediments, as well as chloride-rich marine clays that serve as the aquitard between the Upper and Lower aquifer zones. After the U.S. Geological Survey findings became known and there was the realization the shift in pumping was actually mining LAS groundwater, the County of Ventura took action to change the County Well Ordinance (May 1999) so that only replacement wells or special situations would be allowed to draw water from the LAS; new wells would have to be drilled in the UAS.

The decline in Lower Aquifer System water levels from the late 1980s into the 2000s exacerbated a pumping trough extending from the coastline northeastward to the city of Camarillo (Figure 19). This trough is typically well below sea level, with the deepest portion as much as 180 feet below sea level during the drought of the late 1980s and early 1990s. Despite above-average rainfall in many of the preceding ten years, this pumping trough was still as much as 100 feet below sea level in the fall of 2006 (Figure 19).

Although FCGMA policies and new UWCD recharge facilities built over the last 20 years have significantly improved conditions in the Upper Aquifer System, the Lower Aquifer System continues to experience intrusion by saline waters. This saline intrusion comes both from seawater entering the aquifers along the coastline and from saline waters intruded from surrounding sediments. Any solution to this saline intrusion must include raising water levels in the Lower Aquifer System while concurrently keeping water levels in the Upper Aquifer System at their current elevations. One of the biggest groundwater challenges is to provide either additional recharge or an alternative source of water to the south Oxnard Plain and Pleasant Valley to prevent further water quality degradation in the Lower Aquifer System.

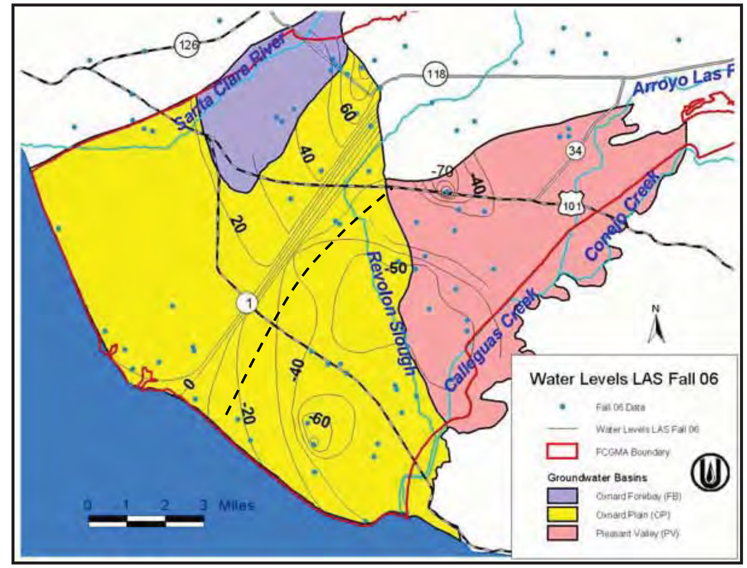


Figure 19. Groundwater elevation contours in the Lower Aquifer System, Fall 2006. Note the distinct series of troughs that extend from the ocean in the south Oxnard Plain northeastward toward Camarillo. These troughs are entirely below sea level. The dashed line indicates the approximate trend of the steep groundwater flow gradients that separate the recharge area in the Forebay from the south Oxnard Plain and Pleasant Valley pumping trough.

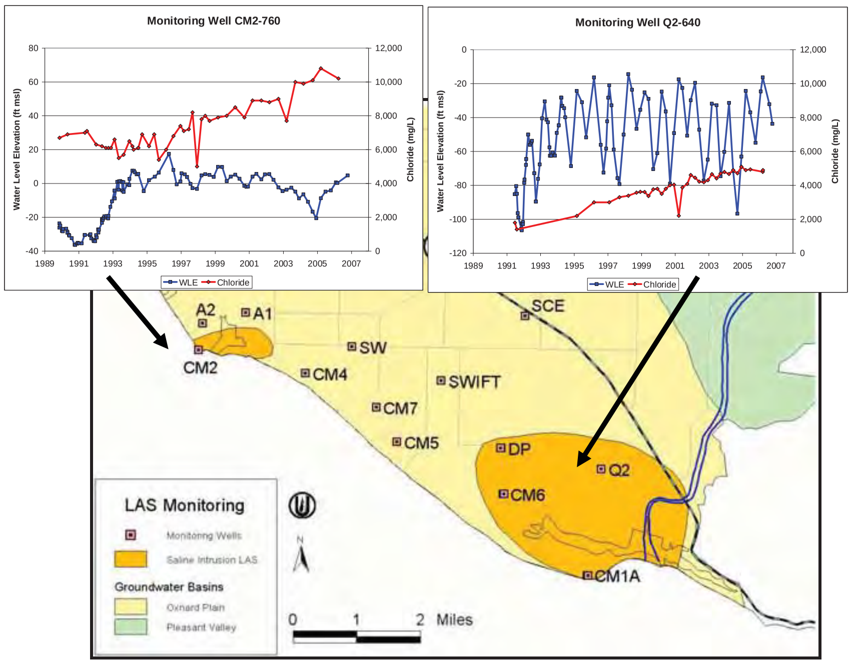


Figure 20. Chloride levels in two Lower Aquifer System coastal monitoring wells. Chloride levels continue to rise in the Point Mugu lobe, requiring new monitoring wells to be drilled inland of current wells to determine the extent of landward movement of high-chloride groundwater. Uncertainties in exact configuration of saline lobes are indicated in Figure 15.

5.2.3 Pleasant Valley Basin

Saline intrusion from surrounding sediments and salinity associated with high groundwater levels are the primary water quality concern in the Pleasant Valley basin. The potential for saline intrusion exists in the depressed groundwater elevations in the Lower Aquifer System of the Pleasant Valley basin (see previous section for discussion of these depressed groundwater levels). The area of depressed groundwater elevations extends from the City of Camarillo to the ocean (Figure 19). Chloride levels within the Pleasant Valley basin are generally less than 150 mg/L, but several wells have shown an increase in chloride. City of Camarillo wells near the Camarillo airport have been affected by the rising chlorides, with one well taken out of service. Increasing chlorides in other wells in the Pleasant Valley basin have recently been shown to have the geochemical signature of "oil-field production water" that underlies the fresh-water bearing aquifers in the basin (Izbicki et al., 2005). This poor-quality water likely was pulled up

along fault zones or other conduits towards the lower pressures of the LAS aquifer that were created by overpumping of the basin.

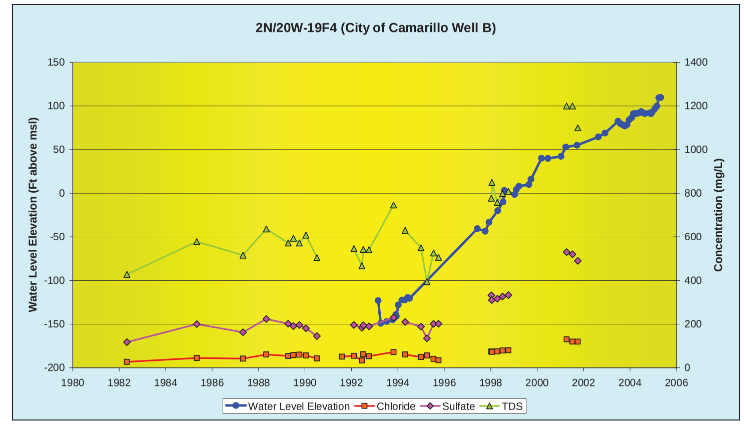


Figure 21. Salts increasing with groundwater elevations, northern Pleasant Valley basin.

Where Arroyo Las Posas crosses into the Pleasant Valley basin in the northern area of the City of Camarillo, the increased flows in the arroyo have raised groundwater levels in the area to historic highs (Figure 21). Coincident with this, water quality has degraded, especially for the constituents sulfate, chloride (Figure 21), iron, and manganese. As in the South Las Posas basin, this higher-salinity water will need to be treated for potable or irrigation use. The City of Camarillo has evaluated the feasibility of treating this poor-quality water, while reducing pumping in the areas of depressed groundwater levels (discussed in section 9.3 *Development of Brackish Groundwater, Pleasant Valley Basin*).

5.2.4 Santa Rosa Basin

The Santa Rosa basin has had long periods where nitrates in some areas were well above drinking water standards (as high as 200 mg/L). Chloride concentrations in the basin are generally between 100 and 150 mg/L, although they have spike locally above 200 mg/L. High chloride concentrations can affect crop production.

5.2.5 West Las Posas Basin

The water quality of the West Las Posas basin currently meets standards for irrigation and drinking water use. Within the pumping depression in the far eastern portion of the basin, samples from two wells have had increased chloride concentrations since 2004. It is not clear if this is the beginning of a trend or if these chlorides were transported into the basin from the shallow aquifer that is generally located along Arroyo Las Posas in the East Las Posas basin (the wells themselves are not along the arroyo).

5.2.6 East Las Posas Basin

Increasing concentrations of salts (chloride, sulfate, sodium) in the portion of the basin along the Arroyo Las Posas continue to be a problem in the East Las Posas basin. Chloride concentrations in the shallow aquifer beneath the arroyo can reach 360 mg/L, whereas chloride concentrations in the surface waters in the arroyo are in the range of 120-180 mg/L (Bachman, 2002). These increased chloride concentrations in the shallow aquifer are associated with historically-high groundwater levels (see discussion in section 5.1.3 *High Salinity Associated with High Groundwater Levels*) that apparently leach salts from previously-unsaturated sediments in the shallow aquifer along the arroyo. The groundwater that contains these chloride-rich salts recharges the Lower Aquifer System by moving downward from the shallow aquifer into the LAS, then northward into the basin. This recharge has formed a chloride-rich recharge mound beneath the Arroyo Las Posas (Figure 22) and northward into the main portion of the East Las Posas basin (Bachman, 2002). Individual wells along the south flank of the basin show a progression of filling of the shallow aquifer, with a coincident increase in chloride concentration (Figure 23). The following section on the South Las Posas basin discusses the age progression of this filling.

5.2.7 South Las Posas Basin

Water quality in the South Las Posas basin is dominated by the movement of salts discussed in the previous section. The filling of the shallow aquifer of the South Las Posas basin progressed from the upstream to the downstream portions of the basin (
Figure 24). With continuing dissolution of salts in the previously-unsaturated sediments, water quality could improve as the salts are expended. Two wells completed in the shallow aquifer beneath the arroyo that have had elevated salts for 20 years have shown a lessening of salinity in the past two years. It is not yet clear if these wells may be a precursor of further salt reduction as salts in the sediments are dissolved and the shallow aquifer begins to reflect the chemistry of surface water in the arroyo (which is higher in chlorides than pre-development conditions, but lower than the groundwater with dissolved salt).

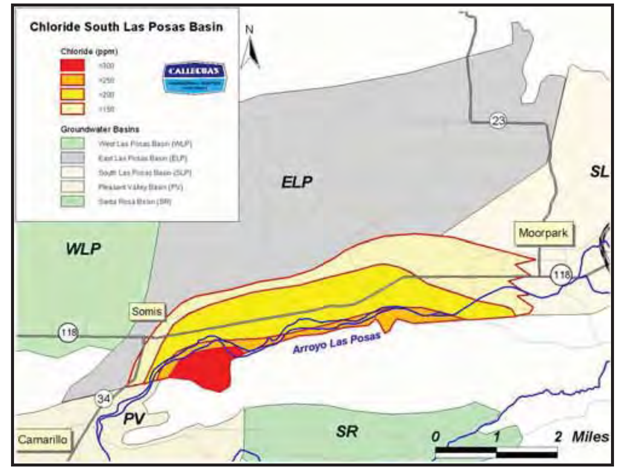


Figure 22. Chloride concentrations (2005-06) in aquifers beneath the Arroyo Las Posas in the East and South Las Posas basins. These concentrations have increased during the last two decades as the shallow aquifer beneath the arroyo has filled to its spill point, caused by increased flow in the arroyo from discharges from dewatering wells and wastewater treatment plants. (Bachman, 2002).

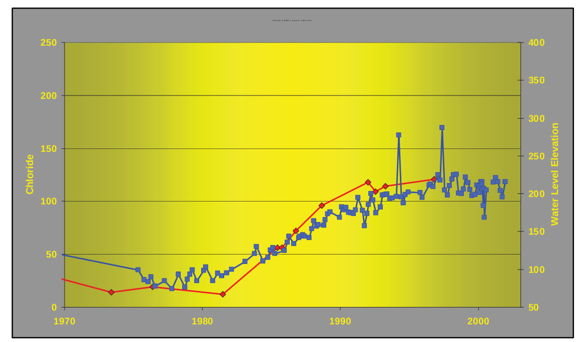


Figure 23. Coincidence of groundwater level rise (blue line with squares) and chloride concentrations (red line with diamonds) in a well in the shallow aquifer along Arroyo Las Posas (Bachman, 2002).

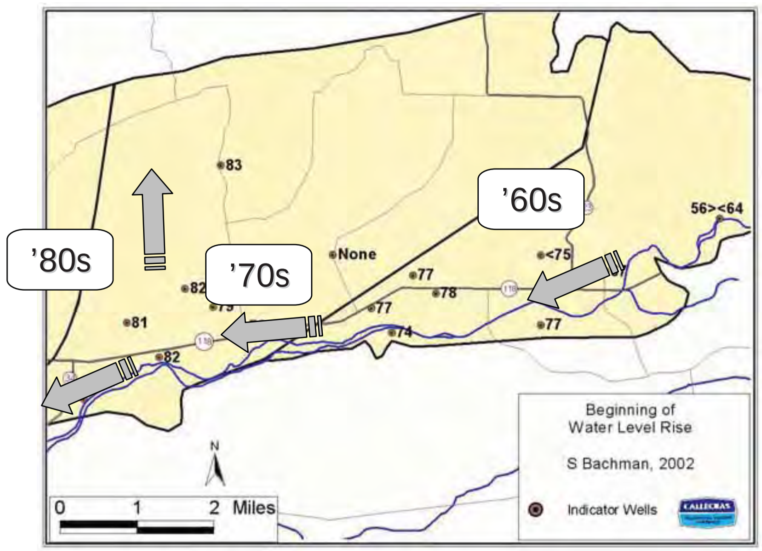


Figure 24. Beginning time of the progressive filling of the shallow aquifer along the Arroyo Las Posas in the South and East Las Posas basins. The number next to each well is the year when groundwater levels started to rise during the filling episode.

5.3 POTENTIAL FUTURE WATER QUALITY THREATS

An area of concern, discussed in the previous section, is potential water quality problems in the Pleasant Valley basin. With groundwater elevations as low as 160 feet below sea level, there exists the potential to pull significant amounts of lower-quality water from surrounding sediments, across or along faults, and from deeper depths (high salinity and/or petroleum-tainted water). Mitigation of these low water levels is important to avoid future water quality problems.

In the northern portion of the Pleasant Valley basin, within the City of Camarillo, increasing chloride concentrations could migrate into the main portion of the basin. However, the details of the hydrogeologic connections from the shallow aquifer to the Lower Aquifer System are still somewhat unclear. Likewise, salt-laden groundwater in proximity to California State University Channel Islands could also migrate from the shallow aquifers to deeper aquifers. This connection is also not well known and the mechanics of transport have yet to be adequately determined, although water level and quality monitoring from wells in the vicinity of the university suggests that the water quality in Lower Aquifer System wells is not affected by poor-quality water in the shallow aquifers. This suggests some barrier to vertical flow between the aquifers in this area.

There are also several other potential water quality concerns within the FCGMA basins. There is a number of leaking underground tanks, some of which have polluted the main aquifers in the basins. Past contamination has been localized and has been addressed through various clean-up operations mandated by the Los Angeles Regional Water Quality Control Board and the Ventura County Environmental Health Department. Water purveyors have become directly involved to ensure rapid cleanup operations in some areas. The FCGMA has lent it support to some of these efforts by water purveyors. There are also possibilities of more-widespread contamination by plumes of such contaminants as perchlorate. Large releases of perchlorate have occurred in the Santa Susana Mountains adjacent to Simi Valley and along the Santa Clara River in Santa Clarita (Los Angeles County). The FCGMA may have to be proactive in the future in ensuring that these and other potential sources do not adversely affect the FCGMA aquifers.

A matter of future water quality concern is the maintenance of current recharge projects that positively affect the Oxnard Plain. Environmental issues in the Santa Clara River and its tributary Piru Creek have the potential for reducing useable water resources – the amount of water available from stored water in Lake Piru and river water at the Freeman Diversion. Since these projects play an integral role in the current FCGMA water management strategies, any loss of yield from these projects would likely reduce some of the gains used in mitigating saline intrusion within the Oxnard Plain.

6.0 BASIN MANAGEMENT OBJECTIVES

6.1 CURRENT OBJECTIVES

Basin Management Objectives (BMOs) are quantitative targets established in a groundwater basin to measure and evaluate the health of the basin. For groundwater basins with seawater intrusion, a critical BMO is maintaining groundwater levels along the coastline to prevent the further intrusion of seawater. In addition, another BMO would be to maintain low concentrations, to the extent possible, of chloride at critical coastal monitoring wells. In inland areas, a BMO would be to ensure groundwater levels prevent conditions that cause groundwater quality degradation. A concurrent BMO would be to maintain concentrations of deleterious chemical constituents in groundwater, such as nitrate and chloride, at or below levels that are harmful to human or animal health or damaging to irrigated crops. Within the FCGMA, several BMOs are appropriate to measure and evaluate the health of the basins. Wells used as monitoring points for the Basin Management Objectives are shown in Figure 25 and described in the following paragraphs.

As part of the BMO attainment process, additional wells may be added to the monitoring process to provide early indications of improving or degrading aquifer conditions at critical locations. An example of such location would be at the north end of the Pleasant Valley Basin where poor quality water from the Las Posas Basin is apparently beginning to enter the Pleasant Valley Basin. This will be an iterative process that will allow the FCGMA to monitor both the current conditions and the relative success of basin management strategies implemented to control water quality in these areas.

6.1.1 Oxnard Plain Basin

The BMO most critical for coastal areas of the FCGMA is the maintenance of groundwater elevations high enough to prevent further seawater intrusion. Because the source of seawater is likely from offshore submarine canyons where the aquifers are truncated and in contact with seawater, coastal aquifers must have groundwater elevations high enough to prevent movement of seawater from the canyons to nearby onshore areas (see discussions in section 5.1.1 *Seawater Intrusion* and section 5.2.2 *Oxnard Plain Basin*). However, seawater is denser than fresh water and the heavier seawater exerts pressure on the fresh water aquifers exposed on the canyon walls – much like water pressure pushes on a diver's mask when the diver descends.

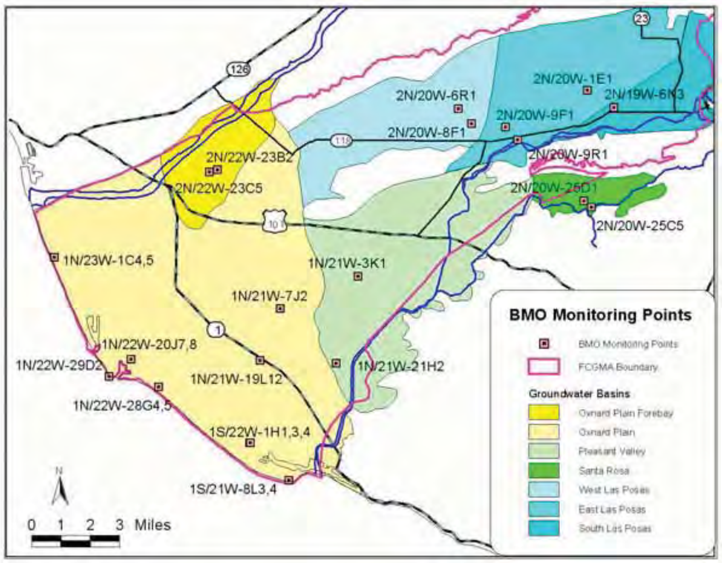


Figure 25. Wells used as monitoring points for Basin Management Objectives.

The pressure differential exerted on the fresh water aquifer depends upon the ocean depth where the aquifer is truncated along the canyon wall – there is the equivalent of 2.5 ft of head (pressure) exerted for every 100 ft of ocean depth. Therefore, an aquifer that is exposed on a submarine canyon wall at 200 ft ocean depth has 5 ft of head exerted on the aquifer by the more-dense seawater. To prevent seawater from intruding from the canyon wall and flowing through the aquifer to the coastline, coastal groundwater elevations must be, on average, at least as high as the head exerted by seawater. Thus, for the example given above, groundwater elevations in monitoring wells at the coastline must average at least 5 ft above sea level to prevent seawater intrusion. The greater ocean depth where the aquifer is exposed to seawater, the higher the average groundwater elevation required to prevent seawater intrusion.

A set of wells was selected to establish the BMOs for the Oxnard Plain basin (Figure 25). Many of these are coastal monitoring wells, completed at different aquifer depths within the Upper (Table 1) and Lower Aquifer Systems (Table 2). There are also several inland wells to detect if a new pumping depression forms in the UAS and if the existing pumping depression in the LAS dissipates. Coastal groundwater elevation objectives were determined using the groundwater elevation and water quality criteria in the preceding paragraph. Inland groundwater elevation objectives were determined such that there is a slight groundwater gradient from the inland areas to the coastline, thereby preventing further landward migration of the existing saline intrusion. The tables list the management objectives for each of the well completions.

The Ventura Regional Groundwater Model suggests that if these groundwater levels are maintained for an adequate period of time, additional saline intrusion will likely be minimized. Water quality objectives for chloride at these wells are also listed in the tables. These objectives follow the Regional Water Quality Control Board's Basin Plan Objective of 150 mg/L for chloride.

Well	BMO Groundwater Level (msl)	Current Level (msl)*	BMO Chloride (mg/L)	Current Chloride (mg/L)
1N/23W-1C5 (CM3-145, 120-145)	Average 3'	9.2'	<150	41
1N/22W-20J8 (A1-195, 155-195)	Average 4'	14.6'	<150	177
1N/22W-20J7 (A1-320, 280-320)	Average 8'	15.5'	<150	81
1N/22W-28G5 (CM4-200, 180-200)	Average 5'	9.0'	<150	237
1N/22W-28G4 (CM4-275, 255-275)	Average 7'	8.4'	<150	6,536
1N/21W-19L12 (SCE-220, 200-220)	Average 5'	11.3'	<150	67
1S/22W-1H4 (CM6-200, 180-200)	Average 5'	1.8'	<150	4,089
1S/22W-1H3 (CM6-330, 310-330)	Average 8'	-12.5'	<150	1,630
1S/21W-8L4 (CM1A-220, 200-220)	Average 5'	-4.9'	<150	16,917

Table 1. Basin Management Objectives for Upper Aquifer System wells in the Oxnard Plain basin. Well name and perforation depths follow State Well Number.

Well	BMO Groundwater Level (msl)	Current Level (msl)*	BMO Chloride (mg/L)	Current Chloride (mg/L)
1N/23W-1C4 (CM3-695, 630-695)	Average 17'	15.4'	<150	36
1N/22W-29D2 (CM2-760, 720-760)	Average 19'	0.2'	<150	9,783
1S/22W-1H1 (CM6-550, 490-550)	Average 13'	-33.3'	<150	3,512
1S/21W-8L3 (CM1A-565, 525-565)	Average 14'	-42.3'	<150	4,161
1N/21W-7J2 (PTP #1, 590-1280)	Average 20'	-52.0'	<150	42

Table 2. Basin Management Objectives for Lower Aquifer System wells in the Oxnard Plain basin. Well name and perforation depths follow State Well Number.

6.1.2 Pleasant Valley Basin

In the Pleasant Valley basin, groundwater elevation objectives were calculated to be slightly higher than coastal objectives to prevent landward migration of existing saline intrusion, and to

* Groundwater levels are average for last 10 years; chemical concentrations are average for last 3 years.

minimize vertical groundwater gradients that pull salts from encasing marine clays, from surrounding older marine and volcanic rocks, or from deeper waters within the oil fields of the basin. An additional BMO is to maintain chloride concentrations at or below the Regional Water Quality Control Board's Basin Plan Objective of 150 mg/L. These objectives are indicated in Table 3.

Well	BMO Groundwater Level (msl)	Current Level (msl)*	BMO Chloride (mg/L)	Current Chloride (mg/L)
1N/21W-3K1 (PV #4, 403-1433)	Average 20'	-47.2'	<150	107
1N/21W-21H2 (PV #10, 503-863)	Average 20'	-51.9'	<150	93

Table 3. Basin Management Objectives in the Pleasant Valley basin. Well name and perforation depths follow State Well Number.

6.1.3 Oxnard Plain Forebay Basin

In the Oxnard Plain Forebay basin, nitrate concentrations above drinking water standards have historically been a recurring problem. BMOs in the Forebay basin focus on protection of public drinking water wells (nitrate and TDS) and irrigation suitability (TDS). The management objectives are chosen for wells in the Oxnard-Hueneme wellfield (operated by UWCD) because this is the largest potable water system in the Forebay. The management objectives will maintain nitrate concentrations at one-half or less of the Maximum Contaminant Level for drinking water (45 mg/L of NO3 which is a primary drinking-water standard); at concentrations higher than the BMO of 22.5 mg/L, water purveyors must increase monitoring and reporting to the California Department of Health Services. The TDS objective is set at the Regional Board's Basin Plan Objective of 1,200 mg/L. These BMOs are set at two representative pumping wells (Figure 25) in the O-H Wellfield (Table 4).

Well	BMO Nitrate (as NO_3) (mg/L)	Current Nitrate (mg/L)*	BMO TDS (mg/L)	Current TDS (mg/L)
2N/22W-23B2 (135-277)	<22.5	13	<1200	1044
2N/22W-23C5 (140-310)	<22.5	8	<1200	1010

Table 4. Basin Management Objectives for the Oxnard Plain Forebay basin. Perforation depths follow State Well Number.

6.1.4 Las Posas Basins

In the South and East Las Posas basins, BMOs cannot be linked directly to observed groundwater levels, because the Calleguas MWD aquifer storage project (in-lieu deliveries and direct injection into the aquifer) creates artificially high groundwater levels that are not indicative of the state of the basin. Instead, the proposed East Las Posas Basin Management Plan (Appendix C) contains a method to use groundwater levels along with a computerized groundwater model to monitor the health of the basins.

The recharge mound that is moving northward from the Arroyo Las Posas (Bachman, 2002) has mobilized salts from the shallow aquifer (primarily located along the Arroyo) vertically downward into the Lower Aquifer System and then north into the main portion of the basin. This

* Groundwater levels are average for last 10 years; chemical concentrations are average for last 3 years.

subsurface movement of groundwater occurs because the head (pressure) in the LAS are lower than in the UAS. Therefore, an appropriate BMO for the East and West Las Posas basins is to maintain a chloride concentration that is suitable for agricultural irrigation use (this concentration is well below the standard for drinking water).

Monitoring points for these BMO chloride concentrations (Figure 25) were selected both in the degraded southern portion of the basin, as well as in areas unaffected by the migrating salts. The East and West Las Posas basins' objective for the chlorides is set at 100 mg/L to protect salt-sensitive crops such as avocados and berries (Table 5). It should be noted that salt concentrations, and especially chloride, are already high within the South Las Posas basin. This chloride is caused by groundwater at historically high elevations apparently dissolving salts from sediments that were historically unsaturated (see section 5.1.3 *High Salinity Associated with High Groundwater Levels*). Specific management strategies to address the South Las Posas basin are discussed later in this Plan. The BMOs for chloride and TDS in the South Las Posas basin are set at the average concentration of the surface water in Arroyo Las Posas, which is the concentration that would likely be attained when salts dissolved from sediments are either removed or have migrated elsewhere, and the groundwater then reflects the chemistry of its primary recharge source.

Well	BMO Chloride (mg/L)	Current Chloride (mg/L)§	BMO TDS (mg/L)	Current TDS (mg/L)
2N/20W-9F1 (906-1290)(ELP)	<100	164	<500	1,196
2N/20W-9R1 (456-724)(ELP)	<100	187	<500	1,330
2N/20W-1E1 (567-907)(ELP)	<100	28	<500	638
2N/20W-6R1 (1090-1512)(WLP)	<100	12	<600	520
2N/20W-8F1 (752-1406)(WLP)	<100	34	<600	410
2N/19W-6N3 (101-121)(SLP)	<160	150	<1500	1,500

Table 5. Basin Management Objectives for the Las Posas basins. Perforation depths and basin identifier follow State Well Number.

There are also specific water quality criteria for water injected into the East Las Posas basin as part of the Las Posas Basin ASR project. These criteria are included in a letter from the FCGMA to Calleguas MWD dated July 12, 1994 that approved the project as an injection/extraction facility. These criteria include: sodium absorption ratio 1-4 meq/L, TDS 100-800 mg/L, electrical conductivity not to exceed 1100 uMHO, chloride not to exceed 120 mg/L, boron not to exceed 1 mg/L, and nitrate (presumably as NO3) less than 45 mg/L.

6.1.5 Santa Rosa Basin

Basin Management Objectives for the Santa Rosa basin follow the Regional Board's Basin Plan Objectives (Table 6).

§ Groundwater levels are average for last 10 years, chemical concentrations are average for last 3 years.

Well	BMO Nitrate (mg/L)	Current Nitrate (mg/L)*	BMO Chloride (mg/L)	Current Chloride (mg/L)
2N/20W-25C5 (Unknown)	<45	116	<150	145
2N/20W-25D1 (UAS)	<45	60	<150	78

Table 6. Basin Management Objectives for the Santa Rosa basin. Aquifer designation (if known) follows State Well Number.

6.2 ASSESSMENT OF BASIN MANAGEMENT OBJECTIVES

The parameters for the proposed Basin Management Objectives (BMOs) are currently monitored on a regular frequency throughout the FCGMA, primarily by the VCWPD and UWCD. Along the coastline of the southern portion of the Oxnard Plain basin, BMOs are being met only in a portion of the Upper Aquifer System (see description and discussion of the Oxnard Plain basin in section 3.0 *Groundwater Basins and Hydrogeology*). Within the Lower Aquifer System, BMOs are significantly different than observed measurements. Groundwater levels are well below sea level both near the coastline and in a wide trough that extends into the Pleasant Valley basin beneath the City of Camarillo.

The Ventura Regional Groundwater Model was used to determine the effectiveness of current and future management strategies in meeting BMOs for groundwater levels. These results are reported under each management strategy and are summarized in Table 8 within the sections on management strategies. The model results were compared to the groundwater level goals set in the BMOs for each strategy that was amenable to evaluation by the model. For instance, strategies that involve shifting the place or amount of recharge and/or pumping can be effectively simulated using the model. Strategies that deal exclusively with water quality, such as reductions in nitrate sources, are not amendable to evaluation using the groundwater flow model.

When current management strategies are applied in the model, BMOs for groundwater levels are met or exceeded in 51% of the quarterly time-steps during the 55-year model period for the Upper Aquifer System (meaning that about half of the time groundwater levels are at or above the BMO values and half the time they are below) and only 5% of the time for the Lower Aquifer System. Successful management strategies are those where groundwater levels meet or exceed the BMOs at least half the time – meeting BMOs all the time is a more conservative approach, but requires much larger and more expensive strategies and does not take into account the natural climatic variations in groundwater levels that occurred even before the basin was pumped extensively. When coastal groundwater elevations are below the BMOs during dry periods, seawater could be pulled into the aquifers, but would then be pushed out during wet periods as groundwater levels rose above the BMOs. This has been the experience in the Upper Aquifer near Port Hueneme, where seawater moved inland and then receded with climatic variations in groundwater elevations below and above the BMOs for that area.

BMOs for LAS groundwater elevations are not being met in the Pleasant Valley basin because of this wide trough of depressed groundwater elevations (see map and discussion in section 3.0 *Groundwater Basins and Hydrogeology*). BMOs for chloride concentrations are not currently being met in all portions of the basin, with chlorides increasing in several wells. A study

conducted by UWCD (see following section) indicate some of these chlorides might be pulled from depth with "oil-field production water"[**] that underlies the fresh-water bearing aquifers in the basin (Izbicki et al, 2005). Chloride concentrations are being carefully monitored in the Pleasant Valley basin.

In the Oxnard Plain Forebay basin, BMOs are being met most of the time. However, nitrate concentrations in individual wells in the Oxnard-Hueneme wellfield have periodically been at or above the drinking water standard during drought. Currently, these high nitrates have been evident only during the driest portions of the year when pumping water elevations were at their maximum depth. Both fertilizers from overlying agriculture operations and numerous individual septic tanks are likely contributors to the recurring high nitrate levels in the Forebay, as discussed in the following section. Nitrate problems continue to plague the Santa Rosa basin as well. The high nitrate concentrations in the Santa Rosa basin are also believed to be caused by excessive fertilizer use and numerous individual septic systems.

Two emerging processes could significantly improve source control of nitrate within the FCGMA. Ventura County is in the process of eliminating hundreds of concentrated leach-line septic systems located in the El Rio area of the southern portion of the Oxnard Plain Forebay basin and the northern Oxnard Plain basin; the homes will be connected instead to the adjacent City of Oxnard wastewater system. In addition, the Conditional Discharge Waiver for Irrigated Lands is being put into effect in 2005-2006 by the Los Angeles Regional Water Quality Control Board. This process, with sub-watershed sampling of runoff from agricultural lands, will likely decrease the loading of nitrates from fertilizer through Best Management Practices and education. By 2010, the required monitoring will likely extend to agricultural waters that are percolating to groundwater, in addition to the current emphasis on surface waters.

In the East Las Posas basin, chloride concentrations are higher than the basin management objective in the two wells closest to the Arroyo Las Posas (wells 9F1 and 9R1, Figure 25). Chloride concentrations as high as 273 mg/L have been detected in these wells. Farther into the main portion of the basin, well 1E1 has chloride concentrations of less than 30 mg/L, well below the BMO. In the West Las Posas basin, chloride concentrations remain below the BMO largely because the fault that separates the West and East Las Posas basins appears to be an effective barrier to groundwater flow and the poor-quality water in the East Las Posas basin does not flow into the western basin. Of concern, however, is the recent transient occurrence of higher chlorides in two wells just to the west of the fault. It is not yet known if this is the beginning of wider-spread degradation or if this is caused by periodic overtopping of the fault by poor quality waters in the shallow aquifer along the Arroyo Las Posas.

7.0 YIELD OF THE GROUNDWATER BASINS

7.1 ORIGINAL FCGMA CALCULATION

The approximate yield of all basins within the FCGMA was calculated for the original management plan as approximately 120,000 AFY. This yield was based on a water budget for the year 1980, with estimates of the water balance for every fifth year to 2010. In the year 2010, there were estimated to be extraction rates 25% higher than recharge rates. This calculation is

[**] Izbicki compared the isotopic composition of the sampled groundwater with that of water produced with the oil that was pumped from nearby shallow oil wells.

the origin of the 25% pumping reduction required by the FCGMA. The potential inaccuracies in the assumptions that went into the original balance calculation were not discussed in the previous Management Plan, but they are likely to be relatively high (e.g., Bachman et al, 2005). Note that this yield is not basin-specific, which is discussed in more detail below.

7.2 DEFINITION OF BASIN YIELD

The yield of a basin is the average quantity of water that can be extracted from an aquifer or groundwater basin over a period of time without causing undesirable results. Undesirable results include permanently lowered groundwater levels, subsidence, or degradation of water quality in the aquifer. A basin is in overdraft if the amount of water pumped from the basin exceeds the yield of the basin over a period of time. This does not mean that the same amount of water must be pumped each year – pumping in individual years may vary above or below the yield of the basin during drought or wet years, or as part of basin management plans. If water management in the basin changes, the yield of the basin may change.

The term "safe yield" is often used in judicial proceedings for basin yield; it is determined by technical professionals and subsequently interpreted by courts to define the legal rights to extract groundwater in a basin (further discussion in Bachman et al, 2005). Outside of judicial proceedings, terms such as "perennial yield" are commonly used for basin yield. For the purpose of this Management Plan, the term "yield" is synonymous with "perennial yield" which follows the definition in the previous paragraph.

7.3 METHOD OF CALCULATING BASIN YIELD

To evaluate whether falling groundwater levels are likely to cause an undesirable result (i.e., whether the basin is presently in overdraft), a basin's water levels are evaluated over at least one complete hydrologic cycle to establish a trend. Since hydrologic conditions vary throughout each year and over long periods of time spanning multiple years, conditions must be analyzed over a long period (generally several decades) to accurately determine if the yield has been exceeded such that overdraft is present. If the trend suggests a continual drop in water levels over time, even after wet year conditions, then undesirable results are likely to eventually occur and the basin is considered to be in a state of overdraft.

Methods to determine basin yield include (e.g., Bachman et al, 2005):

- Hydrologic balance,
- Change in groundwater levels over an average hydrologic base period,
- Zero net groundwater level fluctuation,
- The correlation between groundwater levels and extractions,
- Change of storage vs. extractions,
- Calculation of groundwater inflow,
- Groundwater modeling,
- Annual retained inflow and change in groundwater levels,
- Pumping trough in a coastal aquifer (basin yield is exceeded if pumping trough at the ocean creates conditions for seawater intrusion).

The yield calculation for the 1985 FCGMA Management Plan used the hydrologic balance method – summing up all the water inputs and outputs to determine how much could be extracted from the basins. The calculation was not done over a period of wet and dry years, which is the current standard. The basin yield for this Management Plan was calculated using

the groundwater modeling method. This method integrates aspects of some of the other methods:

- A hydrologic balance is calculated in the model;
- One of the model outputs is a change in groundwater levels over an average hydrologic base period; and
- A pumping trough in a coastal aquifer is one of the criteria to determine if the basin yield has been exceeded.

The groundwater model technique is more rigorous than the 1985 hydrologic balance calculation because the calculation of a water budget depends upon inputs and outputs (Table 7) to the groundwater basins which can be difficult to estimate independently. The groundwater model also has similar inputs and outputs, but the groundwater model is calibrated to match actual measured groundwater levels over a long period of wet and dry years. This calibration of the groundwater model lessens some of the potential errors in a water budget calculation.

Model Parameter	Input	Output
Aquifer geometry	Yes	
Recharge, discharge areas	Yes	
Aquifer properties (e.g., transmissivity, storage coefficient)	Yes	
Boundary conditions at edge of model	Yes	
Faults	Yes	
Rainfall percolation	Yes	
Streamflow	Yes	
Recharge from adjacent bedrock	Yes	
Irrigation return flow	Yes	
Artificial recharge	Yes	
Pumping	Yes	
Groundwater elevations	For calibration	Yes
Groundwater flow from one area to another (horizontal & vertical)		Yes

Table 7. Inputs and outputs from groundwater flow model (Ventura Regional Groundwater Model).

The groundwater model used was constructed by the U.S. Geological Survey as part of their RASA study (Hanson et al, 2003), which has since been updated and upgraded by UWCD. The groundwater model is described in more detail in Appendix B. The model was also used to test the efficacy of various management strategies. The base period used for the model runs was 1944 to 1998, which encompasses several wet and dry cycles; this period was also used as a base period in the Santa Paula basin and Santa Maria basin adjudications during the last decade. The base period is only used in the model to simulate the natural hydrology over the 55-year period – modern and future man-made inputs and outputs such as water facilities, pumping, and artificial recharge are added to the model to determine both the current state of the basin and the future state of the basin with new management strategies applied.

There is little doubt that the coastal basins within the FCGMA have exceeded their yield and been in overdraft for several decades. The over-arching undesirable result of lowered groundwater levels has been seawater and other saline intrusion. A key aspect of the modeling was to determine the basin yield such that these undesirable results caused by lowered groundwater levels were eliminated.

Basins within the FCGMA that do not abut the coastline and do not themselves have saline intrusion cannot be evaluated directly for this undesirable result. The 1985 FCGMA Management Plan handled this by treating all the basins of the FCGMA as a common pool – an action in one of the basins would also affect the other basins – so pumping in one basin affects groundwater levels in adjacent basins. There is ample evidence that this proposition continues to be correct, with potentially two exceptions (East and South Las Posas basins). The Oxnard Plain Forebay, Pleasant Valley, West Las Posas, and Santa Rosa basins are all hydrologically connected to the coastal basins, evidenced by the continuity of groundwater elevation contours across their boundaries. The East and South Las Posas basins appear to be hydrologically disconnected within the subsurface from the other basins, separated from adjacent basins by either the north-south fault between the East and West Las Posas basins or a structural discontinuity between the basins and the northern Pleasant Valley basin at LAS depths. Thus, in this Management Plan, the East and South Las Posas basins are combined in determining basin yield and the remaining basins are combined for the same purpose. An example of this combination is the Oxnard Plain Forebay basin – although the basin regularly fills during wet periods, it is so directly connected to the Oxnard Plain basin (there are no hydrologic barriers preventing flow between the basins) that it is not considered separately in determining basin yield.

To determine the yield of the two sets of basins, groundwater levels calculated by the groundwater model for the 55-year forward model period were then compared to the section 6.0 *Basin Management Objectives* in the various basins to determine how close the modeled groundwater levels were to the objective groundwater levels. Because the model simulates conditions over several wet and dry climatic cycles, average modeled groundwater levels were compared to the objectives. The following section summarizes the results of these comparisons.

The basin yield calculation was accomplished in several steps:

1) The groundwater model was run in its 55-year forward model configuration (see Appendix B) with current management strategies included. If modeled groundwater levels were at or higher than Basin Management Objectives for more than half of the time, then undesirable effects such as seawater intrusion were less likely to occur and the basins were considered to be operated within their yield. If not, then the basins were considered to be operating in excess of their yield.

2) Groundwater extractions in the basins were either increased or decreased by stepwise amounts to determine the amount of pumping that would meet the criteria of modeled groundwater levels being at or above BMOs for more than half of the time, but not exceed, BMOs. Extraction were modified in two ways: a) changes were made proportionately to all wells in the basins within the FCGMA, and b) changes were made only in portions of the basins that were tailored to prevent undesirable effects (e.g., extractions were reduced in the south Oxnard Plain and Pleasant Valley only).

3) As an additional calculation, all of the management strategies in this Management Plan were combined in one model scenario to simulate whether Basin Management Objectives can be met when all the strategies were applied – in other words, can these objectives be met with the tools that may be available.

7.4 BASIN YIELD

When current strategies were applied in the Base Case groundwater model run (see Appendix B), groundwater levels in the Upper Aquifer System met or exceeded BMOs 51% of the time and in the Lower Aquifer System 5% of the time. These results are consistent with observed groundwater conditions today, where groundwater levels are close to BMOs in the Upper Aquifer (and seawater is largely being held back) and significantly below BMOs in the Lower Aquifer. Thus, both the model results and observed groundwater levels indicate that the basins within the FCGMA are not being operated within their yield under the current pumping patterns and management strategies – lowered groundwater levels create undesirable effects such as saline intrusion.

To determine basin yield, pumping was then reduced step-wise in the forward model until BMOs were met at least half the time during the model simulation. As indicated above, two methods of pumping reductions were used – GMA-wide and targeted only to the south Oxnard Plain and Pleasant Valley basins. The results of these model runs are shown in Figure 26.

Figure 26 indicates that when progressively greater pumping reductions are applied to all wells within the FCGMA, Lower Aquifer BMOs are attained at least 50% of the time when FCGMA pumping is reduced to about 65,000 AFY – about half of current average pumping. When the reductions are limited to the south Oxnard Plain and Pleasant Valley basins, overall FCGMA pumping is reduced to about 100,000 AFY to attain the same Lower Aquifer BMO goals. Because the significant lowering of groundwater levels has occurred in the south Oxnard Plain and Pleasant Valley areas, it is appropriate that this is where pumping reductions should occur, as they have through historic in-lieu water deliveries. Thus, 100,000 AFY appears to be an appropriate number for basin yield.

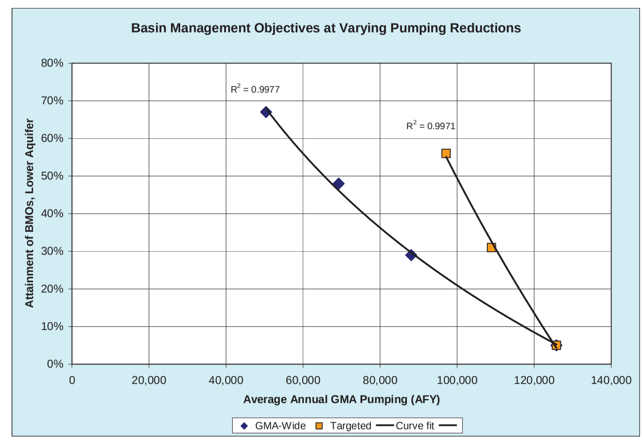


Figure 26. Groundwater model results from progressively reducing FCGMA pumping both agency-wide (diamond symbol) and targeted to the south Oxnard Plain and Pleasant Valley basins (square symbol). Results are indicated as percent of time that BMOs are met or exceeded in the Lower Aquifer System. R^2 values are indicated for the two curve fits.

There are three caveats to this calculation of basin yield:

1) Overall pumping in the south Oxnard Plain and Pleasant Valley areas was reduced by about 25,000 AFY (an 85% reduction). There are several approaches to achieve this reduction, with replacing the pumping with in-lieu deliveries being the primary historic method that is also favored in the management strategies discussed in this Plan.

2) The yield of the basins is not a forever-fixed number, but depends upon the projects in the basin – increasing the amount of recharge in the basins also increases the yield of the basins. Therefore, the yield of the basins must be recalculated periodically as new projects become operational and conjunctive use is increased.

3) When Lower Aquifer BMOs are attained 50% of the time, there should be no net movement of seawater within the aquifers. However, during dry periods there would be onshore gradients and during wet periods there would be offshore gradients. Thus, seawater may move landward during the dry periods and be pushed back during wet periods (which has been evident over the past 15 years at coastal Port Hueneme). To create conditions such that seawater could never move landward, the Lower Aquifer goals would have to be met nearly 100% of the time – an unrealistic goal that would require very large pumping reductions and create conditions where large quantities of fresh water were flowing to the ocean almost all the time. The 50% attainment of BMOs should be considered as an initial target level, but should be revisited as that goal is approached to ensure that it is sufficiently protective of the aquifers. If water quality problems continue as the 50% attainment level is approached, an increase in the attainment level should then be considered. Thus, the basin yield of 100,000 AFY that is tied to the 50% attainment level may have to be adjusted in the future.

An additional basin yield task was to apply all the future management strategies into one simulation of the model to determine whether Basin Management Objectives could be met if these strategies were in place. After applying the management strategies discussed in section 9.0 *Management Strategies Under Development* and section 10.0 *Potential Future Management Strategies*, the groundwater modeling indicates that Upper Aquifer BMOs could be met 67% of the time and Lower Aquifer BMOs could be met 76% of the time. Thus, application of the management strategies in this Plan apparently can solve the overdraft within the FCGMA.

8.0 CURRENT GROUNDWATER MANAGEMENT STRATEGIES

This Plan evaluated three types of management strategies for effectiveness: 1) currently implemented management strategies; 2) strategies under development where some action has already been taken to design and implement those strategies; and 3) potential future management strategies. Current strategies were evaluated by measuring their effect on changing groundwater levels and improving groundwater quality. Proposed and future strategies were evaluated using the Ventura County Regional Groundwater Model (an empirical computer simulation of groundwater flow described in Appendix B).

Several management strategies were adopted as part of the original 1985 FCGMA Management Plan. In addition, several other strategies were also implemented in the ensuing period since 1985. The previously-adopted 1985 FCGMA management strategies are discussed first, followed by the additional strategies. The effectiveness of these management strategies is then evaluated in the following discussion.

8.1 DESCRIPTION OF 1985 FCGMA MANAGEMENT PLAN STRATEGIES

The original 1985 FCGMA Management Plan specified several management strategies that would be implemented. These included the following general strategies.

8.1.1 Limitation of Groundwater Extractions

The most visible of the FCGMA strategies was the phased reduction in pumping within the FCGMA, implemented under FCGMA Ordinance No. 5 (now Chapter 5 within Ordinance No. 8.1). This strategy called for a 25% pumping reduction over a 20-year period via phased 5% incremental cutbacks to Historical Allocations every 5 years. As part of this strategy, pumping allocations, conservation credits, and agricultural irrigation efficiency allowances were implemented. To allow inherent flexibility, the Ordinance provides for Historical Allocation adjustments of no more than two acre feet per acre when land use changes from farming to municipal/industrial. A Baseline Allocation of one acre foot per acre was established for lands without allocations or lands that were developed after the baseline period ended in 1989 and were dependent upon groundwater. In addition, an Efficiency Allocation that allows farmers sufficient allocation to grow different crops as long as they remain at least 80% efficient (less than 20% of irrigation water runs off, leaches, or goes to deep percolation). Baseline and Efficiency allocations are exempt from the mandatory 25% reductions. To discourage overpumping, the FCGMA Ordinance imposes an extraction surcharge on all water pumped in excess of the annual allocation. The penalty initially ranged from $50/AF to $200/AF under a four-tiered system; however, that system was modified in favor of a single flat rate that was adjusted upward to $725/AF.

Ordinance No. 5, now part of Ordinance No. 8.1, also has a provision for establishing Conservation Credits by extracting less groundwater than the Historical Allocation. Conservation Credits can be used to avoid paying penalties when extractions exceed the allocation. A second type of credit, Injection or Storage, may be established and applied to future extractions when foreign water is injected or percolated into the aquifer. Conservation credits are allowed to accumulate with no restrictions, allowing some pumpers to accumulate credits for tens of thousands of acre-feet of water.

The required phased 5% reductions occurred in 1992, 1995, and 2000 for a current reduction of 15% of allocation for pumpers using their Historical Allocation. The planned additional 5% reduction for 2005 has been delayed per a request from M&I well owners who have asked for a re-evaluation of the effectiveness of such reductions as part of formulating this Management Plan.

8.1.2 Encourage Both Wastewater Reclamation and Water Conservation

The Ventura County Planning Department prepared a "Water Conservation Management Plan" which recommended various voluntary measures that could be employed to conserve water. Many farmers, individual households, and cities have adopted voluntary agricultural and urban water conservation programs. For several years, in the late 1980s and early 1990s, the County Planning Department designated Planner positions as "Water Conservation Coordinators." This program no longer has funding, but the water conservation program created material that continues to be distributed to schools and the public.

A Countywide Wastewater Reuse Study, prepared in 1981, identified wastewater reuse opportunities in the Las Posas Valley from either the Simi Valley Wastewater Treatment Plant or the Moorpark Wastewater Treatment Plant, and identified an opportunity to use recycled wastewater from the Thousand Oaks/Hill Canyon Wastewater Treatment Plant for irrigation on the Oxnard Plain. Since that report, the Moorpark Wastewater Treatment plant has upgraded to tertiary disinfection and a portion of the recycled water is supplied for irrigation to nearby golf courses. The Thousand Oaks/Hill Canyon project (now known as the Conejo Creek Diversion project) has been in operation for several years; it is discussed in the following section. In addition, the City of Oxnard's proposed recycled water project is discussed in section 9.1 GREAT Project (Recycled Water).

8.1.3 Operation of the Oxnard Plain Seawater Intrusion Abatement Project (UWCD's Pumping Trough Pipeline, Lower Aquifer System Wells, Freeman Diversion) –

The Pumping Trough Pipeline (PTP) was constructed in 1986 to convey diverted Santa Clara River water to agricultural pumpers on the Oxnard Plain, thus reducing the amount of groundwater extractions in areas susceptible to seawater intrusion (Figure 27). When river water is not available, five Lower Aquifer System wells pump water into the pipeline. The Freeman Diversion (1991), which replaced the former use of temporary diversion dikes in the Santa Clara River with a permanent concrete structure, now allows for diversion of river storm flows throughout the winter rainy season. As a side benefit, the Freeman Diversion helped stabilize the riverbed after years of degradation caused by in-stream gravel mining. The permanent Freeman Diversion increased the yield of the Seawater Intrusion Control Project by about 6,000 AFY over the previous means of temporary diversion.

8.1.4 Operating Criteria for the Oxnard Plain –

The combination of FCGMA policies and water conservation facilities have effectively moved pumping away from the coastline and from the Upper Aquifer System to the Lower Aquifer System. The switch in aquifer pumping is discussed in the next FCGMA strategy. The effectiveness of these criteria is discussed in section 8.3 Effectiveness To-Date of Current Management Strategies.

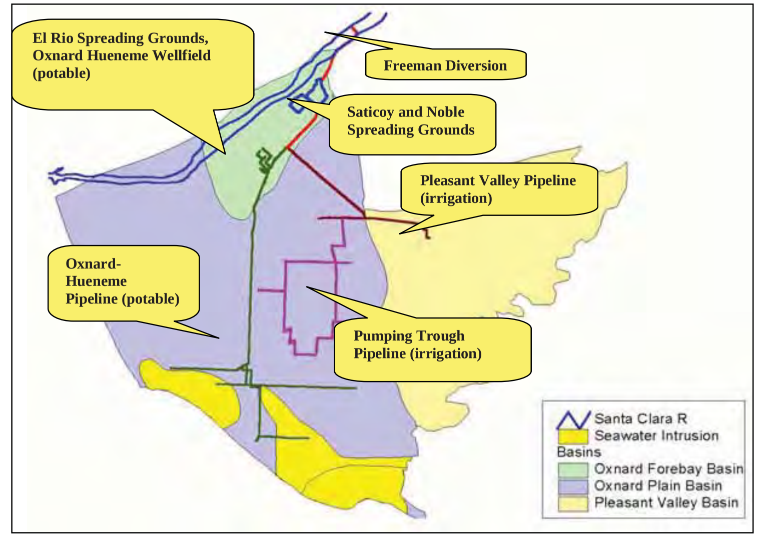


Figure 27. Elements of the Seawater Intrusion Control Project on the Oxnard Plain.

8.1.5 Construction/Modification Restrictions on Upper Aquifer System Water Wells –

In areas where they could cause overdraft or seawater intrusion in the Oxnard Plain basin, the County adopted a well ordinance that prohibited new wells in the Upper Aquifer System in the Oxnard Plain basin, instead requiring new and replacement wells to be drilled in the Lower Aquifer System. The effectiveness of this strategy is discussed in section 8.3 *Effectiveness To-Date of Current Management Strategies*.

This policy has now been shifted. A new policy for areas where pumping could cause overdraft or seawater intrusion in the Oxnard Plain basin (especially in what are called Sealing Zones 1 and 2 where multiple aquifer layers exist) was adopted by the County. This new well ordinance, adopted in 1998, prohibited new wells in the LAS beneath the Oxnard Plain, instead requiring new and replacement wells to be drilled into the more-easily replenished UAS. This shift in pumping was effected by a change in the County Well Ordinance to institute a complete reversal in which aquifers are targeted for production based on findings from the U.S. Geological Survey RASA study and observations from the network of monitoring wells. Since the County Well Ordinance was revised in 1998, only replacement wells or situations with no other water supply option available may tap into the LAS beneath the Oxnard Plain.

8.1.6 Annual Groundwater Monitoring Program

The FCGMA and UWCD participated with the USGS in installing (circa 1990) a series of multiple-completion nested monitoring wells along coastal areas of the Oxnard Plain basin and in a few inland areas. These wells allow measurement of groundwater levels and sampling of water quality at two to six discrete aquifer depths at each well site. These wells, in addition to a wide range of productions wells, are now being monitored at regular intervals by VCWPD and UWCD. The VCWPD findings are entered into a database and published as supporting data in various reports on water quality, groundwater basins, or special subject or area studies. UWCD enters its monitoring data into a database that is then augmented by monitoring data from VCWPD and California Department of Health Services (public supply wells). UWCD conducts an annual evaluation of all the monitoring results in its database and prepares an annual report that is available on UWCD's website (www.unitedwater.org).

8.1.7 Contingency Plan for LAS Seawater Intrusion

Although it was hoped that such a plan would never be needed, the FCGMA staff developed an as-yet-unfinished and informal contingency plan that consists of a list of possible measures that could be instituted to address intrusion of seawater into the LAS. The list items were only to be offered to the FCGMA Board as possible countermeasures in the event of a severe water quality decline in a significant number of LAS wells. This list included suggestions such as managing the intruded basin in a separate management scheme, further reductions in LAS well Historical Allocations, possible groundwater use restrictions by maximum volume per acre served (in the case of irrigated lands or per resident or dwelling unit in the case of urbanized areas), a complete ban on all future LAS wells regardless of need or circumstance, monetary or other potential incentives to encourage LAS well owners to destroy wells in favor of other possible water sources, and other such means of LAS management.

8.1.8 North (now called East and West) Las Posas Basin Pumping Restrictions

The FCGMA adopted Ordinance No. 4 (now Chapter 4 within Ordinance 8) that prohibits expansion of water use outside the Las Posas Basins and/or the Agency boundary, especially on the sensitive Aquifer Outcrop Zone or Expansion Area. The Aquifer Outcrop Zone is that land or geographic area where the Fox Canyon and/or Grimes Canyon aquifers reach the ground surface and are exposed as outcrops. Ordinance 4 restricts or precludes use of any harmful land uses in this zone (such as impervious surfaces, septic systems, pesticides, fertilizers, or groundwater withdrawals), because this area acts as a direct conduit to the usable aquifer water stored at depth. The Expansion Area was defined as that portion of land from the crest of the hill or 1.5 miles beyond the Agency boundary (northernmost extension of the Aquifer Outcrop) that drains into the Agency. Because groundwater quality protection and prevention of volume exports are the prime subjects of these laws, the Expansion Area was officially designated as an official Sphere of Influence zone by the Ventura LAFCO (Local Area Formation Commission). No wells, no additional agriculture, and only very limited single family home development is allowed in these areas, and only under special restrictions and circumstances.

8.1.9 Monitor FCGMA Groundwater Extractions to Ensure That They Do Not Exceed Adopted Projections for That Basin

The FCGMA requires semi-annual reporting of extractions from pumpers within the Agency as part of the measures instituted within Ordinance No. 5 (now Ordinance No. 8). These data are entered into a database maintained by the FCGMA. Individual operator annual extractions are compared against allowed allocations or irrigation efficiency at the end of each calendar year to determine whether well operators are within their allowed pumping. As discussed under the first

strategy on limitations of groundwater pumping, penalties are assessed for overpumping, and credits are posted for conservation or storage.

8.1.10 Implementation of Drilling and Pumping Restrictions

This strategy is discussed as part of several of the strategies above and is supported by the County Well Ordinance and the cooperation of water districts and well owners.

8.1.11 Metering of Groundwater Extractions

As part of the original Ordinance No. 5, extractions must be reported to the FCGMA on a semi-annual basis. Ordinance No. 3 (now Chapter 3 within Ordinance No. 8) required water flow meters to be installed at owners' expense on all groundwater pumps except domestic users on one acre or less. Not all pumpers have installed meters or use their meter readings to report extractions. Resolution 2006-1 requires periodic accuracy calibration of every water flow meter by independent testing agents. This Resolution also tightened requirements and imposed restrictions on well extraction reporting in addition to adding more strict penalties for non-compliance.

8.2 DESCRIPTION OF OTHER CURRENT STRATEGIES

There are several other groundwater management strategies that have been implemented within the FCGMA area that were not foreseen when the original management plan was formulated some 20 years ago. These include:

8.2.1 Fox Canyon Outcrop Expansion Area

A buffer zone ("Expansion Area") along the outcrops of the Fox and Grimes Canyon aquifers, which are adjacent to and outside of the FCGMA boundaries, was established in 1997. This zone was established to protect any land uses on the outcrop or within the Agency that might adversely affect groundwater recharge, groundwater extractions, or water quality.

8.2.2 Noble Spreading Basins

The Noble Spreading Basins (1995), across Los Angeles Avenue opposite UWCD's Saticoy Spreading Grounds, were constructed to store and recharge additional Santa Clara River water diverted at the upstream Freeman Diversion, particularly during wet periods. These relatively shallow basins were reclaimed gravel pits purchased by UWCD and reconfigured as water spreading basins. Water placed in the facility recharges both the Upper Aquifer System and the Lower Aquifer System. The ten-year average for the facility is 6,000 AFY, with individual years varying from 0 AF to 17,800 AF.

8.2.3 Las Posas Basin ASR Project

The FCGMA in 1994 approved Calleguas MWD's Las Posas Basin Aquifer Storage and Recovery (ASR) project as an Injection/Storage Facility. This allowed Calleguas MWD to receive Storage Credits for water recharged as part of the project. Conditions of the approval included registration of the injection/extraction wells, monthly reporting of injection/extraction volumes, water quality requirements for injected water, a limit on the amount of water in storage (300,000 AF), required points of extraction, a limitation to use the stored water only within Ventura County, periodic review of injection/extraction effects, and an agreement to halt operations if any conditions are not met. As of 2006, Calleguas MWD has stored over 60,000

AF of water through in-lieu deliveries to basin pumpers and direct injection. Although most extractions have been for testing and maintenance purposes, full-scale extractions occurred during January 2007 to supply customers during a scheduled maintenance shut-down of the supply line bringing State Water to Calleguas MWD.

8.2.4 Conejo Creek Diversion Project

The Conejo Creek Diversion Project (2002), constructed by Camrosa Water District just south of where Highway 101 crosses Conejo Creek, diverts flows from the creek and delivers the water to Pleasant Valley County Water District to meet local irrigation demands within the overdrafted Pleasant Valley basin. The water diverted from the creek is a combination of natural stream flow and recycled water released into the creek from wastewater treatment plants upstream. This diverted water replaces Lower Aquifer System pumping in the Pleasant Valley basin. The contractual amount of water from the diversion is 3,000 AFY (if available), although an average of 5,300 AFY has been diverted in the first four years of operations. These diversions may increase temporarily, but are likely to decrease over the next 20 years as the recycled water is used elsewhere by Camrosa Water District customers.

8.2.5 Supplemental M&I Water Program

The Supplemental M&I Water Program is operated through the Oxnard-Hueneme (O-H) Pipeline system. The joint UWCD-Calleguas MWD project uses FCGMA credits earned by Pleasant Valley County Water District from the Conejo Creek Diversion Project to supplement O-H water supply. This project effectively shifts Lower Aquifer System pumping in the Pleasant Valley basin to Upper Aquifer System pumping in the Oxnard Plain Forebay basin. The program is capped at 4,000 AFY and is only implemented in years when groundwater levels in the Forebay are sufficiently high to prevent harm to other Forebay pumpers. The program effectively reimburses Calleguas MWD for their investments in the Conejo Creek project, a precedent that may allow similar types of projects in the future.

8.2.6 Saticoy Wellfield

The UWCD Saticoy Wellfield (2005) was constructed adjacent to the UWCD Saticoy Spreading Grounds to pump shallow water from the recharge mound underlying the spreading grounds in wet years and deliver the water to users along United's existing agricultural pipeline system (Pleasant Valley and PTP pipelines). This pumping from the Oxnard Plain Forebay basin decreases the recharge mound, allowing more spreading and groundwater recharge from the basins during wet periods. The water produced by the pumping in the Forebay replaces LAS groundwater pumping along the Pumping Trough Pipeline (PTP) and Pleasant Valley (PV) Pipelines.

8.2.7 Importation of State Water

The County of Ventura holds a State Water allocation of 20,000 AFY administered by the California Department of Water Resources (DWR). This allocation is divided among UWCD, the City of Ventura, Port Hueneme Water Agency (as a sub-allocation of UWCD's portion), and Casitas MWD. UWCD uses its allocation to supplement recharge to the aquifers along the Santa Clara River within Ventura County. UWCD's 3,150 AFY allocation (UWCD's allocation was 5,000 AFY, but the Port Hueneme Water Agency acquired 1,850 AFY of the allocation) is ordered from DWR during normal and dry years for delivery to Lake Piru via stream releases from the DWR-operated Lake Pyramid downstream along Piru Creek. This State Water is then released from Lake Piru as part of UWCD's normal conservation release in the late summer and fall. As this water flows down Piru Creek and the Santa Clara River, a portion of it percolates into the groundwater basins along the river (Piru, Fillmore, and Santa Paula) and a portion reaches the Freeman Diversion for recharge to the Oxnard Plain.

This recharge is not credited by the FCGMA to UWCD directly, but based on many years of study, measurement, and computer modeling, the portion of the DWR purchased water that ultimately reaches the Freeman Diversion is credited as new or foreign water. The credits are placed in a UWCD-held trust fund that may be used in the future to solve common FCGMA management issues that are beneficial to the aquifers within the Agency. The Port Hueneme Water Agency's 1,850 AFY is delivered via Calleguas MWD's conveyance facilities. Except for 2,000 AF imported in 2002, no other portion of the 20,000 AFY entitlement has ever been imported to Ventura County, although annual capital costs continue to be paid to DWR to maintain this Allocation. Additional importation of State Water is discussed in section 10.0 *Potential Future Management Strategies*.

8.2.8 Additional Groundwater Monitoring

As saline intrusion has encroached further inland beneath the south Oxnard Plain, saline waters have moved eastward of the existing monitoring well network in some areas. In 2006, UWCD will install two additional nested monitoring well sites north of Mugu Lagoon, with funds obtained from a Department of Water Resources grant. These monitoring wells will be incorporated into the monitoring network and sampling protocol for the existing dedicated monitoring wells.

8.2.9 Calibration of Groundwater Extraction Meters

Resolution 2006-1 was adopted by the FCGMA Board that will phase-in a flow meter calibration and inspection program over three years. After the phase-in, each meter will be required to be checked at 3-year intervals.

8.3 EFFECTIVENESS TO-DATE OF CURRENT MANAGEMENT STRATEGIES

The management strategies applied over the past 20 years to combat seawater intrusion have resulted in significant changes in water levels and in water quality indicators in the FCGMA aquifers. Conditions in the Upper Aquifer System (UAS) have improved with groundwater elevations increasing to, or exceeding, acceptable levels and chloride-impacted water decreasing in both concentration and geographic extent in most areas. However, water quality conditions in the Lower Aquifer System (LAS) have worsened over this same time period. Specifically, LAS groundwater elevations in the southern portion of the Pleasant Valley Basin and southern Oxnard Plain Basin have decreased and remained well below sea level and salinity has increased in both concentration and geographic extent. This has occurred for two reasons. First, the combined UAS and LAS extraction in this area has exceeded levels the resource can support. Second, policies adding recharge to the UAS and switching pumping from the UAS to the LAS have relieved the stress on the Upper Aquifer but increased the stress on the Lower Aquifer.

The FCGMA policy of reduced pumping has had positive effects in all the aquifers. For pumpers using their Historical Allocation under Ordinance No. 5, there has been a pumping reduction in excess of the 15% currently required by the FCGMA. There have been only isolated incidents of pumping in excess of allocation, reflecting both the general acceptance of the pumping reductions and the stiff monetary penalty for overpumping. For agricultural pumpers using an Irrigation Efficiency calculation, pumping reductions have been even more dramatic. In a study using the FCGMA weather stations to calculate daily crop water demand, Agency-wide irrigation efficiency (measured by less reported water use compared to FCGMA-computed crop water demand) improved by about 30% during the first several years of the FCGMA pumping reductions (UWCD, 2002). The increased efficiency is consistent with the decreased extractions reported to the FCGMA over the last decade (see section 4.0

Groundwater Extractions). Widespread acceptance and installation of drip tape, micro sprinklers, mini sprinklers, leak repairs, computer controlled watering cycles, farm-operated weather stations to assist with irrigation frequency and duration, various ground-based moisture sensors and lysimeters, farmer and irrigation crew education, and a shift away from wasteful furrow irrigation or high volume sprinkler heads, along with reduction of tailwater losses have all contributed to the reduction in groundwater use.

One of the key hydrogeologic findings over the last 10 years indicated that a zone of lower conductivity (such as a fault or some other deformation) extends from the Camarillo Hills to Port Hueneme (aligned with the known location of the Simi-Santa Rosa fault in the Camarillo Hills) limiting the amount of recharge that can flow from the Oxnard Plain Forebay basin into the south Oxnard Plain and Pleasant Valley areas. This zone appears to be limited to the Lower Aquifer System, with no evidence that the lower conductivity zone extends upward into the Upper Aquifer System. In these areas of the LAS, extractions far exceed recharge, resulting in groundwater levels that have fallen to well below sea level from the ocean inland to the City of Camarillo. Three current projects recharge these critically overdrafted areas: diverted Santa Clara River water is delivered via the Pleasant Valley and Pumping Trough pipelines and diverted Conejo Creek water is delivered via the Conejo Creek project. These three projects deliver in-lieu recharge to the south Oxnard Plain and Pleasant Valley basins (the delivered surface water is used for irrigation in-lieu of pumping groundwater).

However, the Pumping Trough Pipeline (PTP) operated by UWCD provides mixed effects in reducing pumping in the Lower Aquifer System. The diverted Santa Clara River supplies delivered to PTP customers in-lieu of pumping groundwater have unambiguous benefits in helping to eliminate the pumping trough in the Upper Aquifer System and helping eliminate overdraft in the Lower Aquifer System. But the PTP project also has five LAS wells that provide irrigation water to customers along the pipeline when there are insufficient supplies in the Santa Clara River available for diversion and delivery. These wells were completed in the LAS because at the time the LAS was in better shape than the UAS. Since the UAS has substantially recovered from overpumping but the LAS has been severely depleted, these five LAS wells are no longer optimally-located; they now pump from the flank of the large pumping depression in the LAS of the south Oxnard Plain and Pleasant Valley basins. Thus, one of the previously-assumed solutions to reduce groundwater extractions within the pumping trough of the UAS has created new problems in the LAS. Some of this LAS pumping for the PTP project is being replaced by UAS pumping from the UWCD Saticoy Wellfield (located in the Oxnard Plain Forebay basin); this strategy should be maximized in the future.

One of the FCGMA strategies historically underutilized is the substitution of recycled water for groundwater pumping. The Conejo Creek project has begun the process of using recycled water which originates in the City of Thousand Oaks. Other recycled projects are not yet operational (e.g., see later discussion of the City of Oxnard's GREAT project).

The Ventura Regional Groundwater Model was used to test the future effectiveness of current projects to reduce the overdraft in the FCGMA basins. This analysis assumes that hydrological conditions of the past 50 years are similar to future conditions, that projects continue to be implemented as designed, and that FCGMA reported pumping is relatively accurate. This modeling indicates that when all current projects that implement the FCGMA Management Plan are operational, there will still be an overdraft in the basins within the Agency. With only current strategies in place, BMOs for groundwater levels would be met 51% of the time in the Upper Aquifer and 5% of the time in the Lower Aquifer (see Appendix B). This analysis is derived from the model Base Case, which uses reported pumping over the past 10 years as the basis for

modeled extractions. If actual pumping was higher than reported, then the model would have to be recalibrated to reflect this. A sensitivity analysis was conducted to examine the effect of understated pumping in the model (Appendix B, section A2.2.2 *Sensitivity Analysis – Understatement of Reported Extractions*), which indicated that if agricultural pumping was understated by 15% (caused by poorly-calibrated meters or inaccuracies in other reporting methods), results from the current model could be up to 15 feet too high in the Lower Aquifer (the aquifers would be in worse shape than modeling suggested). If the model was recalibrated to reflect this understatement of pumping, these results would be corrected.

It is clear both from the modeling results and from the observation that BMOs are not being met in many areas, and that additional management strategies and projects must be initiated to alleviate this continued overdraft. The following sections address this need.

9.0 MANAGEMENT STRATEGIES UNDER DEVELOPMENT

There are several projects at various stages of development that will further reduce water supply and water quality problems within the FCGMA. Some of these projects follow the original management strategies of the Agency, whereas others deal with issues not contemplated in the original management plan. The strategies are presented in the order of their impact on the aquifer (high impact strategies are discussed first), with projects under development discussed in this section and future strategies discussed in the following section. The ranking of both strategies under development and future strategies that were amenable to testing with the groundwater model is indicated in Table 8. For strategies that could not be directly evaluated with the groundwater model (because there was no change in the place or amount of recharge or pumping), other ranking factors are discussed with each strategy.

Strategy	UAS ΔWL	Meet UAS BMOs	LAS ΔWL	Meet LAS BMOs
Current Strategies		**51%**		**5%**
Barrier Wells	+11’	63%	+46’	48%
GREAT Project	-1’	51%	+38’	36%
Injection River Water	+1’	53%	+7’	11%
Shift Pumping UAS	-1’	50%	+8’	9%
Increase River Diversions	+3’	54%	+3’	8%
Addtl Recharge S Oxnard	+1’	53%	+4’	7%
Continue 25% Reduction	+1’	53%	+2’	7%
Import State Water	+2’	54%	+1’	7%
RiverPark Recharge	<1’	52%	<1’	6%
Shift Pumping NW Oxnard	<1’	51%	<1’	5%
All Strategies	**+15’**	**67%**	**100’**	**76%**

Table 8. Ranked results of groundwater modeling of management strategies amenable to evaluation with the groundwater model. The table indicates the average change in groundwater levels expected in each aquifer <u>at the wells for which there is a BMO</u> for each strategy. The table also indicates the average amount of time that groundwater levels were at or above BMOs for each aquifer (see discussion of this technique in section 6.0*Basin Management Objectives*).

9.1 GREAT PROJECT (RECYCLED WATER)

The GREAT (Groundwater Recovery Enhancement and Treatment) project is ranked highest of the projects under development because of its effectiveness in reducing Lower Aquifer overdraft (see Table 8). However, the most effective portion of the project would occur at 10 to 15 years from now, when all components of the project are scheduled to be in place.

9.1.1 Description

The project is being designed and implemented by the City of Oxnard. The project has three major components: 1) a new regional groundwater desalination facility; 2) a recycled water system to deliver water to M&I non-potable water uses within the City of Oxnard, to deliver water to agricultural users in the Pleasant Valley area, and to inject water as a barrier to seawater intrusion; and 3) conveyance of desalination backwash concentrates through a brine line to either the City's existing ocean outfall or the Ormond Beach area for coastal wetland restoration. Potable water supplies for the City would then be pumped from the Forebay by utilizing FCGMA credits earned from both direct recharge (barrier wells) and in-lieu recharge (M&I non-potable and agricultural deliveries). This Forebay supply could be pumped from existing Oxnard-Hueneme system UAS wells, existing City wells, and/or new City wells. The FCGMA would have to approve recharge and pumping facilities, as well as implement policies discussed later in this section.

The project will be constructed in phases, with project yield ramping up over time from around 5,000 AFY to more than 21,000 AFY. Actual timing of construction will depend upon projected growth in water demand and funding. This project implements the strategy of pumping groundwater from areas of the aquifer readily recharged and reducing pumping in areas of the aquifer that are more difficult to recharge. In addition to offsetting existing potable water demands with recycled water supplies, this is accomplished by supplying in-lieu and injected recharge to the Pleasant Valley basin and south Oxnard Plain areas where it is needed most. A similar amount of water would be pumped from the Oxnard Plain Forebay basin. This strategy moves a considerable amount of extractions from areas that are overpumped to the easily-recharged Oxnard Plain Forebay basin.

Because M&I non-potable and agricultural demand is lower in the winter and recycled water cannot be effectively utilized during that time, a direct recharge component is necessary to accommodate the winter quantities of recycled water. A configuration of injection wells along Highway 1 and Hueneme Road was examined using the Ventura Regional Groundwater Model; this conceptual configuration is discussed in the EIR for the GREAT Project (City of Oxnard, 2005). Injecting water during only a portion of the year is less effective than with full-time injection; the addition of supplemental waters to use for injection is discussed as another strategy of this management plan.

Two FCGMA policy issues need to be addressed relative to the GREAT project. The FCGMA has allowed a one-for-one earning of storage credits – one acre-foot of stored water equals one acre-foot of storage credits – that has been applied to such projects as Calleguas MWD's Las Posas ASR project. When water is injected into a groundwater barrier to contain saline intrusion, however, some of the injected water will likely be tainted by the saline waters. The policy question then becomes whether the entire injected water should earn one-for-one storage credits; this is largely a policy decision rather than a technical decision.

The other FCGMA policy issue relates to pumping the storage credits from the Oxnard Plain Forebay basin. Moving the location of pumping to the Forebay is beneficial to the Pleasant Valley and Oxnard Plain basins, providing that the added pumping stress in the Forebay can be accommodated. For other strategies that involve pumping in the Forebay (e.g., Saticoy Wellfield, Supplemental M&I Water Program), there is a caveat that pumping not occur when groundwater levels have dropped below a threshold that applies to the use of water from the Freeman Diversion as a grant condition from the State Water Resources Control Board (available Forebay storage of 80,000 AF, using two index wells). Such a caveat is also appropriate for the GREAT project. The City of Oxnard can accommodate such an operational requirement by shifting its pumping to wells in the Oxnard Plain just outside of the Forebay when groundwater levels are low in the Forebay. The FCGMA should implement a general policy for all projects that shift pumping from overdrafted areas to the Forebay.

In addition, there are water quality concerns with injection of recycled water. The GREAT project will be performing a Title 22 analysis to permit this injection, which is administered by the Los Angeles Regional Water Quality Control Board with input from the California Department of Health Services. Water quality monitoring will be required by the permit; the FCGMA should review any proposed monitoring and comment to the Regional Board as needed.

9.1.2 Potential Effectiveness

This planned GREAT project would implement one of the strategies likely to be successful in restoring groundwater levels in the Pleasant Valley and Oxnard Plain basins. As part of the EIR for this project, the Regional Groundwater Model was used to test the effects of the project. The project was tested both at the lower initial yield and at full implementation. The effectiveness of the project must be judged by balancing raising Lower Aquifer System water levels in the Pleasant Valley basin and south Oxnard Plain areas against lowering water levels in the Oxnard Plain Forebay basin. The groundwater model indicated water levels in the LAS beneath the southern Oxnard Plain basin and the Pleasant Valley basin would rise by as much as 70 feet, whereas UAS water levels in the Forebay basin would only drop by about 5 feet during wet periods and 20 feet during dry periods. Thus, the project will have to carefully balance the positive and negative effects on water levels. Potential mitigation of lowered water levels in the Forebay include inducing more recharge from existing facilities and from potential increased diversion rights at the Freeman Diversion. The results of the groundwater modeling suggest that BMOs for groundwater levels would be met 51% of the time in the Upper Aquifer (compared to 51% with current management strategies) and 36% of the time in the Lower Aquifer (compared to 5% with current management strategies) with full construction of the GREAT project.

If current recharge is reduced in the Forebay because of required fish flows or other reasons, then the Forebay basin may not be able to accommodate increased pumping, particularly in dryer periods. The City of Oxnard will conduct a monitoring program as part of the GREAT project to measure effects of the project. It would be prudent for the FCGMA to have a written agreement on operation of the GREAT project to ensure long-term operation of the project would continue to meet Agency strategies.

9.2 SOUTH LAS POSAS BASIN PUMP/TREAT

This management strategy is ranked high because it is in a mature stage of design and the problem that it aims to help solve is an ongoing problem for the Las Posas basin that needs a rapid solution to prevent further water quality degradation.

9.2.1 Description

As discussed in section 5.1.3 *High Salinity Associated with High Groundwater Levels*, high groundwater levels in the South Las Posas basin have apparently dissolved salts from the unsaturated portions of the shallow aquifer and created a mound of water more saline than ambient groundwater. One potential mitigation measure would be to pump the saline groundwater from the shallow aquifer, creating space in the aquifer thus allowing less-saline winter storm water to percolate into the aquifer. Under the current conditions, the majority of these winter flows now bypass the recharge areas because there is no available storage in the shallow aquifer. If implemented, this strategy would involve the pumped saline water being blended with low-chloride water and/or desalinated before delivery to customers.

Ventura County Waterworks Districts #1 (Moorpark) and #19 (Somis) are working with the Calleguas MWD to design and fund such a pilot project in the South Las Posas basin. The pumping associated with such a project would be in excess of current FCGMA allocations and would require approval of the FCGMA Board prior to implementation. Under FCGMA Resolution 2003-03, the Board indicated that upon its review and approval, it may change or alter an allocation for pumping from the South Las Posas basin to accommodate a responsible entity that submits a plan to render this groundwater usable. A general FCGMA policy for these types of projects in the future is discussed in section 11.3 *Recommended Additions to FCGMA Policies.*

9.2.2 Potential Effectiveness

The effectiveness of this particular strategy can be evaluated using two criteria. The first is the overall reduction in salts in the South Las Posas basin because higher-salinity groundwater is extracted and treated, removing salts from the system. The improvement in water quality in the basin would depend upon the amount of groundwater extracted and the amount of water recharged versus the ability of the aquifer or other sources to contribute additional dissolved salts. Another measurement of effectiveness would be the efficacy of drawing down the shallow groundwater to create space for recharge of better quality rain water. Greater drawdown could create conditions more favorable to recharge thus allowing more “fresh water” into the basin. It could also create space for addition salt-impacted waters. Thus, there are several factors that control the effectiveness of removing salts by pumping and treating the groundwater.

It is not possible at this time to adequately combine the factors to determine overall potential changes in water quality, although it is likely that dissolved salts removed during extraction and treatment would remove at least a portion of the salt load in the basin. Further analysis of nature and extent of the of the salts, quantification of the salt inputs (for example, mass balance), and evaluation of potential removal efficacy may be necessary to estimate the potential success of this strategy.

9.3 DEVELOPMENT OF BRACKISH GROUNDWATER, PLEASANT VALLEY BASIN

This strategy is also highly ranked because it can be implemented relatively quickly, may prevent water quality degradation in the northern Pleasant Valley basin, and would reduce pumping in the middle of the largest pumping depression in the Pleasant Valley basin.

9.3.1 Description

There are additional areas along Calleguas Creek besides the South Las Posas basin where groundwater has elevated salinity. Base flow from the Arroyo Las Posas has migrated completely across the South and East Las Posas basins and into the northernmost Pleasant Valley basin, providing a source of recharge to this portion of the Pleasant Valley basin. However, this recharge water has created water quality problems for groundwater pumpers. There are additional areas along Calleguas Creek besides the South Las Posas basin where groundwater has elevated salinity. Base flow from the Arroyo Las Posas has migrated completely across the South and East Las Posas basins and into the northernmost Pleasant Valley basin, providing a source of recharge to this portion of the Pleasant Valley basin. However, this recharge water has created water quality problems for groundwater pumpers. City of Camarillo wells in this area have experienced increased salts as groundwater levels have risen over the last decade (Figure 21), similar to the condition described in section 9.2 *South Las Posas Basin Pump/Treat*.

It is not yet clear if this recharge water from the Arroyo Las Posas will create a mound of poorer-quality groundwater that would move out into the main portion of the Pleasant Valley basin under recharge conditions. This would depend upon how well-connected the recharge area is to the main portion of the LAS in the Pleasant Valley basin. The City of Camarillo is considering a strategy to move some of its current pumping from the area of the LAS pumping depression in the central portion of the Pleasant Valley basin to the northern portion of the basin where rise in poorer-quality groundwater is being observed. Under this plan, the poorer-quality water would be extracted and desalinated in a similar manner to the South Las Posas basin project.

The City of Camarillo has assessed the feasibility of constructing a Groundwater Treatment Facility that would be located in the Somis Gap area of the Pleasant Valley Basin (Black and Veatch, 2005). The study determined the project to be technically feasible and would allow Camarillo to halt pumping from an area of the LAS with depressed groundwater levels and instead pump in an area of rising groundwater levels.

Camrosa Water District is considering another type of project that potentially develops the use of brackish groundwater. In an area of the eastern portion of the Pleasant Valley basin near California State University, Channel Islands along Calleguas Creek, Camrosa has been studying the possibility of extracting poor-quality Upper Aquifer(?) water, treating it, and putting it in their delivery system. This water, some of which was used historically, has risen to relatively high levels. Water quality monitoring in the adjacent main portion of the Pleasant Valley basin indicates that this poorer-quality water may not be migrating into the Lower Aquifer of the Pleasant Valley basin. Thus, there is the possibility this water could be pumped without lessening the supply to the Pleasant Valley basin. Some of this area is outside the FCGMA boundary.

Previously, both the potential Camarillo and Camrosa projects would have to be pumped using existing allocations if the well was within the FCGMA boundary. However, as FCGMA policy has evolved over time, pumping of poorer quality groundwater without an allocation has been evaluated on a case-by-case basis. A coordinated effort between the FCGMA and proponents of such projects in the Pleasant Valley basin should be undertaken to determine whether these projects are within this policy. Also, a feasibility analysis of these projects may be necessary to determine the potential net effects to the area and evaluate whether additional pumping would improve or degrade current water quality conditions. This FCGMA policy issue is discussed in more detail in Section 11.3 *Recommended Additions to FCGMA Policies.*

9.3.2 Potential Effectiveness

Pumping and removing salts from groundwater is an effective means of reducing the salt load in a watershed. If the areas from which the salts are removed are hydrologically connected to the main portions of the groundwater basins within the FCGMA, then this removal of salts could also have a positive impact. If the pumping of this poorer-quality groundwater does not affect the main groundwater basins, then these projects would have a neutral effect on the main groundwater basins while increasing the supply of available water. However, if these projects reduce the recharge to the FCGMA groundwater basins without also providing a significant benefit to water quality in these basins, than the projects could have a negative impact on the groundwater basins within the Agency. Any such projects would require monitoring of both water levels and water quality to determine their effect on adjacent areas of the basin.

The potential City of Camarillo project also has an element of moving existing pumping from the area of the Pleasant Valley basin near the Camarillo airport, which has the most-depressed groundwater levels, to an area more favorable for recharge along Arroyo Las Posas. The portion of the potential project related to the pumping reduction was tested using the Ventura Regional Groundwater Model (see Appendix B). Model results indicate that the worst portion of the pumping depression would be decreased considerably in size, leaving a smaller depression in the southern Pleasant Valley basin. The other element of the project, increasing pumping along the Arroyo Las Posas, cannot yet be tested effectively with the model. The model does not now capture the hydrogeology of the northernmost portion of the Pleasant Valley basin – a recharge area of the basin near Somis that is now apparent from monitoring data needs to be better understood and integrated into the model.

9.4 NON-EXPORT OF FCGMA WATER

This strategy is important in preventing additional un-authorized pumping within FCGMA basins, where additional strategies are required to mitigate current pumping. The strategy can also be implemented rather rapidly through FCGMA actions.

9.4.1 Description

Current policies and ordinances limit the use of groundwater produced from within the FCGMA to only those areas within the boundaries of the Agency with only rare exceptions. In 1997, original or prior historical uses outside the FCGMA boundary that were not known in 1985 were allowed through grandfathering of these uses. Since 1997, however, recent aerial photo analysis of new developments and additional crops grown near the FCGMA boundary indicate that there is a "fringe" of crops or additional lands being irrigated outside the boundary that are apparently being irrigated by groundwater produced from within the FCGMA. In most cases, these crops are contiguous across the FCGMA boundary from inside the boundary to outside the boundary; in some cases, the crops are grown on a parcel that spans the boundary. Some of these crops may have been planted in earlier years, but air photo analyses indicate that a portion of the crops have been planted in the last several years.

When the FCGMA was formed, it was envisioned that some undeveloped acreage within the FCGMA would be developed in the future and would create a new water use. A baseline allocation of one acre-feet per acre of water was to be allocated to any newly-developed lands. However, this baseline allocation was only for land within the FCGMA boundaries. If groundwater produced from inside the FCGMA boundaries was used on adjacent hillsides outside of the FCGMA boundary, this new irrigation would provide considerable extra draft on

the groundwater basins. This additional draft on the aquifers is counter to all the FCGMA policies aimed at reducing pumping in the overdrafted aquifers.

Preventing this additional draft on the aquifers is clearly a high priority of this management plan. It appears that current ordinances and policies of the FCGMA may be sufficient to deal with its export issue, but this should be reviewed. What is needed is a regular procedure to both educate pumpers of the export policy and to identify areas where this policy has been violated. It is recommended that the FCGMA developed such a procedure and determine how to address past and current violations of this policy.

9.4.2 Potential Effectiveness

Preventing additional draft on the groundwater basins of the FCGMA is equivalent in effectiveness to pumping reductions. Many of the areas where water is exported across the FCGMA boundary are adjacent to the Pleasant Valley and Las Posas basins where lowered groundwater levels are particularly apparent. Therefore, much of this additional draft on the groundwater basins is occurring in the areas of the aquifer that can least sustain them. This fact increases the effectiveness of preventing these water exports.

9.5 CONTINUATION OF 25% PUMPING REDUCTION

This strategy is already in place, but is being reviewed by the FCGMA Board.

9.5.1 Description

Current FCGMA management strategies include the 25% reduction in pumping allocation that was called for in the original management plan. This management strategy is to continue the planned reductions as they were originality intended -- the planned reduction to 20% of allocation occurring during 2007 (delayed from 2005) and the 25% reduction occurring according to the 2010 schedule. These reductions were to stay in force until the FCGMA basins are no longer in overdraft and there is sufficient water for recharge to compensate for the increased pumping created when the restrictions are removed.

9.5.2 Potential Effectiveness

The original 25% pumping reduction has had the effect of reducing both M&I pumping and agricultural pumping (see section 8.3 *Effectiveness To-Date of Current Management Strategies*). The effect of continuing the phased reductions to the full 25% reduction was modeled using the Ventura Regional Groundwater Model. This model scenario assumed that pumping reductions beyond the current 15% reduction were applied only to M&I pumping; it was assumed that any agricultural wells currently using their reduced pumping allocation for FCGMA reporting would simply shift to an efficiency calculation, rather than further reduce pumping. The results of the modeling suggest that these additional pumping reductions, which amount to 3,800 acre-feet per year throughout the FCGMA, would raise groundwater levels in the Upper Aquifer System by a little over one foot at the Port Hueneme coastline and raise Lower Aquifer System groundwater levels by an average of a little over two feet. BMOs for groundwater levels would be met 53% of the time in the Upper Aquifer (compared to 51% with current management strategies) and 7% of the time in the Lower Aquifer (compared to 5% with current management strategies).

9.6 RIVERPARK RECHARGE PITS

This strategy is being implemented through a Joint Powers Agreement between the City of Oxnard and United Water Conservation District.

9.6.1 Description

Decades of relatively unrestricted deep gravel mining beginning in the 1950s created a series of large open pits (formerly owned by S.P. Milling) along the Santa Clara River within the Oxnard Plain Forebay basin that are now unused and expose groundwater in the pits to evaporation and potential contamination. As part of an agreement between the City of Oxnard, a developer (RiverPark), the FCGMA, County of Ventura, and UWCD, these pits are being stabilized and urban surface drainage is being diverted away from the pits. If all the work on the pits is accomplished appropriately, the plan is to have UWCD operate the pits as a recharge and storage facility. UWCD would build a water conveyance system that would allow flood flows diverted at the Freeman Diversion to be transported to the RiverPark pits for recharge. These facilities would allow increased diversions of the Santa Clara River; silt-laden river water could be diverted and recharged, water that now must be bypassed and which flows to the ocean following large rainstorms.

Use of the RiverPark pits serves two purposes for the aquifer. First, the facilities will allow additional recharge to the aquifers from silty water that is now bypassed at the Freeman Diversion. Second, the project moves a portion of the Forebay recharge further down-gradient in the basin, away from the recharge mound that forms in the upgradient portions of the Forebay basin beneath the UWCD Saticoy Spreading Grounds. Thus, more recharge water will infiltrate into the Forebay during wet years, a time when a recharge mound builds in the upgradient portion of the basin and reduces recharge rates in existing spreading facilities. No FCGMA policy changes would be required to implement this project.

9.6.2 Potential Effectiveness

UWCD has analyzed the effectiveness of the RiverPark recharge project by combining UWCD's surface water model with the Ventura Regional Groundwater Model. This modeling suggests the yield of the project could be as much as 4,000 AFY (combined with a higher diversion rate at the Freeman Diversion), with the annual yield ranging from 400 AF in dry years to 11,500 AF in wet years. This additional recharge in the Forebay will raise water levels in the basin, which helps pressurize the greater Oxnard Plain. In addition, higher water levels in the Forebay basin will help mitigate the effects of other projects described in this management plan that rely on increased pumping in the Forebay.

The results of the groundwater modeling suggest that BMOs for groundwater levels would be met 52% of the time in the Upper Aquifer (compared to 51% with current management strategies) and 6% of the time in the Lower Aquifer (compared to 5% with current management strategies).

10.0 POTENTIAL FUTURE MANAGEMENT STRATEGIES

Groundwater modeling indicates that additional management strategies are required to eliminate overdraft in both Upper Aquifer and Lower Aquifer System aquifers and to prevent further seawater intrusion along the coastline and saline intrusion in more inland areas. A variety of potential future strategies are ranked below, with those that are the most effective and

can be implemented the soonest discussed first. Because of the large number of strategies, they are separated into those that can be implemented within 5 years, 10 years, 15 years, and greater than 15 years.

10.1 5-YEAR STRATEGIES

The following strategies that can be implemented within five years are ranked by order of effectiveness and/or importance.

10.1.1 5-Year Update of FCGMA Management Plan

10.1.1.1 <u>Description</u>

It is recommended that this Plan be updated every five years. This update should include a status of how the BMOs are being met, effectiveness of strategies that have been implemented, status of other recommended strategies, and recommendations for any additional management strategies.

10.1.1.2 <u>Potential Effectiveness</u>

Updating the Plan every five years will be an effective milestone for the FCGMA to evaluate and re-evaluate its course of action. This will keep the FCGMA's goals and its successes and failures front and center where they belong.

10.1.2 A Plan To Shift Some Pumping Back to Upper Aquifer System

10.1.2.1 <u>Description</u>

One of the initial groundwater management strategies for the FCGMA was to shift pumping to the Lower Aquifer System from the Upper Aquifer System to relieve pumping stresses that created a pumping trough in the UAS on the Oxnard Plain basin. This was accomplished by requiring new and replacement wells to be drilled in the LAS. Now that it is clear that the LAS cannot accommodate all this new pumping, it would be prudent to move some of the LAS pumping back to the UAS. However, this must be done very carefully to prevent a shift that would again create problems in the UAS.

A shift in pumping back to the UAS has already been initiated through County well permitting requirements. However, this shift cannot be uniformly enforced across the basins within the FCGMA. A detailed plan must be formulated that takes into account local recharge sources, hydrologic connection between portions of the basin, and current/future in-lieu recharge projects. This should be accomplished through use of the Ventura Regional Groundwater Model in fine-tuning the details of this plan, with the FCGMA, VCWPD, and UWCD working together.

10.1.2.2 <u>Potential Effectiveness</u>

By shifting pumping from the LAS to the UAS in areas where the Lower Aquifer System is not readily recharged could substantially raise groundwater levels in critical areas of the basins. This strategy only works, however, if the increased UAS pumping can be accommodated by the shift in pumping. For this reason, a sophisticated tool such as the Ventura Regional Groundwater Model is required to predict where and how much pumping should be shifted.

For an indication of how this strategy might work, 5,000 AFY of Lower Aquifer pumping was moved to the Upper Aquifer in the triangular area of the south Oxnard Plain from the Port

Hueneme zone of low conductance (fault?) to the western edge of the Pleasant Valley basin. The results of the groundwater modeling suggest that BMOs for groundwater levels would be met 50% of the time in the Upper Aquifer (compared to 51% with current management strategies) and 9% of the time in the Lower Aquifer (compared to 5% with current management strategies) – raising Lower Aquifer water levels at BMO wells an average of 8 feet (Table 8).

10.1.3 Protect Current Sources of Recharge

10.1.3.1 ***Description***

Protecting current sources of recharge to the FCGMA basins is particularly important as we face additional groundwater management problems. Maintaining Santa Clara River flows and water quality has been a focus for Ventura County over the past decade. The County of Ventura and UWCD went to court in the late 1990s to ensure that increasing land development and water use in the Santa Clarita area of Los Angeles County did not jeopardize Santa Clara River flows across the County line into Ventura County. More recently, local water agencies and especially the farming community have expressed concerned about rising chlorides from waste water discharges coming from Los Angeles County. It is very important to the FCGMA to continue to protect this important source of groundwater recharge through support of local agencies who deal directly with these issues.

On Calleguas Creek, where a portion of the flow originates from discharges produced by wastewater treatment plants, downstream users have come to rely on the increased flows in the Creek for recharge. Agreements on wastewater discharges flowing down Arroyo Santa Rosa resulted in the Conejo Creek project. Similar flows along the Arroyo Las Posas provide recharge to the Las Posas basins and the northern Pleasant Valley basin. The Arroyo Las Posas flows are augmented by discharges from the Simi Valley and Moorpark wastewater treatment plants and from dewatering of shallow groundwater in western Simi Valley. Similar to the Santa Clara River, maintenance of these flows is necessary to recharge the downstream groundwater basins. As such, the quantitative effects of shallow groundwater extraction in the Las Posas and northern Pleasant Valley Basins may need to be evaluated for the potential impacts to downstream surface water flows.

10.1.3.2 ***Potential Effectiveness***

The current sources of recharge to the groundwater basins within the FCGMA are essential not only in maintaining current management strategies but also in implementing future strategies. Without protecting current recharge sources, the overdraft within the FCGMA could increase and negate some of the benefits realized by projects and strategies that have been very successful to date. Therefore, this strategy is one of the most effective in reducing overdraft, and is an essential FCGMA strategy.

10.1.4 Limitation on Nitrate Sources in Portions of the Oxnard Plain Forebay Basin

10.1.4.1 ***Description***

High nitrate concentrations are present in groundwater in portions of the Oxnard Plain Forebay basin (see section 5.1.4 *Nitrate in Groundwater*). The source of a portion of this nitrate is from fertilizer use on overlying crops. A thick vadose zone (unsaturated zone) between the crops and the groundwater table allows natural processes to degrade some of the nitrate before it percolates with irrigation waters down to groundwater. Gravel pits within the Forebay were generally mined to five feet above historic groundwater levels, with reclamation plan restrictions

on growing high-nitrate use crops within the mined pits where the vadose zone is so limited. As reclamation is completed, however, there are no longer crop restrictions. Thus, high-nitrate crops could be grown in these former gravel basins with a limited vadose zone.

The FCGMA should take a leading role in preventing further nitrate contamination in the Forebay. The FCGMA should work with land use planners and the Regional Water Quality Control Board to ensure that high-nitrate crops are not grown in areas with a limited vadose zone caused by gravel mining.

10.1.4.2 ***Potential Effectiveness***

Limiting sources of nitrate is the most effective method of reducing nitrate in groundwater. Because nitrate is a primary drinking water contaminant that can cause serious adverse health effects and because the Forebay is a primary source of drinking water for consumers across the Oxnard Plain, limiting sources of nitrate should be a high priority for the FCGMA.

10.1.5 Policy on Recovery of Credits from Oxnard Plain Forebay Basin

10.1.5.1 ***Description***

There are several management strategies that involve increased pumping in the Oxnard Plain Forebay basin to either supply water to overdrafted areas (e.g., Saticoy Wellfield) or to recover FCGMA credits earned by reducing pumping in overdrafted areas (e.g., Supplemental M&I Water Program, GREAT project). Using the Forebay in such a manner is definitely beneficial to both the Pleasant Valley and Oxnard Plain basins – however, it must be done in a manner such that the added pumping stress in the Forebay can be accommodated. For the Saticoy Wellfield and the Supplemental M&I Program, there is a caveat that pumping not occur when groundwater levels have dropped below a certain threshold. This threshold is the same as the grant condition applied to the use of water from the Freeman Diversion by the State Water Resources Control Board – that there is no more than 80,000 AF of available storage in the Forebay. In practice, this means that the average of combined groundwater levels of two index wells in the Forebay be above a certain level.

To assure a uniform policy, the FCGMA should implement a general policy for all projects that use FCGMA credits to shift pumping from overdrafted areas to the Forebay. It is recommended that this policy follow the State Board criteria discussed above and delineated in Table 9, or equivalent criteria if these wells are not available in the future. In addition, pumping using these credits should not adversely impact other pumpers in the basin. How these adverse impacts are defined will depend upon the specifics of each project and will have to be detailed when individual projects are approved by the FCGMA. It is also recommended that the FCGMA establish a policy for prioritizing the types of projects that can use transferred credits to pump in the Forebay. This will be especially important if there is more demand for these transfer projects than the Forebay can accommodate.

Wells Used	***Groundwater Elevations***
2N/22W-12R1 ***2N/22W-22R1***	>17 ft above msl for combined groundwater elevations

Table 9. Criteria for using Credits for extraction in the Oxnard Plain Forebay basin.

10.1.5.2 ***Potential Effectiveness***

Shifting pumping from an impacted area to the Forebay through the use of FCGMA credits is a very effective strategy, providing that this pumping doesn't adversely impact the Forebay. Using the criteria outlined in the previous paragraph, Forebay impacts can be avoided or mitigated.

10.1.6 Verification of Extraction Reporting

10.1.6.1 ***Description***

Meters are required to be installed on all but domestic wells by Chapter 3 of Ordinance 8, although not all pumpers have installed meters or use their meters for reporting extractions. In addition, all extractions are self-reported and the accuracy of FCGMA extraction records relies on correct self-reporting. To ensure the accuracy of extraction records, which are used by the FCGMA and others to determine the changing pumping stress on the aquifers in the FCGMA, it is recommended that the FCGMA make periodic random checks on a small number of meters annually to ensure that meters are correctly installed and that the extractions reported by pumpers to the FCGMA correctly reflect actual meter readings.

10.1.6.2 ***Potential Effectiveness***

The accuracy of FCGMA reporting records is important for extraction trends, determination of credits and efficiency, and overall compliance with pumping reductions. It is essential that all pumpers believe that everyone is "playing by the rules" and a verification procedure could help ensure that pumpers continue to believe that everyone is in this together.

10.1.7 Separate Management Strategies for Some Basins

10.1.7.1 ***Description***

The initial FCGMA Management Plan treated all the FCGMA basins the same in that the same rules applied to all basins. We now know more about how these basins are interconnected and whether some of the basins have unique circumstances. For example, we know that the East Las Posas basin is largely hydraulically disconnected from both the West Las Posas basin and the northern Pleasant Valley basin. However, these basins also share some common elements; for instance, the East Las Posas basin and northern Pleasant Valley basin share a common recharge source, the Arroyo Las Posas. One element common to all the FCGMA basins is that they are overdrafted. Current FCGMA management strategies such as pumping reductions are thus appropriate to all the basins.

The FCGMA has considered localized management strategies. In the South Las Posas basin, for instance, a project to pump and treat poor-quality water without an allocation has been considered by the FCGMA Board. The strategy of moving pumping away from coastal areas applies largely to the Oxnard plain basin.

New strategies in this Management Plan are also applied to specific situations in each basin. The Management Plan for the East Las Posas basin, included as Appendix C, addresses issues specific to the operation of Calleguas' ASR project. This plan is adopted as part of the overall FCGMA Management Plan and the FCGMA Board will consider how its elements will be integrated into FCGMA ordinances. Likewise, the strategies for potentially pumping shallow groundwater along Calleguas Creek are also specific to the Pleasant Valley basin. The basin management objectives of this plan are also specific to each basin.

The FCGMA-wide strategy of pumping reductions across all FCGMA basins engenders the most discussion of whether this is appropriate in all cases. As discussed in section 9.5 *Continuation of 25% Pumping Reduction*, these reductions are appropriate across all FCGMA basins as long as there is overdraft in all basins. It would be appropriate, however, to re-evaluate any future additional pumping reductions by examining each basin separately.

10.1.7.2 ***Potential Effectiveness***

The current strategy of allowing specific policies to address individual basin problems is the most effective means of addressing the overdraft and water quality problems within the FCGMA.

10.1.8 FCGMA Boundary

10.1.8.1 ***Description***

The FCGMA boundary is defined as the outer edge of Fox Canyon Aquifer. In most areas, this outer edge is either the outcrop of the Fox Canyon Aquifer (such as along the north and east flanks of the Las Posas basin) or is the point where the Fox Canyon Aquifer onlaps older rocks (such as along the east side of the Pleasant Valley basin). However, along the western boundary of the FCGMA, it is defined as the western edge of the Oxnard Plain Forebay and Oxnard Plain basins (west of which the Fox Canyon Aquifer is not identified). Thus, this western boundary is also the boundary between the Oxnard Plain and Mound basins or the Oxnard Plain Forebay and Santa Paula basins.

Recent work done as part of the Santa Paula Basin Stipulated Judgment has moved the southern boundary of the Santa Paula basin farther north to coincide with the current known location of the Oak Ridge fault. This boundary of the Santa Paula basin was agreed to by experts working for the parties in the Santa Paula Basin Stipulated Judgment, including UWCD, the city of San Buenaventura, and the Santa Paula Basin Pumpers Association. In addition, UWCD groundwater staff have carefully monitored groundwater elevations in wells on both sides of this Santa Paula basin boundary and have confirmed that groundwater elevations south of the adjudicated basin boundary respond to recharge operations in the Oxnard Plain Forebay basin, whereas groundwater elevations to the north of the boundary do not. In addition, there is a significant discontinuity in groundwater elevations from one side of this boundary to the other.

The practical effect of this change in the Santa Paula basin boundary is that there is now a small region between the old and new boundary of the Santa Paula basin (Figure 28) that is not managed under either the Santa Paula Basin Stipulated Judgment or FCGMA rules and regulations. Because this area is in hydrologic continuity with the remainder of the Oxnard Plain Forebay basin, it would be appropriate to move the FCGMA boundary slightly north and east to coincide with the reinterpreted boundary of the Santa Paula basin and to reflect the reality of the continuity of this area with the Oxnard Plain Forebay basin. It is recommended that the FCGMA consider making this boundary change based on the technical information available.

10.1.8.2 ***Potential Effectiveness***

By allowing a strip of land to be unmanaged through either the Santa Paula Stipulated Judgment or the FCGMA, it is possible to site wells on this strip of land and directly benefit from the significant recharge that takes place in the Oxnard Plain Forebay basin, meanwhile adversely affecting downgradient portions of the aquifers that rely on this recharge to repel seawater intrusion. By bringing this area into the FCGMA, wells sited in a strip of land will appropriately be subject to FCGMA extraction allocations and other management strategies. If the land described here is not brought into the FCGMA, it could invite unmanaged pumping that would adversely affect the basins within the FCGMA.

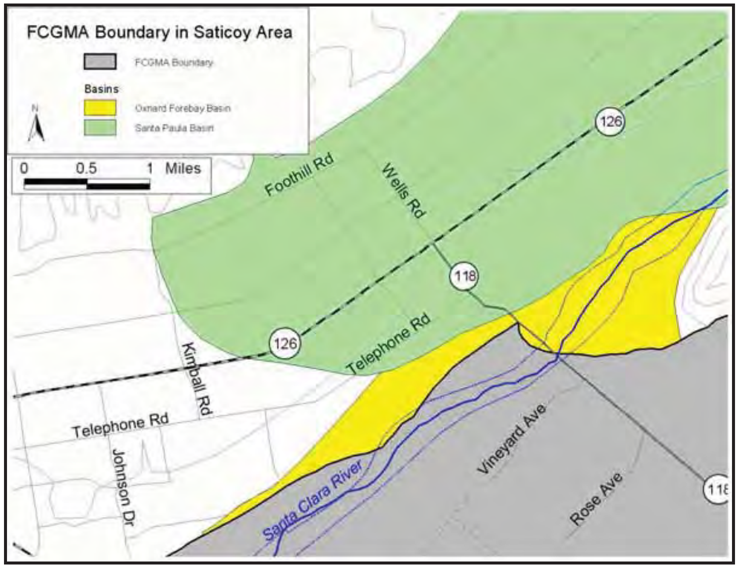


Figure 28. Area southeast of Santa Paula basin where FCGMA boundary is not coincident with current basin boundaries. The yellow area represents the portion of the Oxnard Forebay basin which is currently outside of the FCGMA.

10.1.9 Irrigation Efficiency Calculations

10.1.9.1 Description

Current FCGMA policies allow agricultural pumpers to meet a crop efficiency standard for their irrigation as an alternative to the Historical or Baseline allocation and credit program. This option is called the Irrigation Efficiency allocation. FCGMA efficiency calculations are based on daily information from a set of weather information gathering stations maintained across the FCGMA. Water demand for an index crop (cool season grass) is calculated daily. A crop factor is then applied to this index water demand to adjust the required water demand downward for four major categories of crops grown within the FCGMA. The final step in calculating crop irrigation efficiency is to adjust for 80% irrigation efficiency by taking the annual allowed water demand for each of the four major crop types and allowing an extra 20% water use for salt leaching and irrigation-system inefficiencies. The Irrigation Efficiency allocation was intentionally designed to make it possible for growers to sustain profitable agriculture within the FCGMA, but at the same time raise awareness of water conservation. The FCGMA should review the effectiveness of the efficiency allocation periodically to ensure that it being equitably applied.

In practice, Irrigation Efficiencies that pumpers report to the FCGMA are as a rule quite high – 100% to as much as 300% (water use as little as one third of estimated demand). This

suggests the method of calculating Irrigation Efficiency may not be appropriate. Improving the method would not affect the vast majority of pumpers who now report high efficiencies. However, it may identify any pumpers who are not using irrigation water efficiently by making it more difficult for them to reach the minimum required efficiency. It is recommended that the FCGMA Board consider a strategy to examine the method of calculating Irrigation Efficiency. Topics to consider might include adjusting crop demand for more specific crops, re-examining the 80% efficiency requirement, and ensuring that acreages reported be actual irrigated acreage rather than total owned acreage.

10.1.9.2 Potential Effectiveness

It is not clear exactly what amount of reduction in agricultural pumping would occur by adjusting the Irrigation Efficiency calculation. As documented elsewhere in this Management Plan, agricultural pumping reported to the FCGMA has been reduced by as much as 30% since the FCGMA pumping restrictions were initiated. Thus, most agricultural pumpers have apparently increased their irrigation efficiency substantially over the last 15 years. As discussed above, the vast majority of those efficient pumpers are unlikely to be affected by any changes in the Irrigation Efficiency calculation. However, changes in the efficiency calculation might affect those pumpers who have not already improved their irrigation efficiency.

10.1.10 Additional Storage Projects in Overdrafted Basins

10.1.10.1 Description

Aquifer Storage and Recovery (ASR) projects, such as the Las Posas Basin ASR project, provide benefits to an overdrafted basin because water stored in the basin raises groundwater levels above what they would be without the project. The water is not permanently devoted to the basin, but is removed from time to time, generally during periods of water shortage in droughts or emergencies. In practice, the water generally remains in storage for multiple years and is not completely removed during extraction periods. Thus, there is a long-term benefit to the basin. Such projects need to be carefully designed so that neither recharge nor recovery adversely affects other users in the basin. The recovery periods generally cause a significant decline in water levels in the vicinity of the ASR wellfield, especially if the ASR is operated in a confined aquifer setting.

ASR projects are most effective in areas where groundwater levels have been substantially lowered by overdrafting and where the physical properties of the in-situ geologic formation are amenable to both efficient injection and efficient extraction. Within the FCGMA, the Pleasant Valley and south Oxnard Plain areas are both candidates for ASR projects under current conditions because groundwater elevations are continuously below sea level due to overpumping and the geologic formations in these areas have relatively high permeability and transmissivity (e.g., Densmore, 1996; Hanson et al., 2003). To make this strategy effective, saline intrusion currently evident in the south Oxnard Plain would need to be hydrologically isolated from any ASR project to protect the stored water from degradation and to prevent additional intrusion of saline waters during extraction of the stored water. An ASR project could potentially be paired with a barrier well project (discussed in section 10.3.1 *Barrier Wells in South Oxnard Plain*).

The available storage space in the Pleasant Valley and southern Oxnard Plain basins has not been rigorously calculated. The amount of water that has been extracted from coastal areas in excess of recharge has been calculate as about one million acre-feet since the 1950s (UWCD, 2006), with permanent loss of aquifer storage capability from resulting subsidence of about 200,000 AF. The remaining 800,000 AF of potential storage space in the aquifer has been partially refilled by intruded seawater, but there remains a large amount of potential aquifer storage space available.

10.1.10.2 ***Potential Effectiveness***

Storage projects can be effective in restoring groundwater levels in overdrafted basins. However, the restoration only occurs during the period when water is stored in the basin. For many storage projects, the period of storage can be many years and not all the stored water may be removed during the extraction phase of the project – in that case, there is a long-term positive effect on the basin.

There are two issues that must be addressed with any storage project to ensure that the project does not adversely impact a basin: 1) the storage project must not interfere with recharge to the basin by creating groundwater levels so high that there is rejected natural and artificial recharge; and 2) extraction of stored water must not adversely affect the basin and other pumpers by pulling in poor-quality water, dewatering clays and creating subsidence, or creating large cones of depression around project extraction wells that prevent nearby pumpers from using their wells efficiently. Mitigation of such potential impacts may be feasible. Higher groundwater levels from storage projects may also mask continuing overdraft in a basin, so it is essential to continually determine what the basin condition would be without the storage project. Such safeguards are part of the East Las Posas Basin Management Plan (Appendix C) with regards to the Las Posas Basin ASR project.

10.1.11 Penalties Used to Purchase Replacement Water

10.1.11.1 ***Description***

The FCGMA charges a penalty to pumpers for extracting more water than is allowed under the various allocations (Historical, Baseline, Irrigation Efficiency). Up to 2006, this has not generated significant revenue because few pumpers have exceeded their allocation. There may be circumstances in the future, however, where this may not be true. The increased groundwater use caused by the over-pumping could be offset by using the fees generated by penalties to purchase replacement water for the extracted groundwater. This is a strategy used by the Orange County Water District, where the penalty is called a Basin Assessment Fee. The FCGMA has several options to obtain additional water, including purchasing unused portions of Ventura County's State Water Allocation, paying M&I users to increase their imported/groundwater blend, and purchase of water through a variety of programs from the State or others such as turn-back pool water, Dry-Year Purchase Program, and other programs. This water could be delivered through either conveyance down the Santa Clara River or Calleguas MWD's pipeline, depending upon how the water was purchased and used.

10.1.11.2 ***Potential Effectiveness***

A FCGMA policy to purchase water to replace over-pumped groundwater would have a direct effect on the aquifers. If the replacement was done judiciously, more water could be purchased than was originally pumped and/or the water could be used for recharge particularly stressed areas such as the southern Oxnard Plain basin or the Pleasant Valley basin. Thus, the replacement water could actually improve groundwater conditions.

10.1.12 Additional Water Conservation

10.1.12.1 ***Description***

There is a growing move to require the use of recycled water to replace non-potable uses in new developments in California. The FCGMA could encourage local cities and other planning agencies to require a dual plumbing system (where it meets plumbing code) in new developments where it is practical to deliver recycled water of suitable quality. The FCGMA could make this policy known to the permitting agencies through both a resolution sent to these organizations and by commenting on this issue when reviewing EIRs and other planning documents. This policy would be consistent with the requirements in some areas within the Agency, such as the County policy that requires all new golf courses to use 100% reclaimed water and the City of Camarillo that requires dual plumbing systems in new larger developments.

Another water conservation strategy is to require maximum feasible infiltration of stormwater within a new development (Low Impact Development). This strategy is only effective when the development overlies a recharge area for the aquifer. When a development overlies perched water or sealing clay near the surface, the infiltrated water does not benefit the aquifers.

10.1.12.2 ***Potential Effectiveness***

The effectiveness of this policy in reducing pumping depends upon the amount of groundwater that would otherwise be pumped from groundwater and delivered to the project. Many water purveyors within the FCGMA serve a blend of groundwater and imported water, so the pumping savings would be in the groundwater component. The savings would also depend upon the amount of non-potable water needs or uses within these projects. Where there is substantial landscaping in a new project, for example, the savings in potable water would be more substantial. In developments that require a dual plumbing system, there have been estimated savings of 30% to 40% in potable water use just from outdoor landscaping.

As discussed above, the effectiveness of maximizing recharge of stormwater can be variable. When a development is located in a basin such as the Oxnard Plain Forebay, percolation of rain is an important component of recharge and should be protected. In areas where percolated surface water does not reach the aquifers, the strategy is not effective.

10.1.13 Shelf Life for Conservation Credits

10.1.13.1 ***Description***

The initial 1985 FCGMA Management Plan set the policy that when a well operator pumped less than his allocation in any particular year, Conservation Credits were awarded for the unpumped portion of the allocation. The theory behind the Conservation Credit policy was that pumping would vary between wet and dry years; credits would be earned during wet years when pumping was reduced and the credits would then be used during the dry years when above-average pumping was required. With this scheme, pumping credits would theoretically zero-out at the end of each wet-dry cycle. However, no process was put in place to assure that large numbers of Conservation Credits were not accumulated beyond the end at each wet-dry cycle. The practical result of this policy is large numbers of Conservation Credits continue to accrue to some well owners – as many as tens of thousands of acre-feet of Conservation Credits have accrued to some organizations with multiple wells.

The current method of accumulating Conservation Credits with no expiration date has effectively left a large theoretical pumping debt on the aquifers (equivalent to several years of pumping at current extraction rates). This large debt complicates evaluation of the health of the basin because current groundwater conditions do not reflect this unused pumping debt. This is no different than judging a company's financial condition without considering monetary debt.

To bring FCGMA policy into line with the purpose for which credits were originally intended, several approaches are available. Perhaps the most important approach could be to have a limit on the annual use of these credits so that the aquifers would not be overly stressed in any single year. Another approach could be similar to that used in the adjacent Santa Paula basin, where the Stipulated Judgment from the basin adjudication allows unpumped allocations to be accumulated, but unlike in the FCGMA, any unpumped allocations for a single year expire after seven years. In this manner, accumulated debt is restricted to unpumped allocations earned within any single wet-dry cycle.

If unused credits were to expire after a period of time, the strategy would have to reflect a reasonable management strategy that takes into account the needs of pumpers, which vary by water use. For agricultural pumpers, credits are accrued for both future drought conditions and cropping changes. M&I pumpers may have accrued credits by substituting more-expensive imported water to provide a drought or emergency buffer. To ensure that any change in credit policy reflects these varying management strategies, the FCGMA should consider forming a committee (similar to the one that proposed the policy on calibration of meters) to study the issue and make recommendations on any policy changes. There are two issues that would need to be addressed – the shelf life on credits to be earned in the future and the fate of credits earned in the past.

This policy is not appropriate for Storage Credits, where water is stored for both dry periods and for emergencies such as earthquakes or levee failures in the Sacramento Delta. No change is recommended for Storage Credits.

10.1.13.2 __Potential Effectiveness__

The current policy for Conservation Credits allowing continuing accumulation makes it difficult to determine the current health of the basin – especially when the current pumping debt is equivalent to about three years' total pumping within the FCGMA. Modifying the FCGMA policy to expire older credits would allow a more accurate view of the health of the basin and would prevent a large pumping debt from accumulating. The effect a changed policy would have on future extractions within the FCGMA is not clear. On one hand, credit holders might be encouraged to pump credits prior to their expiration. This might effectively increase FCGMA pumping over its current levels, because some of these credits are currently being accumulated instead of being pumped. Alternatively, under the current policy of accumulating credits, many years-worth of accumulated credits could be pumped in a single dry year far exceeding any annual recharge, adversely impacting the groundwater basins through pulling in poor-quality waters and/or causing irreversible basin subsidence.

10.2 10-YEAR STRATEGIES

The following strategies that can be implemented within ten years are ranked by order of effectiveness and/or importance.

10.2.1 Additional In-Lieu Recharge to South Oxnard Plain

10.2.1.1 __Description__

One of the most effective management strategies in reducing overdraft is to supply water directly to overdrafted areas. This in-lieu strategy has been very effective in the Upper Aquifer System, where Santa Clara River water delivered through the Pumping Trough Pipeline has helped to alleviate the pumping trough that has been present for several decades beneath the south Oxnard Plain. Because the Lower Aquifer System now has its own pumping trough beneath the same area, extending the Pumping Trough Pipeline and/or bringing in water from other sources to the south Oxnard Plain would likely be equally as effective.

There are several options available to implement this strategy. UWCD could extend the Pumping Trough Pipeline to supply water to pumpers who are south of the current pipeline. The source of this water would likely be a combination of diverted Santa Clara River water and groundwater pumped from the Saticoy Wellfield located in the Oxnard Plain Forebay basin. UWCD has investigated such a project in the past, but costs were prohibitive. Another method of bringing water to the area would be to use Calleguas MWD's regional brine line (under construction in 2006) to bring recycled or other water from upstream areas, providing this water was of sufficient irrigation suitability. A third option would be to use water from Oxnard's GREAT project either for direct delivery to pumpers or for injection into the Lower Aquifer System. Any water delivered through an in-lieu program to this area should be eligible for credits. If there is any transfer of pumping back to the Oxnard Plain Forebay basin as part of a project using this strategy, then the considerations discussed in section 10.1.5 *Policy on Recovery of Credits from Oxnard Plain Forebay Basin* would be applicable.

10.2.1.2 __Potential Effectiveness__

Reducing pumping and/or injecting water into the aquifer in areas just inland of seawater intrusion can be a very effective strategy. Simulations of the Ventura Regional Groundwater Model that implement this management strategy have been shown to be effective in reducing the overdraft. For example, when 3,000 AFY of additional water are delivered or injected in the south Oxnard Plain, groundwater levels in the Lower Aquifer System rise by an average of 7 feet. The results of the groundwater modeling suggest that BMOs for groundwater levels would be met 53% of the time in the Upper Aquifer (compared to 51% with current management strategies) and 7% of the time in the Lower Aquifer (compared to 5% with current management strategies).

10.2.2 Import Additional State Water

10.2.2.1 __Description__

As part of a joint integrated water management plan, UWCD and Calleguas MWD are considering expansion of State Water importation by obtaining additional amounts of Ventura County's State Water allocation on a year-by-year basis when it is not used by other Ventura County agencies. This additional water would likely be delivered to Lake Piru and released as part of UWCD's conservation release to benefit the Oxnard Plain. Currently, State Water is released from Lake Piru by UWCD as part of its conveyance of stored storm water to downstream basins. Typically, a portion of the released water percolates into basins upstream from the Freeman Diversions and the remainder of the water is diverted for recharge (direct and in-lieu). How this additional State Water is used and accounted for will likely depend upon how it is financed.

10.2.2.2 ***Potential Effectiveness***

The effectiveness of new water importation depends upon how the water is recharged to the aquifers or delivered. If this imported water could be delivered to FCGMA pumpers in-lieu of pumping groundwater, then there would be a direct benefit to the aquifers from reduced pumping proportional to the amount of imported water. If, instead, this water was extracted by pumpers and substituted for a like amount of the imported water that would they would otherwise have delivered by Calleguas MWD, then the effects of the importation would be neutral. Thus, the ultimate fate of this additional imported water would govern the effectiveness of the strategy.

The Ventura Regional Groundwater Model was used to test the effectiveness of importing additional State Water. For the model scenario, the water was imported through Lake Piru, released with UWCD's annual conservation release down the Santa Clara River, diverted at the Freeman Diversion, and recharged in the Oxnard Plain Forebay basin. For the model simulation, it was assumed that 10,000 AFY of additional State Water were purchased in dry and average years. The results of the groundwater modeling suggest that Upper Aquifer groundwater levels in the Forebay basin would rise by an average of 6 feet. BMOs for groundwater levels would be met 54% of the time in the Upper Aquifer (compared to 51% with current management strategies) and 7% of the time in the Lower Aquifer (compared to 5% with current management strategies).

10.2.3 Further Destruction of Abandoned or Leaking Wells

10.2.3.1 ***Description***

With grant support, the FCGMA destroyed 49 abandoned or leaking wells that were considered by the FCGMA and UWCD to have the highest potential for cross-contamination from perched waters into the main aquifers within the FCGMA (cost and feasibility were also considered in ranking the wells for destruction). There remains a long list of additional wells that also have the potential for cross contamination of the aquifers. The FCGMA should give a priority to finding additional funds to continue this effort of well destruction.

10.2.3.2 ***Potential Effectiveness***

Destroying abandoned or leaking wells is very effective in preventing cross contamination of aquifers within the FCGMA. In the Oxnard Plain and Pleasant Valley basins, perched waters have a much higher head (elevation) than underlying aquifers, so the conditions for cross contamination are widespread. Although there are documented cases of this cross contamination occurring, it is not known how widespread this has actually occurred.

10.2.4 Additional Monitoring Needs

10.2.4.1 ***Description***

The current groundwater monitoring program has worked well in tracking saline intrusion beneath the Oxnard Plain. This monitoring network, along with a few other monitoring wells, were installed around 1990 by the US Geological Survey with financing provided by local agencies. Since the initial installation of the monitoring network, the continuing monitoring of these wells has been conducted by UWCD, VCWPD, and the City of San Buenaventura. As the saline intrusion on the south Oxnard Plain has moved inland, UWCD has sited and will drill two new multiple-completion monitoring wells inland of the saline intrusion. This increased monitoring program will adequately track water level and water quality trends on the south Oxnard Plain for the next several years.

In the Pleasant Valley basin, additional monitoring wells might be required if chloride levels continue to increase. The location of these potential monitoring wells would depend upon where the chloride increases occur. In the Las Posas basins, most of the existing monitoring utilizes existing production or injection wells. As part of the East Las Posas Basin Management Plan (Appendix C), new monitoring wells would provide information on the effects of the Calleguas Aquifer Storage and Recovery (ASR) project. Any such monitoring wells would likely be drilled by the Calleguas Municipal Water District. Monitoring of these wells would likely become a part of the overall Calleguas ASR monitoring program.

As more management strategies rely on increased pumping in the Oxnard Plain Forebay basin, increased monitoring will be required to ensure Forebay pumpers are not adversely affected or that pumping does not create additional groundwater problems. Increased monitoring in the Forebay has already been planned during operation of the UWCD Saticoy Wellfield. Additional monitoring should be required by the FCGMA for other projects where pumping will be shifted to the Forebay basin. An example is the GREAT project, where a substantial amount of pumping may be shifted to the Forebay; environmental documentation for the project proposes such increased monitoring. The exact monitoring required for any Forebay pumping that uses a transfer of credits should be appropriate to the location of increased pumping. At a minimum, this monitoring should include collection of monthly groundwater levels and quarterly water quality samples (to include constituents of concern such as nitrate and TDS) should include both Forebay monitoring and monitoring between the Forebay and the coast to determine potential effects in coastal groundwater levels.

10.2.4.2 ***Potential Effectiveness***

Monitoring by itself does not solve the overdraft problem, but it is essential in determining the effectiveness of the other management strategies. In particular, monitoring provides the continuing evaluation of whether basin management objectives are being met, and often serves to increase the understanding of the dynamics of the multiple aquifer systems identified within the FCGMA.

10.3 15-YEAR STRATEGIES

The following strategies that can be implemented within 15 years are ranked by order of effectiveness and/or importance.

10.3.1 Barrier Wells in South Oxnard Plain

10.3.1.1 ***Description***

Seawater barrier wells are used extensively in Los Angeles and Orange counties as a means of controlling seawater intrusion. A barrier project injects water along a series of wells creating a mound of recharge water as protection against seawater moving inland. Barrier wells are both expensive and complex, with costs of maintaining a barrier several times higher than for typical facilities in Ventura County such as the Freeman Diversion, spreading ponds, and distribution pipelines. In Los Angeles and Orange counties, there is a significant component of recycled water in the injected water. Thus, special health regulations govern this type of injection and are a necessary component of plans and facilities. In Ventura County, an attempt to construct a seawater barrier in the late 1970s and 1980s by the California Department of Water Resources in the Port Hueneme area was not particularly successful. Since that attempt, barrier wells were not seriously considered again because lower-cost options were identified.

We now know portions of the aquifer on the south Oxnard Plain are very difficult to recharge. In particular, the Lower Aquifer System of the south Oxnard Plain has been largely unaffected by spreading operations in the Oxnard Plain Forebay basin because this recharge is partially impeded from flowing into the areas of depressed groundwater levels by a fault or other structural barrier (see discussion in section 3.0 *Groundwater Basins and Hydrogeology – Oxnard Plain Basin*). The City of Oxnard GREAT project has evaluated barrier wells in the south Oxnard Plain as a method of delivering recycled water during winter months when agricultural irrigation demand is low. It may be prudent to consider expanding winter injection to more seasons of the year to create a full-time barrier. Additional source water for this full-time barrier would need to be identified.

A difficulty with barrier wells is that the injected water must be of very high quality to prevent clogging of the well screens. Thus, the source water for the injection would likely be a combination of highly-treated recycled water and potable water. The expense of building, maintaining, and providing water to a full-time barrier project currently makes such a project for Ventura County a lower priority. If other projects to supply in-lieu water to the south Oxnard Plain fail to prevent the increasing intrusion of saline waters or if a full-time barrier was considered as an add-on to injection wells already built through the GREAT project, then a full-time barrier project might be economically feasible.

As discussed in section 9.1 *GREAT Project (Recycled Water)*, FCGMA credits for recharge in a barrier project might be less than 1:1 because the recharged water might mix with contaminated saline groundwater. Likewise, if these credits are used for extraction from the Oxnard Plain Forebay basin, these extractions would have to follow uniform procedures addressed in section 10.1.5 *Policy on Recovery of Credits from Oxnard Plain Forebay Basin.*

10.3.1.2 Potential Effectiveness

Barrier wells could be very effective in preventing saline intrusion from moving further inland. Simulations of the Ventura Regional Groundwater Model indicate a barrier project with injection rates of 21,000 AFY into the Lower Aquifer System would raise Lower Aquifer water levels an average of 46 feet at the BMO wells, with an average groundwater elevation at the barrier of 28 ft msl. The rate of injection that was tested in the model was chosen to match the winter injection rate of the GREAT project at full planned implementation.

The groundwater modeling suggests that BMOs for groundwater levels would be met 63% of the time in the Upper Aquifer (compared to 51% with current management strategies) and 48% of the time in the Lower Aquifer (compared to 5% with current management strategies. The barrier project is the most effective strategy modeled in meeting BMOs (Table 8). However, the barrier would not prevent saline intrusion in areas inland of the barrier within the LAS groundwater depression in the Pleasant Valley basin; the only prevention for saline intrusion within the groundwater depression would be to raise groundwater levels within the depression.

10.3.2 Injection of Treated River Water into Overdrafted Basins

10.3.2.1 Description

A management strategy that is commonly suggested is taking diversions from the Santa Clara River when there is abundant river flow and injecting it into the aquifers that have depressed water levels. However, raw river water could not be injected without treatment that would bring the water to at least drinking water quality to prevent well clogging and potential health concerns; the cost of this treatment was generally considered to be prohibitive when compared

to other management strategies. This assumption may no longer be correct, as treatment costs become more affordable when compared to alternatives.

Much of the infrastructure to convey water from the Freeman Diversion to Pleasant Valley and the south Oxnard Plain already exists. The costs of the injection would be building a treatment facility, installing injection wells, and operating the treatment plant.

This injection would logically operate during periods when there is more water in the Santa Clara River than recharge facilities can accommodate. These conditions occur following rainstorms during many average precipitation years and can occur for extended periods (several months) during heavy precipitation years. The additional diversions could be conveyed to Pleasant Valley and the South Oxnard Plain via the existing Pleasant Valley and PTP pipelines. The raw water would then be treated and injected. Unlike aquifer storage and recovery (ASR) projects, the water would be placed in the aquifer for recharge purposes and would not be extracted at a later time as part of the project.

10.3.2.2 Potential Effectiveness

Besides reducing groundwater pumping in areas of lowered groundwater levels, providing direct recharge to affected aquifers is the most effective method of reducing pumping stresses and overdraft.

Injection of treated river water could be very effective in raising groundwater levels in the pumping depression in the south Oxnard Plain and Pleasant Valley basins. Simulations of the Ventura Regional Groundwater Model indicate an injection project with rates into the Lower Aquifer System of 1,500 AFY during dry years to 5,000 AFY during wet years would raise Lower Aquifer water levels an average of as much as 13 feet at the BMO wells in the area of injection.

The groundwater modeling suggests that BMOs for groundwater levels would be met 53% of the time in the Upper Aquifer (compared to 51% with current management strategies) and 11% of the time in the Lower Aquifer (compared to 5% with current management strategies.

10.3.3 Increase Diversions from Santa Clara River

10.3.3.1 Description

The Freeman Diversion was designed to divert more river water than current diversions. However, the current water right for the Freeman Diversion permitted by the State Water Resources Control Board is only 375 cfs (cubic feet per second) because other conveyance facilities downstream of the Freeman Diversion were not designed for the higher flow rate. If these conveyance facilities were modified and additional spreading facilities were constructed to physically handle the additional volume of water, a right to a higher diversion rate could be beneficial during periods of high flow in the river. Any higher diversion procedure would have to be designed so that there was sufficient water available for environmental uses. In order to increase diversions at the Freeman Diversion, a modified water right would have to be obtained from the State Water Resources Control Board and appropriate State and Federal agencies would have to be consulted. UWCD is studying options for such an expansion.

10.3.3.2 Potential Effectiveness

The Santa Clara River remains the primary recharge source for the Oxnard Plain basin and supplies significant recharge to the Pleasant Valley basin. It is clear that increased recharge since the Freeman Diversion was constructed has had a major positive impact in reducing seawater intrusion in the Upper Aquifer System. Likewise, many other strategies of this

Management Plan rely on substituting pumping in areas of poor recharge to pumping in the Oxnard Plain Forebay basin, which is easily recharged by water diverted from the Santa Clara River. Additional diversions and recharge to the Forebay basin, therefore, are necessary to make other management strategies possible.

UWCD's River Routing Model was used to predict the amount of additional diversions that were possible from peak winter storm flows at the Freeman Diversion, within the current 1,000 cfs flow capacity limitation of key portions of the conveyance system. The model, which uses daily flow data, predicted that additional potential diversions ranged from an average of 3,000 AFY during dry years to an average of 43,000 AFY in wet years. This additional water was largely recharged in hypothetical recharge facilities in the RiverPark and Ferro mining pits.

The Ventura Regional Groundwater Model simulations suggest that the additional diversions have several beneficial effects. The additional recharge from the diversions raise groundwater levels in the Upper Aquifer of the Oxnard Plain Forebay basin by more than 10 ft, allowing the Forebay to fully fill during wet years and lessening the impact of the dry-year pumping envisioned in other strategies in this Plan. At Upper and Lower Aquifer wells with BMOs, average groundwater levels would increase by about 3 ft. BMOs for groundwater levels would be met 54% of the time in the Upper Aquifer (compared to 51% with current management strategies) and 8% of the time in the Lower Aquifer (compared to 5% with current management strategies.

10.3.4 Shift Pumping to Northwest Oxnard Plain

10.3.4.1 ***Description***

The northwest Oxnard Plain, in the area south of the Santa Clara River, has historically had groundwater elevations that have rarely gone below sea level. There are also no submarine canyons offshore of the northwest Oxnard Plain, eliminating a short-circuit route for seawater intrusion to reach coastal aquifers. Groundwater gradients in the Upper Aquifer System indicate that some of the water recharged to the UAS in the Forebay likely flows offshore in the coastal northwest Oxnard Plain basin. Thus, this portion of the aquifer might sustain some increased pumping without negative consequences. The amount of pumping that could be shifted to this area would depend upon the configuration of the pumping wells and the volume of pumping.

10.3.4.2 ***Potential Effectiveness***

If pumping is shifted from areas that are difficult to recharge, such as the LAS in the southern portion of the Oxnard Plain basin and in the Pleasant Valley basin, to areas that are more-easily recharged, the effect is beneficial to the aquifers. Simulations of the Ventura Regional Groundwater Model indicate that with a shift of pumping of 2,000 AFY from near the edge of the Oxnard Plain Forebay basin to the northwest Oxnard Plain basin, groundwater levels improve less than a foot at wells with BMOs, but drop less than a foot in the northwest Oxnard Plain. Because the current groundwater levels in the Upper Aquifer of the northwest Oxnard Plain are more than 6 ft above their BMO, a more substantial shift in pumping could be accommodated, with a like amount of improvement in other areas of the coastal basins.

10.4 GREATER THAN 15-YEAR STRATEGIES

The following strategies that would be implemented later than 15 years are ranked by order of effectiveness and/or importance.

10.4.1 Additional Reductions in Pumping Allocations

10.4.1.1 ***Description***

After other feasible strategies for reducing the overdraft within the FCGMA are considered, pumping reductions beyond the 25% may have to be examined. As discussed below, any further pumping reductions may not be necessary if most of the strategies discussed in this Plan are implemented. These strategies are likely to be expensive, however, so the FCGMA should retain as a further strategy additional pumping reductions if the means are not found to implement the strategies. Any additional required reductions should be effected using the current system of allocations and efficiencies. If this step is necessary, it would be prudent to revisit whether agricultural efficiency should be tightened up or continue to be used, or whether all pumpers should use the allocation/credit method of reporting. If significant portions of the strategies recommended in this Plan are not implemented, consideration should be given to applying further pumping reductions only in areas where groundwater levels are particularly depressed. For instance, as part of the evaluation of basin yield (section 7.0 *Yield of the Groundwater Basins*), a further reduction of 85% in pumping in the south Oxnard Plain and Pleasant Valley basins allowed groundwater elevations to meet Basin Management Objectives.

10.4.1.2 ***Potential Effectiveness***

The necessity of any further pumping reductions was evaluated using the Ventura Regional Groundwater Model. This modeling suggested that with all strategies implemented, BMOs for groundwater levels would be met 67% of the time in the Upper Aquifer (compared to 51% with current management strategies) and 76% of the time in the Lower Aquifer (compared to 5% with current management strategies. Section 7.0 *Yield of the Groundwater Basins* discusses the issue of how often BMOs should be met to be protective of the basins in the FCGMA. The above numbers suggest that implementation of all the management strategies would vastly improve the health of the basins. Actual future observations of basin conditions, particularly the fate of sweater intrusion, will determine whether these strategies truly protect the basins. The modeling does suggest that further reductions in FCGMA extractions would not be warranted until the effect of the other management strategies can be observed or unless may of the strategies are not implemented because of financial or other reasons. However, implementation of a significant number of the strategies recommended in this Plan would be necessary to avoid further pumping reductions.

11.0 ACTION PLAN TO ATTAIN BASIN MANAGEMENT OBJECTIVES

11.1 PLANNING/IMPLEMENTATION ACTIONS

11.1.1 Strategic Planning

Many of the management strategies in this plan involve considerable cooperation among agencies within the FCGMA and come at considerable cost. The FCGMA is the common element among these agencies and is the appropriate forum in which to discuss the management strategies. Although many of the actual projects that would implement the management strategies would be built and managed by individual agencies within the FCGMA, the cost of the projects is likely to be spread to a wider group. Projects that have the most advantageous cost/benefit ratios would likely be supported by this wider group.

The FCGMA should initiate the discussion of how all the strategies fit together with current and future project of individual agencies. The topics to be covered could include:

1) Cost/benefit analyses of management strategies;

2) Cooperative efforts needed;

3) Methods to finance the projects;

4) Actions to implement the projects.

Parts of the analyses needed for the discussion have already been generated through agency's master planning efforts either within agencies or as larger cooperative efforts, and these plans cold be used as the starting point in these discussions.

11.1.2 Implementation

As a follow-up to the strategic planning effort, the FCGMA should take the results of the strategic planning and facilitate their implementation. The main focus of this effort would be to assist in cooperative efforts to implement the FCGMA management strategies.

11.2 RECOMMENDED CHANGES TO EXISTING FCGMA POLICIES

11.2.1 Continuation of 25% Pumping Reduction

Groundwater modeling of extending the phased FCGMA pumping reductions to their conclusion at 25% reductions indicated that this policy results in modest improvements at BMO indicator wells. Despite these modest improvements, it is necessary to continue this policy because the modeling also indicated that it will take the combination of all of the strategies recommended in this Plan to reach BMO goals – although individual strategies may not make large contributions, the sum of these strategies is the key to solving the overdraft problem. It is recommended that the FCGMA Board implement the delayed reduction to 20% before the end of 2007 and implement the reduction to 25% on the 2010 scheduled date.

11.2.2 Credits to be Transferred to Forebay Basin

Current water conservation facilities and FCGMA policies encourage reduced pumping in areas of seawater intrusion or overdrafted areas by moving those pumping stresses to areas that are more readily recharged. Examples of these projects are the Oxnard-Hueneme Pipeline system, the Pumping Trough Pipeline, and the Pleasant Valley Pipeline. A more recent transfer is for credits accrued by the Conejo Creek project to be used for extractions from the Oxnard Plain Forebay basin as part of the Supplemental M&I Water Program. The program has criteria to prevent adverse impacts from this increased pumping in the Forebay, including a restriction on pumping when groundwater elevations in key wells in the Forebay are below pre-determined levels.

The FCGMA should establish a policy for future credit transfers to the Forebay. This policy should include both criteria to ensure that projects do not harm the Forebay and to prioritize future projects if there is more demand for these transfers than the Forebay can accommodate. The Conejo Creek-Supplemental M&I Water projects serve as a good model for future projects that would provide in-lieu recharge or injection through wells in overdrafted areas and then recover that water from the Forebay or other areas that are readily recharged. Any such pumping using FCGMA credits should be able to demonstrate that a plan for increased pumping would not adversely impact the basin pumped. The FCGMA should encourage these types of projects, as long as there is a net benefit to the aquifers and the pumping does not adversely

affect that basin. Specific criteria that the FCGMA could use for future projects are discussed in section 10.1.5 *Policy on Recovery of Credits from Oxnard Plain Forebay Basin*.

11.2.3 Shift Some Pumping from Lower Aquifer System to Upper Aquifer System

A shift in pumping back to the UAS has already been initiated through County well permitting requirements. However, this shift should not be uniformly enforced across the basins within the FCGMA. A detailed plan must be formulated that takes into account local recharge sources, hydrologic connection between portions of the basin, and current/future in-lieu recharge projects. This should be accomplished through use of the Ventura Regional Groundwater Model in fine-tuning the details of this plan, with the FCGMA, VCWPD, and UWCD working together.

11.2.4 Irrigation Efficiency Calculation

As discussed in section 10.1.9 *Irrigation Efficiency Calculations*, the irrigation efficiency calculation should be revisited to ensure that the methodology gives appropriate results. The FCGMA Board should convene a committee of experts and stakeholders to examine the efficiency methodology. This committee would incorporate current methods of determining crop demand, including recommending updated weather station technology if necessary. The purpose of this exercise is to ensure that the efficiency calculations submitted to the FCGMA by agricultural irrigators are accurate. Any changes to the methodology should focus on improving actual irrigation efficiency by pumpers and ensuring pumpers reporting actual groundwater use against their allocation are on the same "level field" as those using irrigation efficiency.

The committee would also review whether 80% irrigation efficiency is appropriate to current farm management methods or whether this efficiency percentage should be changed. The committee should be convened within six months of adoption of this Management Plan. Recommendations of the committee would be presented to the FCGMA for possible modification of current ordinances.

11.2.5 Additional Monitoring

Additional monitoring may be required by the FCGMA when certain management strategies are implemented. For instance, projects that rely upon new pumping from the Forebay basin, as a result of water delivery to areas that are not as readily recharged such as the south Oxnard Plain, may require additional monitoring to ensure that other Forebay pumpers are not adversely impacted. It is recommended that this additional monitoring be a condition of approval for applying pumping credits to the Forebay when they are earned elsewhere within the FCGMA.

Additional monitoring is also required as part of the East Las Posas Basin Management Plan (Attachment C). This additional monitoring is incorporated in the FCGMA Management Plan by reference.

In addition, monitoring should also be required for projects in the future that pump poor-quality water without an allocation along Calleguas Creek. This monitoring would focus on detecting both improvements in water quality in the pumped area and un-anticipated changes in water levels or water quality in adjacent portions of the FCGMA aquifers.

11.2.6 Use Penalties to Purchase Replacement Water

The FCGMA charges a penalty to pumpers for extracting more water than is allowed under the various allocations (Historical, Baseline, Irrigation Efficiency). The increased groundwater use caused by the over-pumping could be offset by using the fees generated by penalties to purchase replacement water for the extracted groundwater. The FCGMA has several options to obtain additional water, including purchasing unused portions of Ventura County's State Water Allocation, paying M&I users to increase their imported/groundwater blend, and purchase of water through a variety of programs from the State or others such as turn-back pool water, Dry-Year Purchase Program, and other programs. This water could be delivered through either conveyance down the Santa Clara River or Calleguas MWD's pipeline, depending upon how the water was purchased and used.

11.3 RECOMMENDED ADDITIONS TO FCGMA POLICIES

11.3.1 5-Year Update of FCGMA Management Plan

It is recommended that this Plan be updated every five years. This update should include a status of how the BMOs are being met, effectiveness of strategies that have been implemented, status of other recommended strategies, and recommendations for any additional management strategies.

11.3.2 Separate Management Plans for Some Basins

All of the basins within the FCGMA are managed under an umbrella of this Management Plan. However, there are circumstances in some of the basins that require additional management policies, such as in the East Las Posas basin. It is recommended that the FCGMA Board adopt the East Las Posas Management Plan (Appendix C) by resolution. In addition, the policies on pumping and treating poorer quality groundwater without an allocation should be incorporated into FCGMA policy by adopting this overall FCGMA Management Plan.

It is recommended that no changes be made to current FCGMA pumping reductions that treat all the FCGMA basins the same. It would be appropriate to revisit this policy in the future if basin management objectives have been achieved in a particular basin; the FCGMA Board might consider whether it is appropriate to continue with additional pumping reductions.

11.3.3 Adoption of Basin Management Objectives

The basin management objectives recommended in this Management Plan should be adopted by resolution by the FCGMA Board. As additional information becomes known about individual groundwater basins, it may be appropriate to modify the recommended objectives and/or to add additional objectives.

11.3.4 Extractions of Poor-Quality Water Without an Allocation

There are additional areas along Calleguas Creek besides the South Las Posas basin where groundwater has elevated salinity. Base flow from the Arroyo Las Posas has migrated completely across the South and East Las Posas basins and into the northernmost Pleasant Valley basin, providing a source of new recharge to this portion of the Pleasant Valley basin. However, this new recharge water has created water quality problems for groundwater pumpers. City of Camarillo wells in this area have experienced increased salts as groundwater

levels have risen over the last decade, similar to what has already happened in the South and East Las Posas basins.

Extraction of this groundwater is an appropriate groundwater management strategy providing that either: 1) extracting the groundwater improves the overall water quality in the basin without also causing overpumping of the basin or 2) extracting the groundwater provides a new water supply outside of those currently allocated by the FCGMA. If these conditions are not met, then the extractions should be debited against an existing allocation. In the South Las Posas basin, for example, pumping and treating the shallow groundwater would both improve the water quality and not reduce supplies to the basin (better quality stormwater that now bypasses the basin would then have the ability to infiltrate and replace the pumped water). Alternatively, if shallow groundwater along Calleguas Creek was not hydraulically connected to the main portion of the basin, and pumping that groundwater would have no effect on groundwater in the main basin, then pumping this groundwater could provide a new supply of water. This lack of hydrologic connection would have to be demonstrated using standard geologic techniques. These techniques would include analysis of groundwater levels, water quality parameters, well logs, age-dating, geochemical analyses, or other techniques.

11.3.5 Barrier Wells

As discussed in section 10.3.1 *Barrier Wells in South Oxnard Plain*, construction of injection barrier wells near the coastline to prevent landward migration of saline intrusion is one management strategy. Under current FCGMA policy, any project in the future that has barrier wells as a project component would need FCGMA approval to earn extraction credits that could be used to pump a like amount of groundwater elsewhere within the FCGMA. As discussed in section 10.1.5 *Policy on Recovery of Credits from Oxnard Plain Forebay Basin*, there may be issues related to the pump-back. It is recommended that any such FCGMA approval be contingent upon analysis of the potential effectiveness of the barrier in the improving water quality, analysis showing that pumping credits earned by injection that are used elsewhere does not adversely affect the pumped area, and a monitoring program to measure the effects of both the barrier wells and the extraction wells.

11.3.6 Protecting Recharge Supplies

Because of the importance of preserving current recharge sources for the aquifers and potentially adding additional recharge, the FCGMA adopts a policy that protects these recharge sources. Although the FCGMA cannot determine water rights, it will use its influence with other agencies to ensure protection of the recharge sources. FCGMA actions might include writing letters of support, discussing the issues with other agencies, and testifying at hearings related to these recharge sources.

11.3.7 Nitrate Sources in Oxnard Plain Forebay Basin

It is recommended that the FCGMA develop a policy to limit high-nitrate crops in reclaimed gravel basins where there is little or no vadose zone for degradation of the nitrate before it reaches groundwater. The particulars of this issue are discussed in section 10.1.4 *Limitation on Nitrate Sources in Portions of the Oxnard Plain Forebay Basin*.

11.3.8 Additional Conservation Measures

It is recommended that the FCGMA Board adopt a policy encouraging all planning agencies within the FCGMA to require dual plumbing in new developments where treated wastewater is feasible for use. As part of this policy, the FCGMA should work with planners to incorporate these policies into general plans and other appropriate planning documents.

11.3.9 Verification Procedure for Extraction Reporting

It is recommended that the FCGMA establish a verification procedure to ensure that self-reporting of extractions by pumpers to the FCGMA is accurate. This procedure could be as simple as an annual random inspection of a few meters to ensure that the meter is installed and that the readings that are reported to the FCGMA agree with the meter readings.

11.3.10 Consideration of Further Pumping Reductions

If most of the effective strategies recommended in this Plan are not implemented because of cost, lack of cooperation, lack of will, or some other factor, the FCGMA should consider further pumping reductions. The actual reductions required would depend upon how the basins have responded to the strategies that have been implemented, and the required reductions could be determined using the groundwater model at that time.

12.0 SUMMARY OF FCGMA MANAGEMENT STRATEGIES

FCGMA management strategies are separated into three categories – current, in development, and future. Each strategy has a short description. For a full discussion of each strategy, refer to the earlier three sections on management strategies. Some of these strategies related directly to FCGMA ordinances and other actions. Many of these strategies are carried out by agencies other than the FCGMA, but FCGMA policies either encourage these projects or make them possible through the credit program.

12.1 CURRENT STRATEGIES

Includes those within the original 1985 FCGMA Management Plan and those that have been developed since that time:

- Limitation of Groundwater Extractions – 25% phased reduction in pumping, including 80% agricultural efficiency.
- Encourage Both Wastewater Reclamation and Water Conservation – Encouraged use of recycled water and water conservation techniques.
- Operation of the Oxnard Plain Seawater Intrusion Control Project (UWCD's Pumping Trough Pipeline, Lower Aquifer System Wells, Freeman Diversion) – Encourage UWCD projects.
- Annual Groundwater Monitoring Program – Conducted by VCWPD and UWCD.
- East and West Las Posas Basin Pumping Restrictions – Restricted water use outside La Posas basin and FCGMA boundary.
- Monitor FCGMA Groundwater Extractions – Program of reporting extractions to FCGMA.
- Implementation of Drilling and Pumping Restrictions – Various policies for aquifers used for water production and for well completions.

- Metering of Groundwater Extractions – Required meters on all except domestic wells.
- Fox Canyon Outcrop Expansion Area – Grandfathered some historic areas where groundwater pumped from within the FCGMA is delivered outside of Agency boundaries.
- Noble Spreading Basins – Encouraged expanding UWCD historical artificial recharge areas.
- Las Posas Basin ASR Project – Set criteria for Aquifer Storage and Recovery project in Las Posas basin.
- Conejo Creek Diversion Project – Allowed credits for diversion and delivery of water to pumpers in-lieu of their pumping groundwater.
- Supplemental M&I Water Program – Allowed credits earned in Pleasant Valley basin to be pumped from Oxnard Plain Forebay basin which is more easily recharged.
- Saticoy Wellfield – Groundwater pumped by UWCD from Oxnard Plain Forebay basin is delivered to pumpers in Oxnard Plain and Pleasant Valley basins in lieu of pumping local groundwater.
- Importation of State Water – Credits earned by UWCD for importing State Water for recharge are put in a special account to help solve management problems in the future.
- Calibration of Groundwater Extraction Meters – Meters on wells will now be re-calibrated every three years.

12.2 STRATEGIES UNDER DEVELOPMENT

Includes strategies in which planning and design of projects is currently taking place:

- RiverPark Recharge Pits – Encourage additional recharge facilities in Forebay.
- GREAT Project (Recycled Water) – Credits earned from in-lieu deliveries and injection of recycled can be pumped from Forebay.
- South Las Posas Basin Pump/Treat – Poor quality water can be pumped and treated without using credits.
- Development of Brackish Groundwater, Pleasant Valley Basin – Poor quality water may be able to be pumped and treated without using credits.
- Non-Export of FCGMA Water – Enforce current restrictions on water export; determine procedure for periodic evaluation of whether there are new water exports.

12.3 FUTURE STRATEGIES – 5 YEARS

Includes strategies that could be implemented within the first 5 years (ranked in order of effectiveness):

- 5-Year Update of FCGMA Management Plan – Regular updating of plan, report on BMOs and progress

- Plan to Shift Some Pumping Back to Upper Aquifer System – Shift some new wells back to UAS, with area and number to be determined jointly with UWCD using Ventura Regional Groundwater Model.
- Protect Current Sources of Recharge – Use FCGMA influence with regulatory agencies to ensure that sources of recharge such as the Santa Clara River are not degraded or unduly dedicated to non-recharge uses.
- Limitation on Nitrate Sources in Portions of the Oxnard Plain Forebay Basin – Limit high-nitrate crops in reclaimed gravel basins in Forebay where a vadose zone is either very thin or missing.
- Policy on Recovery of Credits from Oxnard Plain Forebay Basin – Adopt a recommended policy for transfer of credits for pumping in the Oxnard Plain Forebay basin.
- Verification of Extraction Reporting – Annually check a few random wells for meter use and accurate reporting of meter readings.
- Separate Management Strategies for Some Basins – Adopt East Las Posas Basin Management Plan.
- FCGMA Boundary – Adjust FCGMA boundary to conform to Oak Ridge fault and boundary with Santa Paula Basin Adjudication.
- Irrigation Efficiency Calculations – Consider modifying calculations for Irrigation Efficiency Allocation.
- Additional Storage Projects in Overdrafted Basins – Consider storage projects in Pleasant Valley and perhaps southern Oxnard Plain basins, ensuring that the storage does not interfere with current groundwater uses or recharge to the basin.
- Penalties Used to Purchase Replacement Water – Use penalties for pumping beyond allocation to purchase water for recharge to the aquifers.
- Additional Water Conservation – Encourage agencies and cities to require dual plumbing in new developments, where possible, to replace groundwater use with recycled water.
- Shelf Life for Conservation Credits – Allow Conservation Credits to expire after a wet-dry cycle to bring credit policy in line with goals of this program.

12.4 FUTURE STRATEGIES – 10 YEARS

Includes strategies that could be implemented within 5 to 10 years (ranked in order of effectiveness):

- Additional In-Lieu Recharge to South Oxnard Plain – Deliver additional water to southern Oxnard Plain to offset pumping.
- Import Additional State Water – Import and recharge more of Ventura County's State Water Allocation.

- Further Destruction of Abandoned or Leaking Wells – Seek grant funding to reinstate program of destroying abandoned or leaking wells that pose a risk of cross contamination of FCGMA aquifers.
- Additional Monitoring Needs – Support UWCD and VCWPD in determining additional monitoring needs as contamination threats evolve.

12.5 FUTURE STRATEGIES – 10 TO 15 YEARS

Includes strategies that could be implemented within 10 to 15 years (ranked in order of effectiveness):

- Barrier Wells in South Oxnard Plain – Develop a policy for credits for water injected in barrier wells.
- Injection of Treated River Water into Overdrafted Basins – Treat diverted river water to drinking water quality and recharge it through injection in Oxnard Plain and Pleasant Valley basin.
- Increase Diversions from Santa Clara River– Increase diversions of high-volume storm flows for recharge.
- Shift Pumping to Northwest Oxnard Plain – Shift some pumping to the more easily recharged northwestern Oxnard Plain.

12.6 FUTURE STRATEGIES – GREATER THAN 15 YEARS

Includes strategies that could be implemented more than 15 years from now (ranked in order of effectiveness):

- Additional Reductions in Pumping Allocations – As a last resort if the other strategies fail to meet Basin Management Objectives, consider reducing allocations beyond the required 25% reduction. Also consider focusing these reductions in the south Oxnard Plain and Pleasant Valley basins where groundwater levels are particularly depressed.

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A 1.0 APPENDIX A - PROGRESSION OF SEAWATER INTRUSION BENEATH THE SOUTH OXNARD PLAIN

Although seawater intrusion under the Oxnard Plain has been studied over several decades, the details of the intrusion have not been analyzed until recently when United Water Conservation District (UWCD) entered all historic data on water levels, water quality, and well construction into digital databases and GIS coverages so the entire data set could be analyzed systematically. This new analysis uses all this digital information to construct a series of maps depicting groundwater levels and chloride concentrations in wells within the south Oxnard Plain from as far back as 1920. The analysis used 5-year time slices in both the Lower Aquifer System and Upper Aquifer System to determine when groundwater levels first dropped below sea level, when chloride levels first increased as a result of the landward gradient caused by these lowered groundwater levels, and the progression of saline water since that time.

Saline intrusion is recognized in monitoring wells by concentrations of chloride and Total Dissolved Solids (TDS) that are several times higher than the Basin Plan Objectives of 150 mg/L and 1,200 mg/L, respectively. In practice, the leading edge of the intrusion is mapped on the Oxnard Plain as the first occurrence of chloride in excess of 500 mg/L., which is used in the following set of maps.

Groundwater levels first dropped below sea level in the period 1945-49 in the Upper Aquifer System (Figure 34), although groundwater levels were scarce at the coastline for some years prior to that time. In the following 5-year time slice of 1950-54 (Figure 35), groundwater levels dropped below sea level across much of the south Oxnard Plain, and chlorides increased to as much as 1,925 mg/L at the Port Hueneme coastline. Thus, the apparent time lag between groundwater dropping below sea level and the encroachment of seawater was somewhere in the range of 5 to 10 years. In the following 5-year time slice of 1955-59, chlorides increased rapidly in coastal wells, reaching as high as 27,350 mg/L (Figure 36).

Although a few sampled wells may have had corroded casings that allowed poorer-quality perched water to flow into the well, most of the early chloride readings were taken from pumping wells with a smaller chance of significant cross-contamination during sampling (groundwater flowing into pumping wells would likely come mostly from screened intervals in the well). Outliers of wells with poorer quality water were not considered in the interpretation of the areas of saline intrusion to minimize random instances of cross-contamination; it was only concentrations of wells with poor quality water that were considered as significant. Within the first 20 years of intrusion, higher chloride levels were evident up to 3 miles inland from the area of initial intrusion, an intrusion rate of about 800 feet per year. This rate of intrusion is similar to rates calculated for seawater intrusion in the Salinas groundwater basin (e.g., CDWR, 1973).

The intrusion of the Upper Aquifer System in the Port Hueneme area was temporarily arrested during the mid 1980s following a wet climatic cycle (e.g., Figure 42). As the new FCGMA policies, the Freeman Diversion, and the PTP Pipeline came online, chloride levels in the Port Hueneme saline lobe in the Upper Aquifer System continued to decrease, with chloride concentrations in some wells near the coastline returning to drinking-water quality. However, chloride levels remain high in smaller lobes centered around both Port Hueneme Harbor and Mugu Lagoon (Figure 44). Unfortunately, some of the saline water intruded around Port Hueneme did not exit via the canyon when high water levels return. Unquantified amounts of saline water were transported to the southeast along the coast by the prevailing (non-drought period) groundwater gradient.

Intrusion in the Lower Aquifer System lagged considerably in time behind the Upper Aquifer System. Groundwater levels near the coastline first went below sea level in the 1955-59 time period (Figure 48), but high chlorides were not detected until the 1985-89 time period at Port Hueneme and the 1990-94 time period near Point Mugu (Figure 52, Figure 53), some 30 years later. This time lag is partially caused by the longer travel time for seawater intruded from the Lower Aquifer System outcrops along the offshore Hueneme Submarine Canyon walls and partially the result of the lack of monitoring points right at the coastline until the USGS monitoring wells were drilled in the late 1980s and early 1990s. As discussed in section 5.0 *Water Quality Issues*, the U.S. Geological Survey interpretation is that the majority of the saline intrusion in the Lower Aquifer System near Point Mugu is saline water being pulled from surrounding sediments rather than from the ocean itself (see Figure 56).

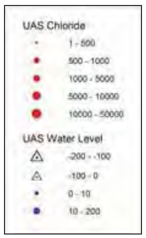

Figure 29. Legend for Figure 30 to Figure 44 for Upper Aquifer System time slices. Chloride concentrations are in mg/L, water level is elevation above or below mean sea level. All maps are oriented with north to the top of the page. Area of map coincides with location map in Figure 2 in section 2.0 *Background of Groundwater Management and Overdraft Within the FCGMA.*

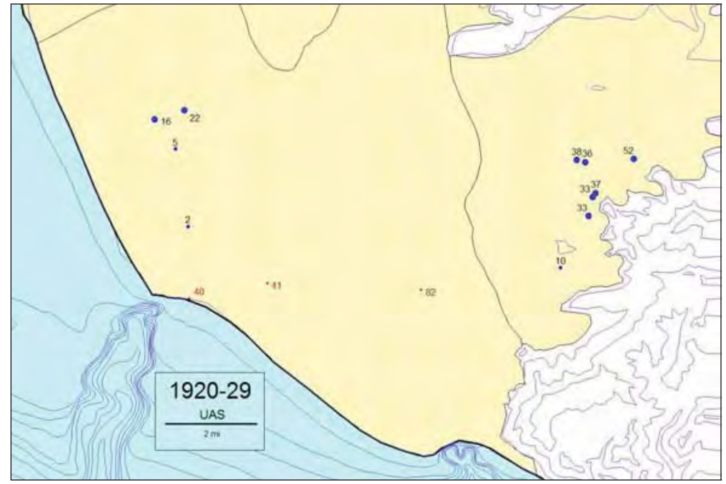

Figure 30. Upper Aquifer System groundwater levels and chloride levels, 1920 to 1929. Legend is shown in Figure 29. Line in title block is two miles in length.

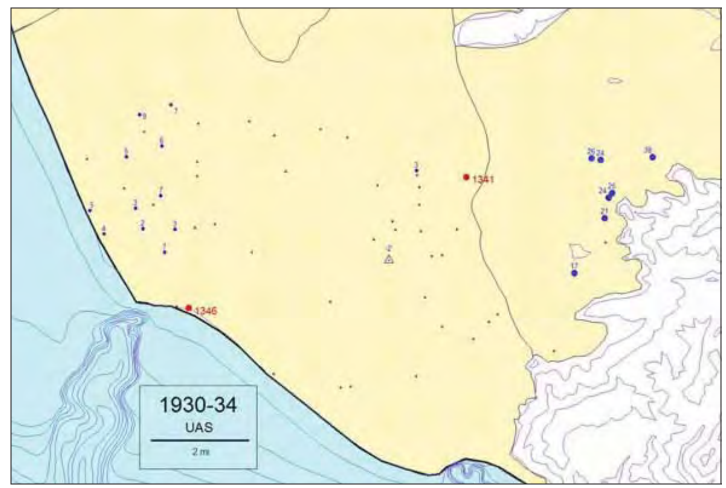

Figure 31. Upper Aquifer System groundwater levels and chloride levels, 1930 to 1934. Legend is shown in Figure 29. Line in title block is two miles in length.

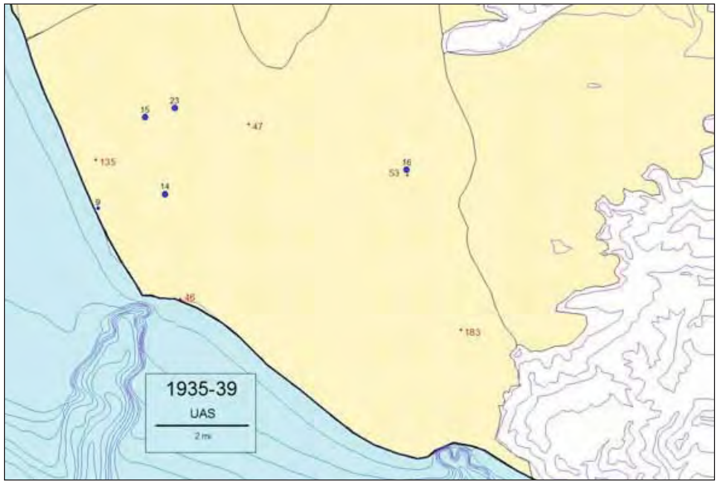

Figure 32. Upper Aquifer System groundwater levels and chloride levels, 1935 to 1939. Legend is shown in Figure 29. Line in title block is two miles in length.

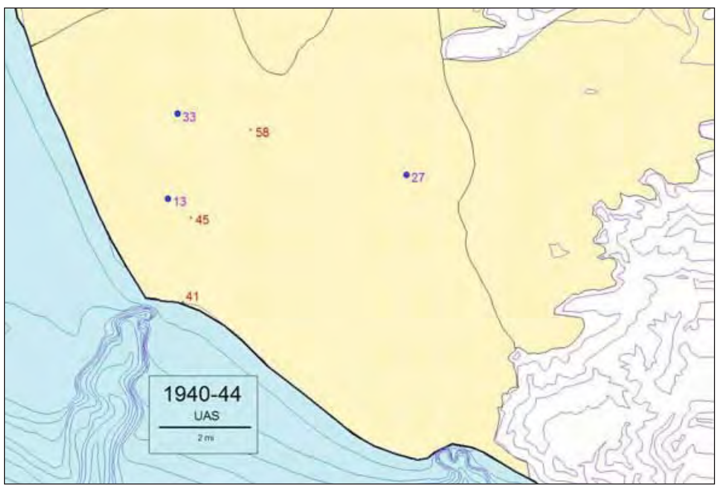

Figure 33. Upper Aquifer System groundwater levels and chloride levels, 1940 to 1944. Legend is shown in Figure 29. Line in title block is two miles in length.

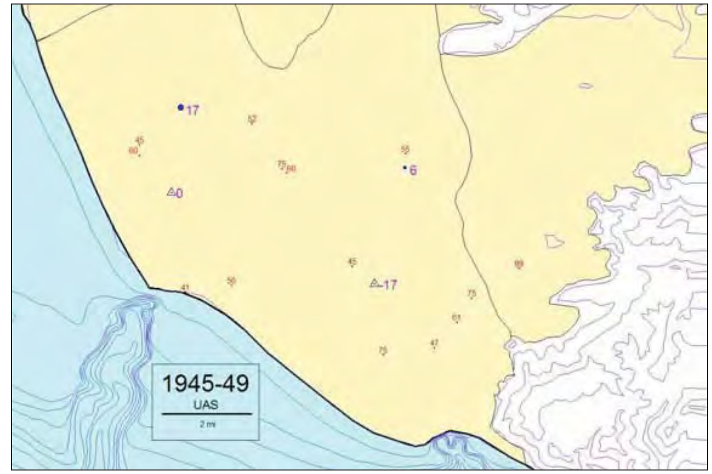

Figure 34. Upper Aquifer System groundwater levels and chloride levels, 1945 to 1949. Legend is shown in Figure 29. Line in title block is two miles in length.

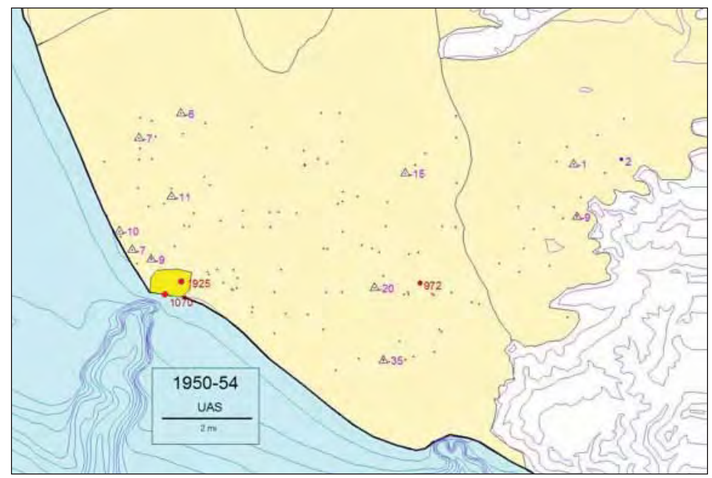

Figure 35. Upper Aquifer System groundwater levels and chloride levels, 1950 to 1954. Legend is shown in Figure 29. Bright yellow area is intruded by seawater near Hueneme Submarine Canyon. Line in title block is two miles in length.

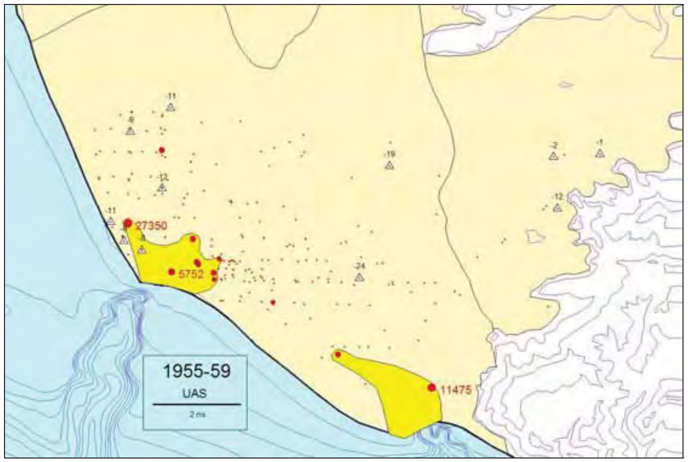

Figure 36. Upper Aquifer System groundwater levels and chloride levels, 1955 to 1959. Legend is shown in Figure 29. Bright yellow areas are intruded by saline waters. Line in title block is two miles in length.

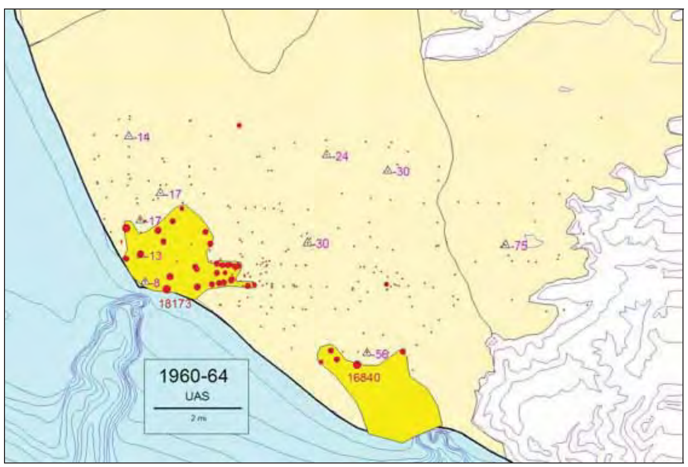

Figure 37. Upper Aquifer System groundwater levels and chloride levels, 1960 to 1964. Legend is shown in Figure 29. Bright yellow areas are intruded by saline waters. Line in title block is two miles in length.

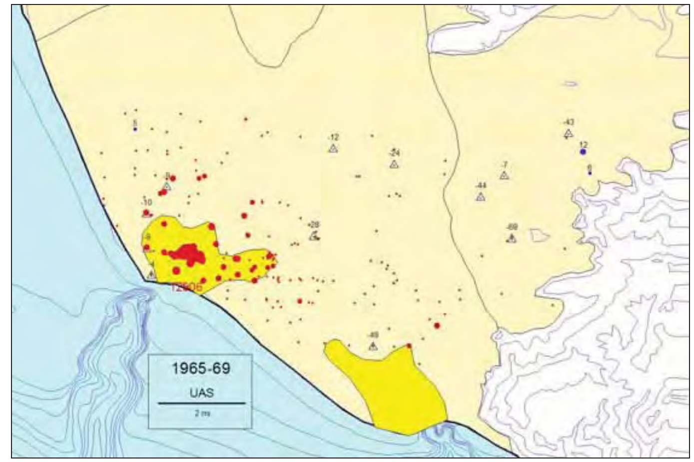

Figure 38. Upper Aquifer System groundwater levels and chloride levels, 1965 to 1969. Legend is shown in Figure 29. Bright yellow areas are intruded by saline waters. Line in title block is two miles in length.

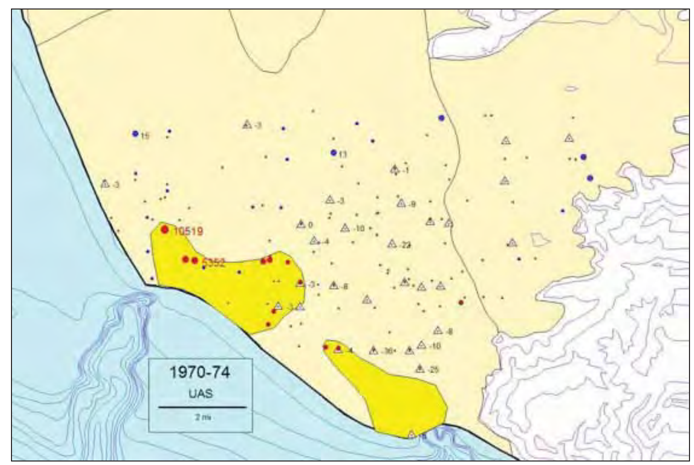

Figure 39. Upper Aquifer System groundwater levels and chloride levels, 1970 to 1974. Legend is shown in Figure 29. Bright yellow areas are intruded by saline waters. Line in title block is two miles in length.

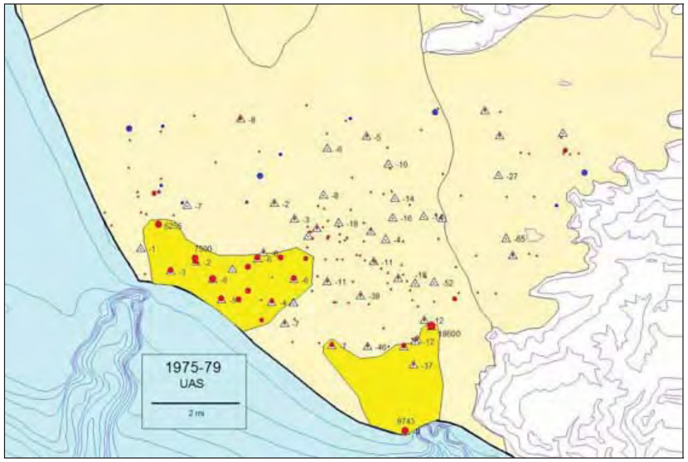

Figure 40. Upper Aquifer System groundwater levels and chloride levels, 1975 to 1979. Legend is shown in Figure 29. Bright yellow areas are intruded by saline waters. Line in title block is two miles in length.

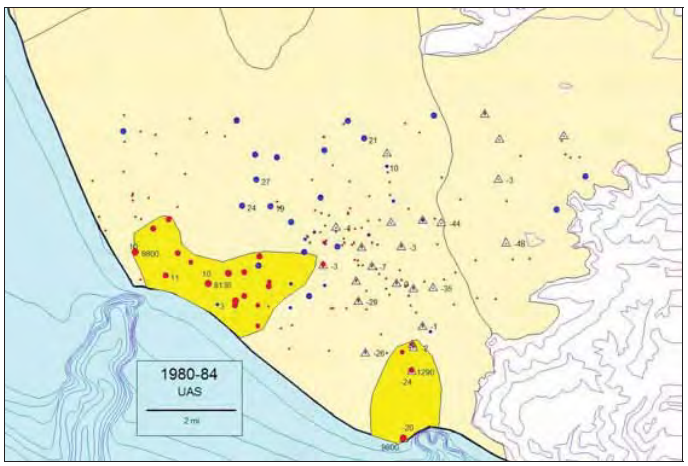

Figure 41. Upper Aquifer System groundwater levels and chloride levels, 1980 to 1984. Legend is shown in Figure 29. Bright yellow areas are intruded by saline waters. Line in title block is two miles in length.

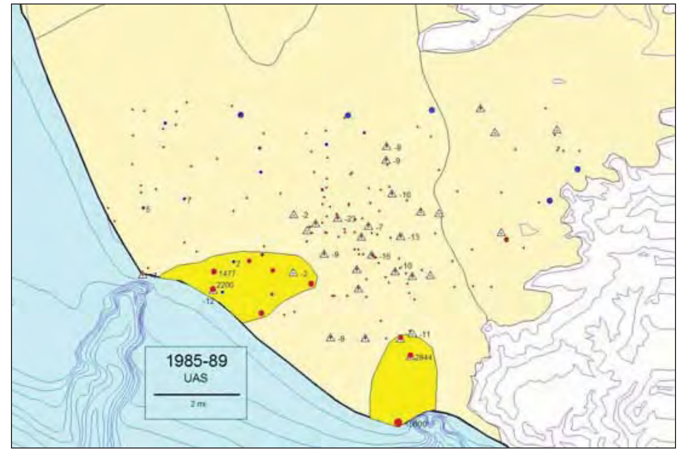

Figure 42. Upper Aquifer System groundwater levels and chloride levels, 1985 to 1989. Legend is shown in Figure 29. Bright yellow areas are intruded by saline waters. Line in title block is two miles in length.

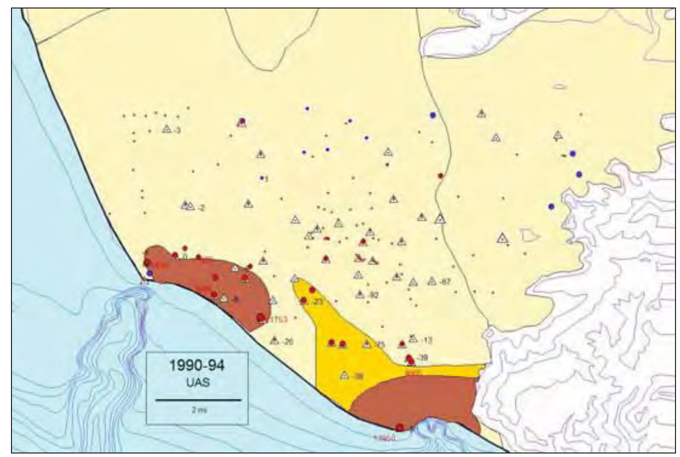

Figure 43. Upper Aquifer System groundwater levels and chloride levels, 1990 to 1994. Legend is shown in Figure 29. Source of saline intruded areas: reddish brown is from seawater; yellow-orange is from sediments. Line in title block is two miles in length.

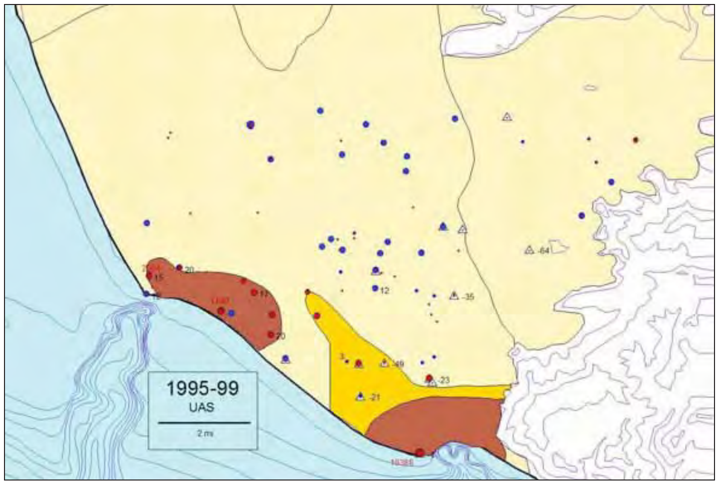

Figure 44 Upper Aquifer System groundwater levels and chloride levels, 1995 to 1999. Legend is shown in Figure 29. Source of saline intruded areas: reddish brown is from seawater; yellow-orange is from sediments. Line in title block is two miles in length.

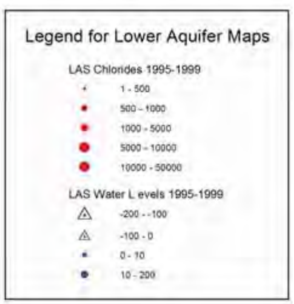

Figure 45. Legend for Figure 46 to Figure 56 for Lower Aquifer System time slices. Chloride concentrations are in mg/L, water level is elevation above or below mean sea level. All maps are

oriented with north to the top of the page. Area of map coincides with location map in Figure 2 in section 2.0 *Background of Groundwater Management and Overdraft Within the FCGMA*.

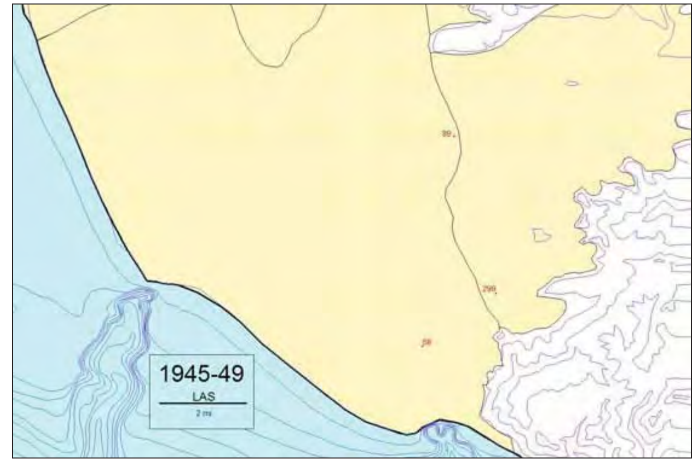

Figure 46. Lower Aquifer System groundwater levels and chloride levels, 1945 to 1949. Legend is shown in Figure 45. Line in title block is two miles in length.

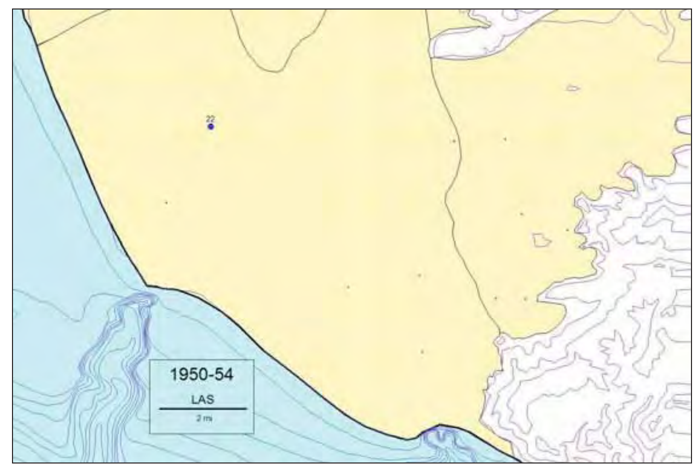

Figure 47. Lower Aquifer System groundwater levels and chloride levels, 1950 to 1954. Legend is shown in Figure 45. Line in title block is two miles in length.

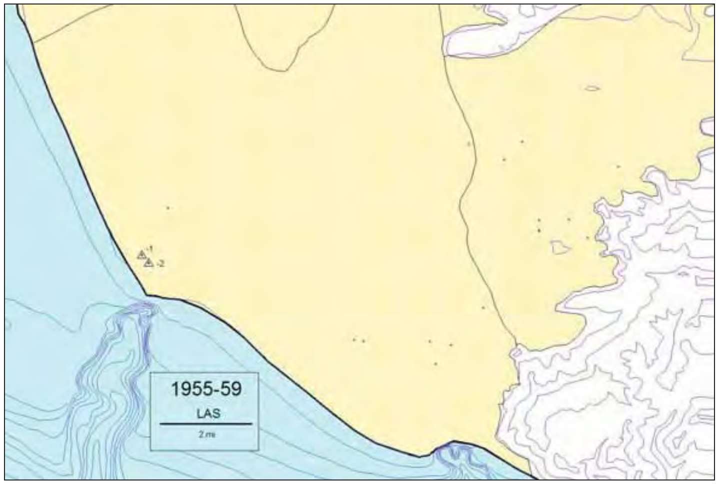

Figure 48. Lower Aquifer System groundwater levels and chloride levels, 1955 to 1959. Legend is shown in Figure 45. Line in title block is two miles in length.

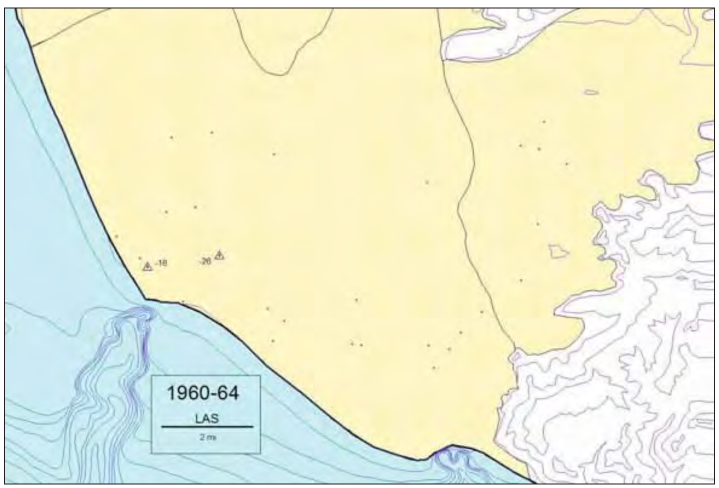

Figure 49. Lower Aquifer System groundwater levels and chloride levels, 1960 to 1964. Legend is shown in Figure 45. Line in title block is two miles in length.

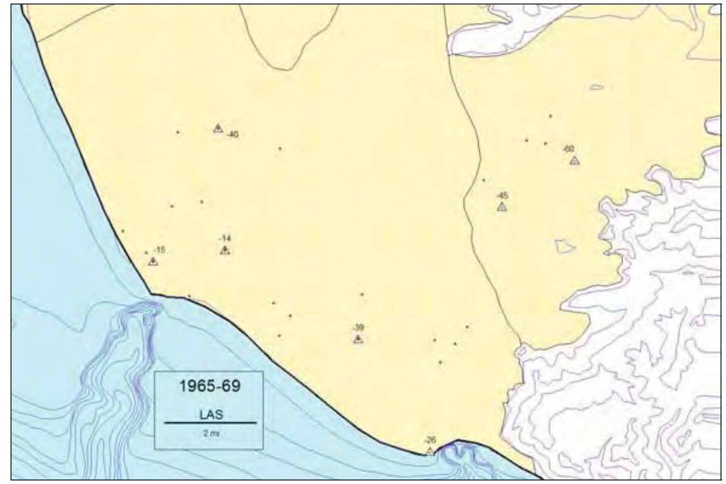

Figure 50. Lower Aquifer System groundwater levels and chloride levels, 1965 to 1969. Legend is shown in Figure 45. Line in title block is two miles in length.

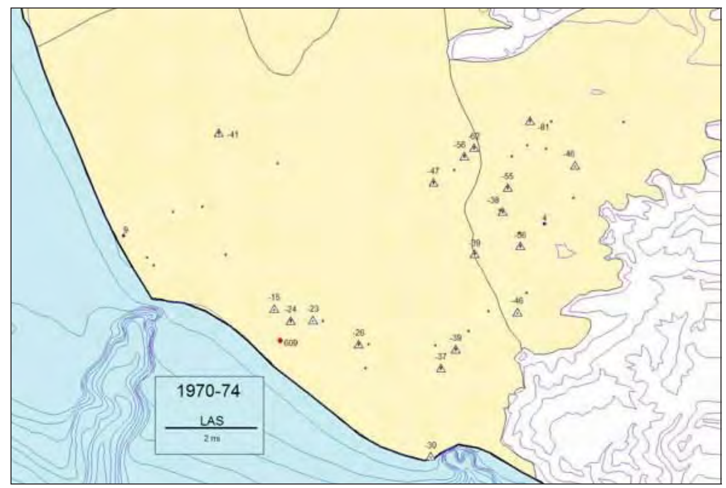

Figure 51. Lower Aquifer System groundwater levels and chloride levels, 1970 to 1974. Legend is shown in Figure 45. Line in title block is two miles in length.

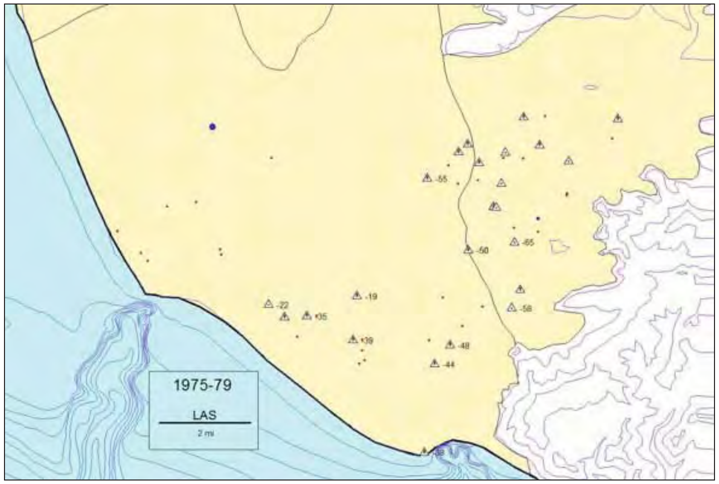

Figure 52. Lower Aquifer System groundwater levels and chloride levels, 1975 to 1979. Legend is shown in Figure 45. Line in title block is two miles in length.

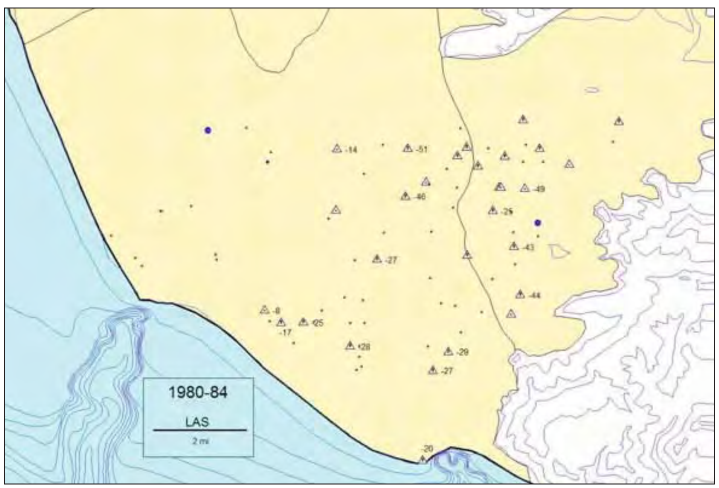

Figure 53. Lower Aquifer System groundwater levels and chloride levels, 1980 to 1984. Legend is shown in Figure 45. Line in title block is two miles in length.

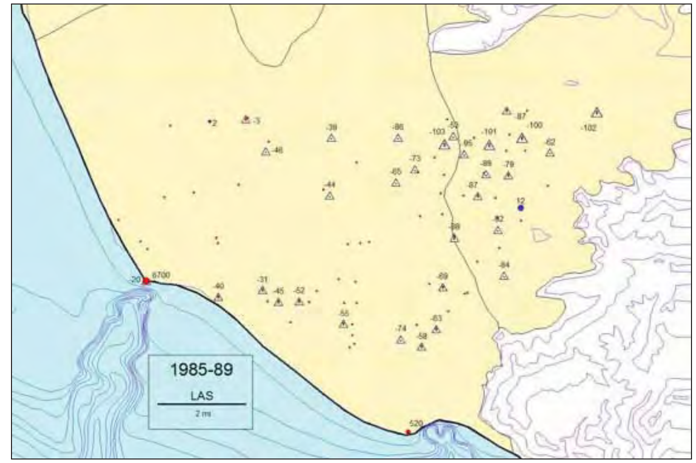

Figure 54. Lower Aquifer System groundwater levels and chloride levels, 1985 to 1989. Legend is shown in Figure 45. Note start of seawater intrusion (red dot) at head of Hueneme Submarine Canyon. Line in title block is two miles in length.

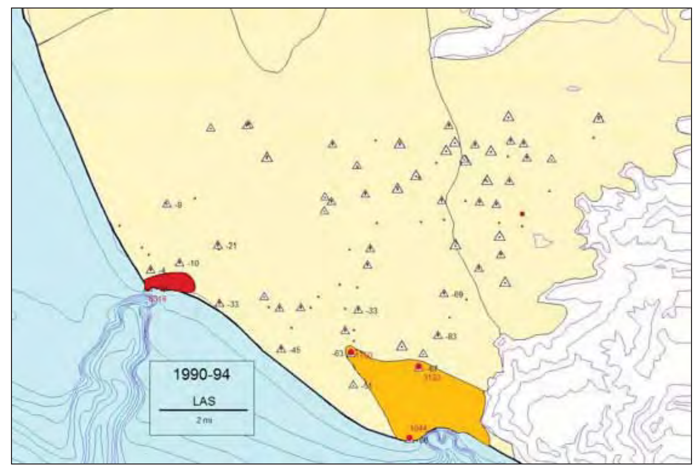

Figure 55. Lower Aquifer System groundwater levels and chloride levels, 1990 to 1994. Legend is shown in Figure 45. Source of saline intruded areas: reddish brown is from seawater; yellow-orange is from sediments. Line in title block is two miles in length.

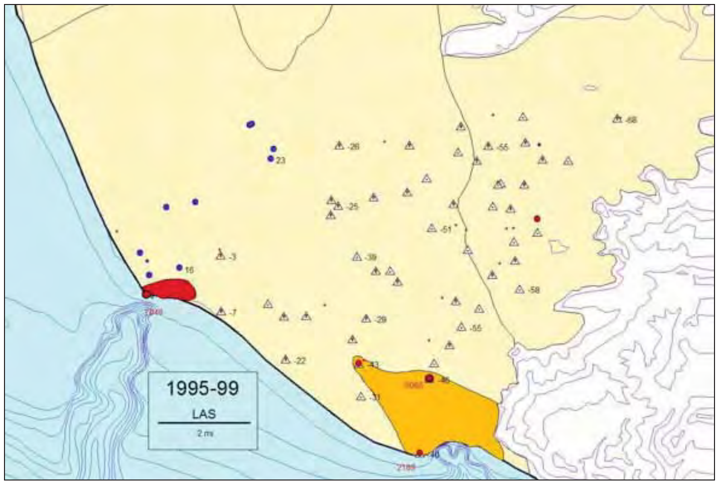

Figure 56. Lower Aquifer System groundwater levels and chloride levels, 1995 to 1999. Legend is shown in Figure 45. Source of saline intruded areas: reddish brown is from seawater; yellow-orange is from sediments. Line in title block is two miles in length.

A2.0 APPENDIX B. - VENTURA REGIONAL GROUNDWATER MODEL

A2.1 INTRODUCTION

The Ventura Regional Groundwater Model is a tool developed to evaluate multifaceted conjunctive use groundwater management projects designed to alleviate seawater intrusion, overdraft, land subsidence and other problems. These projects include in-lieu use of surface water, shifts in pumping and waste water effluent recycling.

The regional groundwater flow model was originally developed by the U.S. Geological Survey (Hanson et al., 2003) as part of the Regional Aquifer Systems Analysis (RASA), jointly funded by United Water Conservation District and Ventura County Water Resources.

The model is a finite difference numerical model which uses the MODFLOW code. The USGS developed an historical model from 1891 to 1993 and a forward model based on 1970 to 1993 hydrology. The original 2 layer model (Upper Aquifer System and Lower

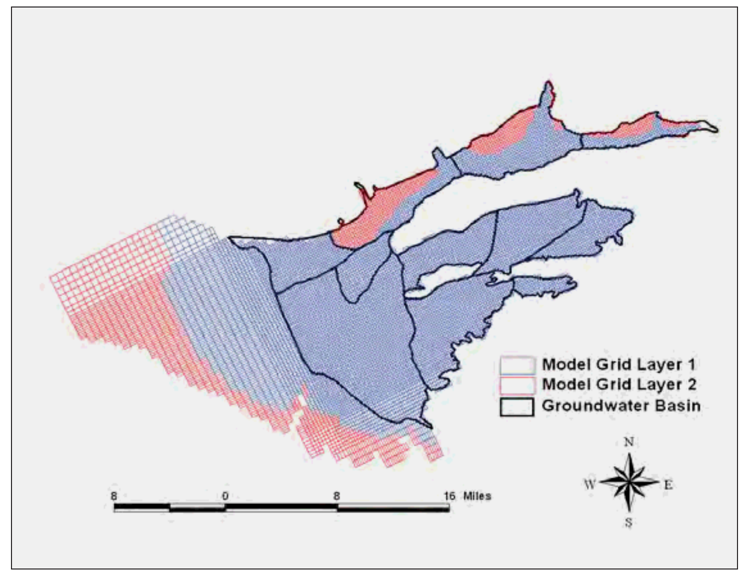

Figure 57. Updated model grid for Ventura Regional Groundwater Model.

Aquifer System) consists of a grid that contains 60 rows and 110 columns for a total of 6,600 cells (Figure 57). Within each cell a groundwater level can be computed. Volume amounts of flow can be computed from cell to cell, basin to basin and from layer to layer. The groundwater basins within the model include Piru, Fillmore, Santa Paula, Mound, Oxnard Plain Forebay, Oxnard Plain, Pleasant Valley, East Las Posas, West Las Posas, South Las Posas, and Santa Rosa.

Water resource inputs to the model include stream flow, artificial recharge, onshore flow, effluent recharge, recharge on permeable mountain front outcrops, rainfall infiltration on the valley floor, and groundwater storage within the permeable sand and gravel aquifers. Water resource outputs include offshore flow and pumping.

The United Water Conservation District has recently modified the groundwater model. The modifications include the following:

- Model was put on user friendly *Groundwater Vistas* platform. This eliminates having to run the model in DOS.
- Refinement of cell size from 1/2 mile x 1/2 mile to 1/6 mile x 1/6 mile for the alluvial basins. This, for example, enables the artificial recharge water to more accurately be input to the appropriate area instead of overlapping into the river.
- Reduction in grid size. In the original USGS model only 28% of the grid cells are active. In the modified model 47% of grid cells are active (ETIC, 2003).
- Extension of the historical and forward model to include 1994 to 2000 hydrology.
- Addition of a zone of lower hydraulic conductivity in the Lower Aquifer System extending in a linear trend from the Camarillo Hills anti-cline to Port Hueneme. This is to simulate the maximum uplift and truncation of the more permeable upper portion of the Lower Aquifer System along this linear trend.
- Addition of an additional layer in the upper basins of Piru, Fillmore, and Santa Paula to better simulate the more permeable alluvium along the Santa Clara River, Sespe Creek, Santa Paula Creek and Piru Creek.
- Recalibration of the Forebay and Oxnard Plain portions of the model over the period 1983 to 1998 to reflect the increased diversions and recharge that have occurred in this area since the USGS originally calibrated the model (UWCD, 2006b).
- Expansion of the forward model period to a full 55 years that reflect the climate and hydrology of the years 1944 to 1998. This period is a commonly-used base period because it starts and ends in very wet years, spans several wet and dry cycles, and represents zero cumulative departure for rainfall across the period.

The regional groundwater flow model has been used in the following projects and analyses:

- Oxnard Plain LAS and UAS overdraft analysis – UWCD (2001)
- GREAT Project EIR – UWCD and City of Oxnard
- Las Posas Basin ASR project operations – Calleguas MWD
- City of Fillmore water supply planning – UWCD and City of Fillmore
- Pleasant Valley AB303 grant study – UWCD
- Fox Canyon Groundwater Management Agency Groundwater Management Plan – UWCD and FCGMA

A2.2 MODELING FOR THE FCGMA GROUNDWATER MANAGEMENT PLAN

The Ventura Regional Groundwater Model was used to evaluate all FCGMA management strategies that change the water budget within the FCGMA – that is, all projects that have recharge and/or groundwater pumping components. The model is a groundwater flow model, not a chemical transport model, so water quality changes could not be directly tested. However,

water quality changes could be inferred from the groundwater flows and groundwater elevations in cases such as seawater intrusion – we know how high groundwater elevations need to be at the coastline to prevent seawater from intruding into the aquifers.

The method of evaluation of management strategies was straightforward:

1) First, the forward model was used to determine conditions in the aquifer using only existing strategies and facilities (Base Case).

2) Each strategy was independently added to the Base Case and was run through the forward model (one model run for each strategy). A final model simulation combined all the strategies to determine if together they could solve the overdraft conditions. For ease of evaluation, it was assumed that the new strategy was in place at the beginning of the model period and remained in place for the entire model period.

3) Groundwater elevation results for all the time steps within the forward model were extracted for each of the wells for which there are water-level BMOs. Water levels at the BMO wells were compared between the Base Case and the individual management strategy to determine the effect of the strategy in meeting water-level BMOs.

A2.2.1 Base Case

The Base Case included strategies and facilities currently in place. Although the hydrology of the 55 years of the forward model is based on historical data, several other model inputs are different than they were during the historic period. For instance, the Freeman Diversion allows greater diversions now than were possible before it was constructed; these additional diversions are factored into the forward model. Likewise, groundwater extractions have been reduced during the past 15 years and the forward model must reflect these changes. To calculate the correct extractions for the forward model, the 55-year period was divided into dry, average, and wet years depending upon historical rainfall and stream flow for each model year. There were roughly equal numbers of dry, average, and wet years in the model. Representative data for dry, average, and wet years were used to approximate pumping during the model period; the representative pumping included only the previous 15 years since FCGMA pumping has been reduced and was adjusted to reflect the current 15% FCGMA pumping reduction. The average pumping over the 55-year period of the forward model was calculated to be equivalent to the actual average pumping of the past 15 years (adjusted for FCGMA pumping reductions).

The Base Case does not include potential future changes in pumping or recharge – it represents today's social, economic, and water use conditions, but tests the status quo over a range of hydrologic conditions. In this manner, various groundwater management strategies can be modeled and compared to the Base Case <u>with no other changing conditions</u> to complicate the comparison. Additional model simulations could factor in such changes as potential land use conversion (e.g., agriculture to urban), but it is appropriate to have these model simulations separate from the Base Case.

The Base Case is the starting point for each of the management strategies that were evaluated with the model. Each simulation discussed below simply adds the new management strategy to the Base Case for comparison. The only exception is the Combined Strategies simulation, where all the modeled strategies are combined in a single simulation.

Base Case Evaluation	Upper Aquifer	Lower Aquifer
BMO Avg (ft msl)	5.3	17.6
Base Case		
Avg (ft msl)	3.7	-40.0
% of Time Above BMO	51%	5%

Table 10. Results of Base Case groundwater model simulation. Groundwater elevations are averages for Upper and Lower Aquifer wells for which there is a groundwater elevation BMO. Also indicated is the percentage of time (weekly time steps) that groundwater elevations were above the BMO elevation for each BMO well.

A2.2.2 Sensitivity Analysis – Understatement of Reported Extractions

Concerns have been voiced that pumping reported to the FCGMA may be understated by agricultural irrigators because of either poorly-calibrated water meters or inaccuracies in using other reporting methods. To test the effect of understated pumping on modeling results, the Base Case was modified to increase agricultural pumping by 15% during all hydrologic conditions (i.e., wet, average, and dry model years). This modified simulation yielded lower groundwater levels, as would be expected (Table 11).

Pumping Sensitivity Analysis	Upper Aquifer	Lower Aquifer
Change in Avg BMO Water Levels (ft)	-7.3	-15.0
Change in % of Time Above BMO	-9%	-3%

Table 11. Change in model results for the Base Case if actual agricultural pumping was increased by 15%. The negative changes indicate that groundwater levels would be lower at BMO wells and the percentage of time that groundwater levels were above BMOs would be less.

The sensitivity analysis indicates that the Base Case modeling results may be overestimating future groundwater levels. However, if the model was recalibrated in the future to correct for any understatement of pumping, it is likely that the results would not look much different than the present Base Case. This would happen because if pumping was increased over the calibration period, then this pumping must be balanced by additional recharge that has not been accounted for. If the re-calibrated model has more recharge, then the increased pumping that would be added to the Base Case would potentially be offset by this increased recharge.

The main conclusion to be drawn from the sensitivity analysis is that the current management strategies for the basin may not be as effective as modeled, but not by any amount that would change conclusions of this Plan. More management strategies are still required, and because most of the modeling effort compares one strategy against another (a comparative rather than an absolute analysis), errors will be relatively small. However, if the meter calibration effort planned by the FCGMA proves that there is indeed understating of pumping, the model should be recalibrated to ensure that errors are marginalized.

A2.2.3 Continuation of 25% Pumping Reduction

This simulation compares attainment of BMOs between current 15% pumping reduction and full 25% pumping reduction. The 15% pumping reduction is the Base Case for the model. Thus, an additional 10% pumping reduction is applied for this comparison simulation. This reduction is applied only to M&I wells because agricultural wells have already taken actions that have reduced pumping in excess of 25% and it is unlikely that any additional steps in changing

irrigation methods will be undertaken before the 2010 date for full implementation of the 25% pumping reductions. .

Pumping for each M&I well in the model is reduced by an additional 10% for the complete model period. This results in 3,800 AFY of reduced pumping across the FCGMA.

The results of this simulation are indicated in Table 12.

25% Reduction Evaluation	Upper Aquifer	Lower Aquifer
BMO Avg Level (ft msl)	5.3	17.6
Base Case		
Avg Level (ft msl)	3.7	-40.0
% of Time Above BMO	51%	5%
25% Pumping Reduction		
Avg Level (ft msl)	4.9	-37.8
Improve from Base Case (ft)	1.2	2.2
% of Time Above BMO	53%	7%

Table 12. Results of groundwater model simulation for the continuation of the 25% FCGMA pumping reduction. Groundwater elevations are averages for Upper and Lower Aquifer wells for which there is a groundwater elevation BMO. Also indicated is the percentage of time (weekly time steps) that groundwater elevations were above the BMO elevation for each BMO well.

A2.2.4 RiverPark Recharge Pits

Compares attainment of BMOs between current recharge operations (Base Case) and the addition of the RiverPark Recharge pits. Using UWCD's daily river routing model, available storm flow that is not already diverted by the Freeman Diversion is diverted to the RiverPark Recharge Pits for percolation and recharge. This additional recharge is generally only available during the winter and spring of wetter years when river flow exceeds UWCD's current recharge capabilities. The amount of recharge water applied in any one quarter to the model for the RiverPark pits is calculated in daily increments through the river routing model, and takes into account both water availability and recharge capacity in the pits. The extra recharge varies from an average of 400 AFY in dry years to an average of 11,500 AFY during wet years.

The results of this simulation are indicated in Table 13.

RiverPark Recharge Evaluation	Upper Aquifer	Lower Aquifer
BMO Avg Level (ft msl)	5.3	17.6
Base Case		
Avg Level (ft msl)	3.7	-40.0
% of Time Above BMO	51%	5%
RiverPark Recharge		
Avg Level (ft msl)	3.7	-40.0
Improve from Base Case (ft)	<0.1	<0.1
% of Time Above BMO	52%	6%

Table 13. Results of groundwater model simulation for the RiverPark Recharge project. Groundwater elevations are averages for Upper and Lower Aquifer wells for which there is a groundwater elevation BMO. Also indicated is the percentage of time (weekly time steps) that groundwater elevations were above the BMO elevation for each BMO well.

A2.2.5 GREAT Project

This simulation compares attainment of BMOs between current basin operations (Base Case) and the addition of the GREAT project. This simulation was performed in two parts to reflect the two phases of the project that were evaluated in the City of Oxnard's EIR for the project. Although the project phases are in reality scheduled sequentially, the model simulates each phase separately to determine the effectiveness of each. For model purposes, Phase I includes 5,000 AFY of reclaimed water, with one fourth of the water being injected in the Ocean view area of the south Oxnard Plain during the first quarter of each year when agricultural demand is low, and three fourths of the water delivered to agricultural irrigators within the PTP service area in-lieu of pumping their own wells. The City of Oxnard then retrieves the 5,000 AFY of injection/in-lieu recharge (as storage credits) equally from UWCD's O-H well field in the Oxnard Plain Forebay and the City's Water Yard wells located just outside the Forebay.

The Phase II model simulation includes 21,000 AFY of reclaimed water delivered in the same proportions between direct injection and in-lieu deliveries. However, the area receiving reclaimed water for irrigation is expanded to include the Pleasant Valley County Water District delivery area. In addition, the winter injection is accomplished through a series of barrier wells located along Highway 1 and Hueneme Road. The City of Oxnard then retrieves one-third of the 21,000 AFY of injection/in-lieu recharge (as storage credits) from UWCD's O-H well field in the Oxnard Plain Forebay and two-thirds from the City's own wells located just outside the Forebay.

Phase I Results: The results of this simulation are indicated in Table 1. The 8-foot improvement in Lower Aquifer groundwater levels at BMO wells is partially offset by the drop of less than one foot in Upper Aquifer BMO wells. The average drop in groundwater levels in the Oxnard Plain Forebay basin resulting from the extraction of the FCGMA credits is 2 to 3 feet.

GREAT Project Phase I Evaluation	***Upper Aquifer***	***Lower Aquifer***
BMO Avg Level (ft msl)	5.3	17.6
Base Case		
Avg Level (ft msl)	3.7	-40.0
% of Time Above BMO	51%	5%
GREAT Project Phase I		
Avg Level (ft msl)	3.4	-31.9
Improve from Base Case (ft)	-0.3	8.1
% of Time Above BMO	51%	9%

Table 1. Results of groundwater model simulation for Phase I of the GREAT project at full capacity. Groundwater elevations are averages for Upper and Lower Aquifer wells for which there is a groundwater elevation BMO. Also indicated is the percentage of time (weekly time steps) that groundwater elevations were above the BMO elevation for each BMO well.

Phase II Results: The results of this simulation are indicated in Table 15. The 38-foot improvement in Lower Aquifer groundwater levels at BMO wells is partially offset by the one-foot drop in Upper Aquifer BMO wells. The average drop in groundwater levels in the Oxnard Plain Forebay basin resulting from the extraction of the FCGMA credits is 6 to 11 feet.

GREAT Project Phase II Evaluation	***Upper Aquifer***	***Lower Aquifer***
BMO Avg Level (ft msl)	5.3	17.6
Base Case		
Avg Level (ft msl)	3.7	-40.0
% of Time Above BMO	51%	5%
GREAT Project Phase II		
Avg Level (ft msl)	2.6	-1.5
Improve from Base Case (ft)	-1.1	38.5
% of Time Above BMO	51%	36%

Table 15. Results of groundwater model simulation for Phase II of the GREAT project at full capacity. Groundwater elevations are averages for Upper and Lower Aquifer wells for which there is a groundwater elevation BMO. Also indicated is the percentage of time (weekly time steps) that groundwater elevations were above the BMO elevation for each BMO well.

A2.2.6 Shift Some Pumping From LAS to UAS

This simulation compares attainment of BMOs between current basin operations (Base Case) and the shifting of some pumping from the Lower Aquifer back to the Upper Aquifer in critical areas. For purposes of the model scenario, pumping is shifted only in the area of the Oxnard Plain basin where Lower Aquifer groundwater levels are well below sea level (southwest of the zone of low conductance that extends from the Camarillo Hills to Port Hueneme). Actual FCGMA policy might vary from this, but the model run demonstrates the effect of this policy change in a discrete area. In the simulation, 5,000 AFY of Lower Aquifer System pumping is moved to nearby Upper Aquifer System wells (or new UAS wells if necessary). There is no shift in pumping in areas where UAS water quality is not suitable for irrigation.

The results of this simulation are indicated in Table 16.

LAS to UAS Evaluation	***Upper Aquifer***	***Lower Aquifer***
BMO Avg Level (ft msl)	5.3	17.6
Base Case		
Avg Level (ft msl)	3.7	-40.0
% of Time Above BMO	51%	5%
LAS to UAS Shift		
Avg Level (ft msl)	2.6	-31.8
Improve from Base Case (ft)	-1.1	8.2
% of Time Above BMO	50%	9%

Table 16. Results of groundwater model simulation for shifting 5,000 AFY of pumping from the Lower to the Upper Aquifer in the south Oxnard Plain basin. Groundwater elevations are averages for Upper and Lower Aquifer wells for which there is a groundwater elevation BMO. Also indicated is the percentage of time (weekly time steps) that groundwater elevations were above the BMO elevation for each BMO well.

A2.2.7 Import Additional State Water

This scenario compares attainment of BMOs between current basin operations (Base Case) and the purchase and recharge of additional State Water. For the purposes of this model simulation, an additional 10,000 AF of State Water is purchased during average and dry years, delivered to Lake Piru, and then released down the Santa Clara River as part of UWCD's normal conservation release. The portion of this water that is likely to reach the Freeman Diversion, as calculated separately using UWCD's daily river routing model, is then diverted at the Freeman Diversion and recharged in UWCD's spreading ponds in the Oxnard Plain Forebay basin.

The results of this simulation are indicated in Table 17. Average groundwater levels in the Oxnard Plain Forebay basin would be 4 to 6 ft higher than the Base Case, providing mitigation for other strategies that have a component of pumping additional groundwater from the Forebay.

Import State Water Evaluation	*Upper Aquifer*	*Lower Aquifer*
BMO Avg Level (ft msl)	5.3	17.6
Base Case		
Avg Level (ft msl)	3.7	-40.0
% of Time Above BMO	51%	5%
Import SWP		
Avg Level (ft msl)	5.5	-38.7
Improve from Base Case (ft)	1.8	1.3
% of Time Above BMO	54%	7%

Table 17. Results of groundwater model simulation of importing additional State Water. Groundwater elevations are averages for Upper and Lower Aquifer wells for which there is a groundwater elevation BMO. Also indicated is the percentage of time (weekly time steps) that groundwater elevations were above the BMO elevation for each BMO well.

A2.2.8 Increase Diversions from Santa Clara River

This simulation compares attainment of BMOs between current basin operations (Base Case) and increasing recharge from the Santa Clara River during periods of high storm flow. For purposes of this model simulation, it is assumed that the diversion rate and license of the Freeman Diversion is increased to 1,000 cfs from its current 375 cfs. Thus, during times of high flow, up to 1,000 cfs could be diverted. These additional diversions are recharged at UWCD's facilities according to their unused capacity, as determined by UWCD's daily river routing model. For purposes of the model scenario, it is assumed that the RiverPark recharge facility is available and that the Ferro gravel pit has been converted to use for recharge and storage.

The results of this simulation are indicated in Table 18. Average groundwater levels in the Oxnard Plain Forebay basin would be 6 ft higher than the Base Case, providing mitigation for other strategies that have a component of pumping additional groundwater from the Forebay.

Increase Diversions Evaluation	*Upper Aquifer*	*Lower Aquifer*
BMO Avg Level (ft msl)	5.3	17.6
Base Case		
Avg Level (ft msl)	3.7	-40.0
% of Time Above BMO	51%	5%
Increase Diversions		
Avg Level (ft msl)	6.4	-37.4
Improve from Base Case (ft)	2.7	2.6
% of Time Above BMO	54%	8%

Table 18. Results of groundwater model simulation for increasing diversions from the Santa Clara River. Groundwater elevations are averages for Upper and Lower Aquifer wells for which there is a groundwater elevation BMO. Also indicated is the percentage of time (weekly time steps) that groundwater elevations were above the BMO elevation for each BMO well.

A2.2.9 Additional In-Lieu Deliveries to South Oxnard Plain

This model scenario compares attainment of BMOs between current basin operations (Base Case) and the delivery of additional in-lieu recharge water to the south Oxnard Plain. For purposes of this model simulation, it is assumed that there are 3,000 AFY of in-lieu water available for delivery to irrigation irrigators in the area south of the end of the PTP Pipeline. This in-lieu water delivery is adjusted for changes in quarterly agricultural demand.

The results of this simulation are indicated in Table 19.

In-Lieu S Oxnard Plain Evaluation	*Upper Aquifer*	*Lower Aquifer*
BMO Avg Level (ft msl)	5.3	17.6
Base Case		
Avg Level (ft msl)	3.7	-40.0
% of Time Above BMO	51%	5%
In-Lieu S Oxnard Plain		
Avg Level (ft msl)	4.9	-35.9
Improve from Base Case (ft)	1.2	4.1
% of Time Above BMO	53%	7%

Table 19. Results of groundwater model simulation of delivering additional in-lieu water to pumpers on the southern Oxnard Plain basin. Groundwater elevations are averages for Upper and Lower Aquifer wells for which there is a groundwater elevation BMO. Also indicated is the percentage of time (weekly time steps) that groundwater elevations were above the BMO elevation for each BMO well.

A2.2.10 Shift Some Pumping to Northwest Oxnard Plain

This simulation compares attainment of BMOs between current basin operations (Base Case) and shifting some pumping to the northwest Oxnard Plain from areas less easily recharged. For this model simulation, it is assumed that 2,000 AFY of M&I pumping is moved from the portion of the Oxnard Plain near the Forebay basin to the northwest Oxnard Plain. This pumping is shifted from the City of Oxnard's Water Yard and Blending Station to the area within 2 miles of the ocean along Gonzalez Rd.

The results of this simulation are indicated in Table 20.

Shift NW Oxnard Plain Evaluation	Upper Aquifer	Lower Aquifer
BMO Avg Level (ft msl)	5.3	17.6
Base Case		
Avg Level (ft msl)	3.7	-40.0
% of Time Above BMO	51%	5%
Shift NW Oxnard Plain		
Avg Level (ft msl)	3.9	-39.7
Improve from Base Case (ft)	0.2	0.3
% of Time Above BMO	51%	5%

Table 20. Results of groundwater model simulation of shifting some pumping to the northwestern portion of the Oxnard Plain basin. Groundwater elevations are averages for Upper and Lower Aquifer wells for which there is a groundwater elevation BMO. Also indicated is the percentage of time (weekly time steps) that groundwater elevations were above the BMO elevation for each BMO well.

A2.2.11 Injection of Treated River Water in Overdrafted Basins

This model scenario compares attainment of BMOs between current basin operations (Base Case) and the injection of treated river water into the south Oxnard Plain and Pleasant Valley areas when there are unused river diversions either during the wet portion of the year or during extended times during very wet years. The rate of injection was varied from 1,500 AFY during dry years to 5,000 AFY during wet years. For purposes of this simulation, it is assumed that the injection sites are located both within the PTP system and the Pleasant Valley CWD service area along the deepest portion of LAS pumping depression.

The results of this simulation are indicated in Table 21.

Injecting River Water Evaluation	Upper Aquifer	Lower Aquifer
BMO Avg Level (ft msl)	5.3	17.6
Base Case		
Avg Level (ft msl)	3.7	-40.0
% of Time Above BMO	51%	5%
Injecting River Water		
Avg Level (ft msl)	5.0	-32.6
Improve from Base Case (ft)	1.3	7.4
% of Time Above BMO	53%	11%

Table 21. Results of groundwater model simulation of injecting treated river water in the south Oxnard Plain and Pleasant Valley areas. Groundwater elevations are averages for Upper and Lower Aquifer wells for which there is a groundwater elevation BMO. Also indicated is the percentage of time (weekly time steps) that groundwater elevations were above the BMO elevation for each BMO well.

A2.2.12 Switch Location of City of Camarillo Pumping

To test the effectiveness of moving pumping from near the Camarillo airport to an area along the Arroyo Las Posas (see section 9.3 *Development of Brackish Groundwater, Pleasant Valley Basin*), the pumping from the airport well was eliminated for the model simulation. Model results indicate that the worst portion of the pumping depression would be decreased considerably in size, leaving a smaller depression in the southern Pleasant Valley basin (Figure 58).

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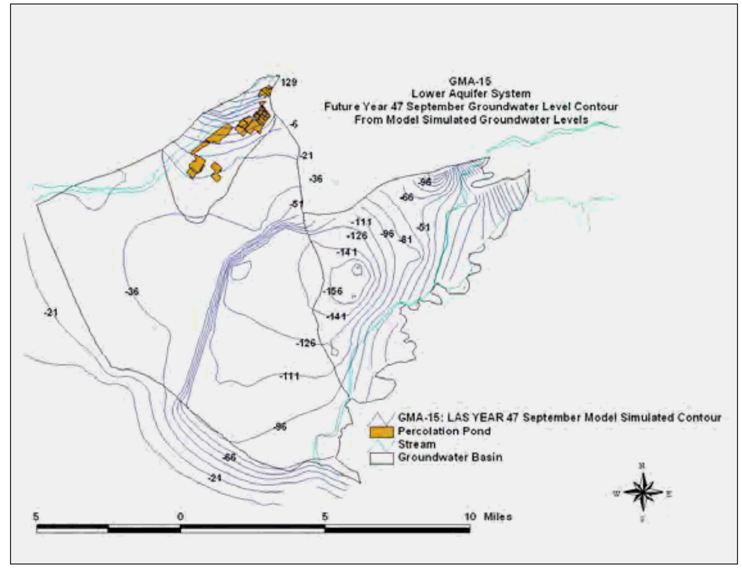

Figure 58. Simulated groundwater elevations for the LAS during the model year corresponding to the 1990 drought year, when the pumping trough beneath Pleasant Valley and the south Oxnard Plain was most pronounced. The elimination of pumping from the City's airport well decreased the size of the northern portion of the pumping depression.

A2.2.13 Full-Time Barrier Wells in South Oxnard Plain

This simulation compares attainment of BMOs between current basin operations (Base Case) and the use of barrier wells in the south Oxnard Plain to build a recharge mound that prevents coastal chloride contamination from moving further inland. The effectiveness of barrier wells was partially tested for the GREAT project. This simulation assumes that there is water available during the entire year for injection – the actual water available would likely be a combination of recycled water and other water sources. To dovetail with the GREAT simulation's winter-only injection scenario, the water available for injection in the barrier wells was modeled at 21,000 AFY, which was injected at a constant rate throughout the year. The barrier wells used in the simulation are identical to the locations of the GREAT Phase II barrier wells along Highway 1 and Hueneme Road.

The results of this simulation are indicated in Table 22.

Barrier Wells Evaluation	***Upper Aquifer***	***Lower Aquifer***
BMO Avg Level (ft msl)	5.3	17.6
Base Case		
Avg Level (ft msl)	3.7	-40.0
% of Time Above BMO	51%	5%
Barrier Wells		
Avg Level (ft msl)	15.2	6.5
Improve from Base Case (ft)	11.5	46.5
% of Time Above BMO	63%	48%

Table 22. Results of groundwater model simulation for a barrier well project in the south Oxnard Plain. Groundwater elevations are averages for Upper and Lower Aquifer wells for which there is a groundwater elevation BMO. Also indicated is the percentage of time (weekly time steps) that groundwater elevations were above the BMO elevation for each BMO well.

A2.2.14 Combined Management Strategies

The management strategies used in the previous simulations were combined in a single model run to determine their overall combined effect in reaching BMOs. This model simulation is an indicator of whether additional management strategies are needed beyond those in this Plan.

The results of this simulation are indicated in Table 23. The most important result is that the combined management strategies allow BMOs to be met 67% of the time in the Upper Aquifer and 76% of the time in the Lower Aquifer. This result suggests that if all the management strategies in the Plan are implemented, the basin would be relatively safe from saline intrusion (see discussion in section 7.0 *Yield of the Groundwater Basins* on level of attainment of BMOs).

Combined Strategies Evaluation	***Upper Aquifer***	***Lower Aquifer***
BMO Avg Level (ft msl)	5.3	17.6
Base Case		
Avg Level (ft msl)	3.7	-40.0
% of Time Above BMO	51%	5%
Combined Strategies		
Avg Level (ft msl)	18.4	59.8
Improve from Base Case (ft)	14.7	99.8
% of Time Above BMO	67%	76%

Table 23. Results of groundwater model simulation of implementing the combination of all the management strategies evaluated using the groundwater model. Groundwater elevations are averages for Upper and Lower Aquifer wells for which there is a groundwater elevation BMO. Also indicated is the percentage of time (weekly time steps) that groundwater elevations were above the BMO elevation for each BMO well.

A3.0 APPENDIX C. EAST LAS POSAS BASIN MANAGEMENT PLAN

During the February 23, 1994 meeting, the Board of Directors of the FCGMA conditionally approved CMWD's Application for the Injection/Storage Facilities in the North Los Posas Basin. (**Note:** The reference to the North Las Posas Basin stems from the FCGMA original Groundwater Management Plan adopted in 1985. The current correct reference is the East Las Posas Basin).

This approval was conditioned upon several factors including but not limited to: (1) a maximum of 20 injection/storage wells registered with the FCGMA; (2) well injection/extraction schedule determined by availability of water and needs of CMWD's customers; (3) continuous injection period well testing and monthly reporting of acre-feet injected/extracted from wells along with water quality analysis for selected constituents to the FCGMA by CMWD; (4) maximum storage limit of 300,000 acre-feet without further approval of the FCGMA; (5) extraction/injection points shall be coterminous, or in proximate vicinity and coordinated with the FCGMA; (6) water stored in such facilities shall be used in Ventura County; (7) CMWD periodic review of the effects of the injection on surrounding basins to ensure no detrimental effect; (8) CMWD shall have an affirmative obligation to mitigate any detrimental effects found; and (9) FCGMA approval standards for the injection/storage wells shall be mandatory. These conditions were memorialized in a July 12, 1994 letter from Lowell Preston, Ph.D., Agency Coordinator, to Eric Berg, Administrator, CMWD (See Appendix C - Exhibit A).

Subsequently to FCGMA's above mentioned approval, CMWD engaged in several years of discussions about groundwater issues in the Las Posas basin with members of the East Las Posas Basin Users Group (the Group) and individual pumpers. This informal Group, which meets every second month, discusses both basin-wide groundwater issues and potential issues related to Calleguas' Las Posas Basin ASR project.

As a result of those discussions, CMWD and the Group developed the East Los Posas Basin Management Plan (ELPBMP). The ELPBMP, which outlines a monitoring program for the injection/storage wells, establishes action levels, sets stakeholder responsibilities for operation of the ASR project by CMWD, and provides for a dispute resolution mechanism between the parties, attempts to manage the ASR project in such a way as to minimize problems and maximize the beneficial use of groundwater within the East Las Posas Basin..

The ELPBMP is attached to the FCGMA Management Plan as Appendix C. It is understood by the parties that the East Las Posas Basin Management Plan will be reviewed and updated regularly as conditions warrant it.

The Plan begins on the following page.

EAST LAS POSAS BASIN MANAGEMENT PLAN

THIS MANAGEMENT PLAN FOR THE EAST LAS POSAS BASIN (the "Plan") is effective as of ______________, 2006, and is created with reference to the following recitals of fact, understandings and intentions:

<u>RECITALS</u>

A. Calleguas Municipal Water District ("Calleguas") operates an Aquifer Storage and Recovery Project ("ASR") for the benefit of its urban, industrial and agricultural water delivery customers in the Las Posas Basin ("Basin") in Ventura County, California.

B. The Basin is identified as a groundwater subsystem within the boundaries of the Fox Canyon Groundwater Management Agency ("GMA").

C. The ASR project stores potable water in the aquifers of the Basin for use during emergencies and drought periods.

D. The Las Posas Basin Pumpers extract groundwater from the Basin for beneficial uses that include agricultural, domestic, urban and industrial uses. The "Las Posas Basin Pumpers" includes members of the Las Posas Basin Users Group and all other persons or entities extracting groundwater from the East Las Posas Basin (within the boundaries of the GMA).

E. Calleguas and the Las Posas Basin Pumpers desire to manage the groundwater basin such that the ASR project and the Las Posas Basin Pumpers' beneficial uses co-exist to the benefit of all.

F. Calleguas has previously entered into an agreement with the GMA for operation of the ASR project ("Calleguas-GMA Agreement"). A copy of the Calleguas-GMA Agreement is attached hereto as Exhibit "A" and incorporated herein by reference. The Calleguas-GMA Agreement describes the general principles within which the ASR project will operate.

G. Pursuant to the Calleguas-GMA Agreement, stored water is credited to the ASR project when Calleguas either injects potable water into the aquifer through wells or when water is delivered by or through Calleguas to the Las Posas Basin Pumpers in lieu of pumping groundwater. The storage credit pursuant to the Calleguas-GMA Agreement remains in the Basin until the stored water is extracted.

H. Calleguas and the Las Posas Basin Pumpers desire to have the GMA incorporate the terms of this Plan into the updated GMA plan.

NOW, THEREFORE, in consideration of the mutual benefits, covenants and promises set forth herein, the Management Plan for the East Las Posas Basin is as follows:

1. **<u>Monitoring Program</u>**. Calleguas will maintain a monitoring program to track changes in groundwater levels and groundwater quality in the Basin. This monitoring program will consist of two parts: (1) a set of four representative key wells spaced throughout the Basin

("baseline key wells") will monitor the overall health of the Basin (Exhibit "B" and identified by State Well number); and (2) a set of monitoring and producing wells on parcels within or adjacent to the ASR project ("local vicinity wells") will monitor the effects of the ASR injection and pumping on the Basin (Exhibit "C").

2. **<u>Report of Results of Monitoring Program</u>**. Calleguas will report results of the monitoring program described in paragraph 1 above in writing to the Las Posas Basin Pumpers at least every six (6) months during noticed meetings of the Las Posas Basin Users Group. In addition, Calleguas will prepare a written report on ASR activities, monitoring results and the state of the Basin annually, and that report will also be made available to the Las Posas Basin Users Group.

3. **<u>Extractions and Storage Credits</u>**. Calleguas covenants and promises that it will only extract water consistent with the Calleguas-GMA Agreement and in an amount which does not exceed Calleguas' storage credits in the Basin, as they may exist at any time. Calleguas will apply for storage credits from the GMA annually based on the amount of water injected and in lieu water delivered that year; the GMA will maintain the storage credit balance for the ASR project and will give written notice to the Las Posas Basin Users Group of the amount of those credits annually and provide a report directly to the Las Posas Basin Users Group every six months as to the amount of storage and extractions which have occurred.

4. **<u>Operation of ASR Project</u>**. Calleguas will operate the ASR project in a manner that does not adversely affect the Basin by creating, by way of example only, chronic declining water levels, increased levels of TDS or chlorides, significant increased pumping lifts, or saline intrusion. It is acknowledged that all currently available information indicates that the Basin may be in overdraft. Although it is not projected that the ASR project will alleviate the overdraft, Calleguas will make a good faith effort to assist the Las Posas Basin Pumpers in reducing the overdraft. Additionally, it is recognized that there is a mound of high-chloride, high-TDS water migrating into the Basin from beneath the Arroyo Las Posas. Calleguas will assist in mitigating this water quality problem by facilitating projects that will pump this poor-quality water, treat it for agricultural and drinking water use and discharge the resulting brine into a regional brine line. To keep Las Posas Basin Pumpers informed of ASR operations, Calleguas will provide a summary sheet of injections and extractions relating to ASR operations at every Las Posas Basin Users Group meeting (held approximately every two months, but no less than 4 times a year). This summary will discuss, among other things, all injection, extraction and in-lieu activities for the two months prior to the meeting. This summary will also be provided to the GMA.

5. **<u>Groundwater Levels</u>**. Calleguas will operate the ASR project in a manner which will not significantly impact Las Posas Basin Pumpers' ability to use groundwater from the Basin. Impacts will be measured on two levels – basin-wide and local. Basin-wide impacts will be measured using the four baseline key wells. Local impacts will be measured using the local vicinity wells.

<u>Basin-Wide Effects</u>: In order to establish groundwater levels that would exist without the ASR project ("baseline"), the USGS Santa Clara-Calleguas MODFLOW groundwater flow model, as updated by United Water Conservation District and Calleguas, will be used in conjunction with the four baseline key wells. The baseline will be established by running the groundwater model every two years using all available actual pumping and hydrologic data for the period, but excluding any ASR injection/extraction operations or water deliveries in-lieu of injection. The first run of the model for purposes of this Plan will be as follows: The modeled "no ASR project" groundwater levels determined as of September 1, 2006, at the four baseline key wells would establish the baseline for the two-year period. If actual measured water levels fall below the baseline in any of the baseline key wells during the applicable two-year period, then the cause of the groundwater level decline below the baseline will be investigated by Calleguas within 45 days of Calleguas learning of the measured water level falling below the baseline. If the water level drop below baseline is determined to be caused by ASR operations, then Calleguas will present a written plan to the Las Posas Basin Pumpers to mitigate the excess drawdown. That written plan will be presented by Calleguas to the Las Posas Basin Users Group no later than 120 days after Calleguas learns that measured water levels are below baseline.

Local Effects: In the vicinity of the ASR injection/extraction wells, it is recognized that groundwater levels will fluctuate depending upon rates of injection/extraction and proximity to the wells. Nearby wells will see groundwater levels rise and pumping lifts decrease during and following injections of stored water. During extractions of stored water, groundwater levels in the vicinity of the extraction may decrease below levels normally seen in nearby wells, with this pumping effect dissipating when extraction is terminated. Calleguas will use all reasonable efforts to insure that nearby wells can continue to be pumped during this extraction period; if lowered water levels create operational problems such as the inability to pump groundwater because groundwater levels are below pump bowls or the pump breaks suction in any nearby well, Calleguas will attempt to assist well owners in mitigating the problem. Such mitigation measures may include, among other things, providing in-lieu water to well owners at prevailing rates.

6. Disputes. If any dispute arises over the effects of the ASR program and this Plan, the specifics of the dispute will first be presented within 45 days of the dispute arising to an advisory group of members of the Las Posas Basin Users Group numbering not less than 5. If the dispute is not resolved within 45 days after submittal to the advisory group, the dispute shall be presented to Calleguas in writing. Calleguas will then, within 45 days of receiving written notice of the dispute, investigate the issues in the dispute, including performing any hydrogeologic investigation where appropriate. The disputing party will not unreasonably withhold access to historic groundwater data known to the party or access to wells for monitoring. Calleguas will, within 120 days, give a written reply to the disputing party which will include results of any hydrogeologic investigation. In the event that the party is not satisfied by this procedure, the disputing party can deliver a copy of the written dispute to the GMA. If the GMA does not resolve the problem to the satisfaction of the disputing party within 120 days of the delivery of a copy of the written dispute to the GMA, then the disputing party can take whatever legal action it deems appropriate.

7. Term. This Plan shall remain in effect so long as the Calleguas-GMA Agreement remains in effect.

8. Existing Water Rights Unaffected. This Plan and the ASR project shall in no way affect or alter existing water rights in the Basin or grant new or additional water rights to Calleguas or the Las Posas Basin Pumpers (other than the specific rights of injection and extraction granted herein). All injections or extractions are done with the knowledge and consent of the Las Posas Basin Pumpers and under no circumstances will any injections or extractions or pumping under this Plan ripen into a claim for prescriptive or superior rights.

9. Condition of Basin. This Plan is made with the express understanding and assumption that the Basin is of such condition that any water injected by Calleguas into the Basin will remain in the Basin until extracted by Calleguas (or by other pumpers). If this

understanding/assumption is determined to be incorrect or determined to be substantially called into question, then **either** Calleguas or the Las Posas Basin Pumpers may immediately proceed to dispute resolution as set forth in Section 6 above.

END OF PLAN

A3.1 **EXHIBIT "A"**

FOX CANYON
GROUNDWATER MANAGEMENT AGENCY

AGENCY COORDINATOR
Lowell Preston, Ph.D.

July 12, 1994

Eric Berg, Projects Administrator
Calleguas Municipal Water District
2100 Olsen Road
Thousand Oaks, CA 91360-6800

SUBJECT: BOARD APPROVAL OF CMWD APPLICATION FOR INJECTION/STORAGE FACILITIES IN NORTH LAS POSAS GROUNDWATER BASIN

Dear Mr. Berg:

At the Board of Directors meeting on February 23, 1994, the Board approved the CMWD application for injection/storage facilities in the North Las Posas Basin. The approval of this application, as provided for under Ordinance 5.3, was subject to the conditions that follow. These conditions include several changes and additions requested by the Board of Directors.

<u>NORTH LAS POSAS BASIN</u>
<u>INJECTION/STORAGE FACILITIES CONDITIONS</u>

1. *The identification, size, depth, well logs and location of wells used for injection/extraction will be registered with the GMA. A maximum of twenty (20) wells all to be permitted by the County of Ventura, Public Works Agency, and registered with the GMA.*

2. *Calleguas will inject/extract on a schedule determined by availability of water to inject and the needs of their customers. The number of acre-feet injected/extracted from each well shall be reported to the GMA monthly. The monthly report shall also include a water quality analysis for the injected water that covers and conforms to the limits listed for the following items:*

a.	*Sodium Adsorption Ratio (SAR) calculated in meq/l as SAR=NA/((CA + Mg)/2)^.5*	≥1≤4	
b.	*Total Dissolved Solids (TDS)* *Electrical conductivity (EC)*	≥100≤800 <1100	*mg/l* *uMHO*
c.	*Chloride (Cl)*	≤120	*mg/l*
d.	*Boron (H_3Bo_3)*	≤1	*mg/l*
e.	*Nitrates*	<45	*mg/l*

(NOTE: These limits are based on University of California research. Should the University reverse these limits, the recommended changes will be incorporated into these conditions.)

800 South Victoria Avenue, Ventura, CA 93009
(805) 654-2088 FAX:(805) 654-3952

Eric Berg
Page Two
July 12, 1994

Testing shall be conducted monthly during periods of continuous injection, prior to beginning an injection of more than one hundred (100) acre-feet (but no more frequently than monthly), and as frequently as necessary when a change in water quality is suspected or known to exist.

3. *The total water in storage at any one time shall not exceed three hundred thousand (300,000) acre-feet (AF) unless approved by the GMA Board of Directors.*

4. *The point of extraction shall be the same as the point of injection or in the near vicinity. Extraction from points other than that of injection may be desirable and shall be coordinated with, and approved by the GMA.*

5. *Water stored by the facility shall be used in Ventura County.*

6. *Calleguas shall periodically review the effects of the injection on surrounding basins to ensure no detrimental effects result from the injection alone or in combination with natural recharge. Should negative effects exist, Calleguas shall take action to mitigate those effects caused by the injection program.*

7. *Should the injected water or conditions deviate from these standards, injection will stop, or not be started until the condition has been corrected.*

If you have any questions regarding this Agency's approval of your project facilities, please call Rick Farnsworth at 654-2327 or myself at 648-9204.

Very truly yours,

Lowell Preston, Ph.D.
Agency Coordinator

RF:vg

3C6Berg

A3.2 EXHIBIT "B"

Key wells will be used to monitor the overall health of the basin (Figure B-1). These wells, which have a long historic monitoring record of groundwater levels, include State Well Numbers 2N/20W-8F1, 2N/20W-9F1, 3N/20W-34G1, and 3N/19W-29K4.

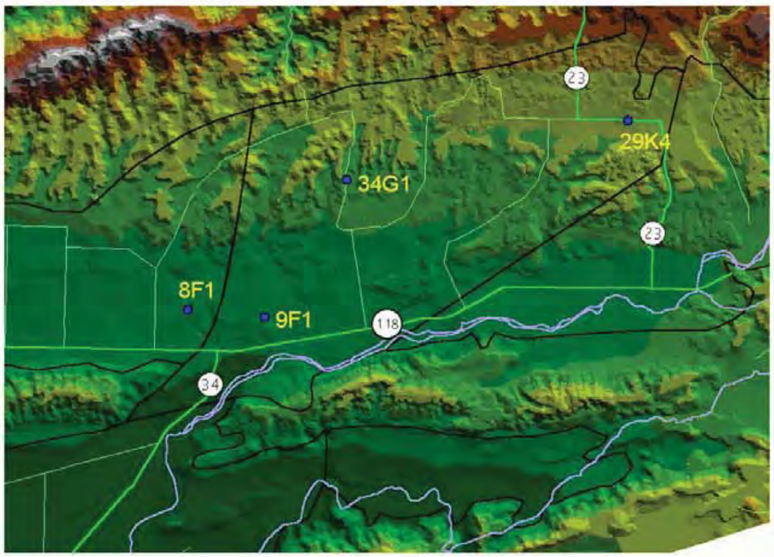

Figure B-1. Key wells in the Las Posas basin.

A3.3 EXHIBIT "C"

Calleguas Municipal Water District will monitor the effects of its Las Posas Basin ASR project using both its ASR wells and additional monitoring points surrounding the ASR project (Figure C-1). These additional monitoring points will consist of existing production wells or, where necessary to complete the area 1 coverage, new monitoring well(s) installed by Calleguas MWD.

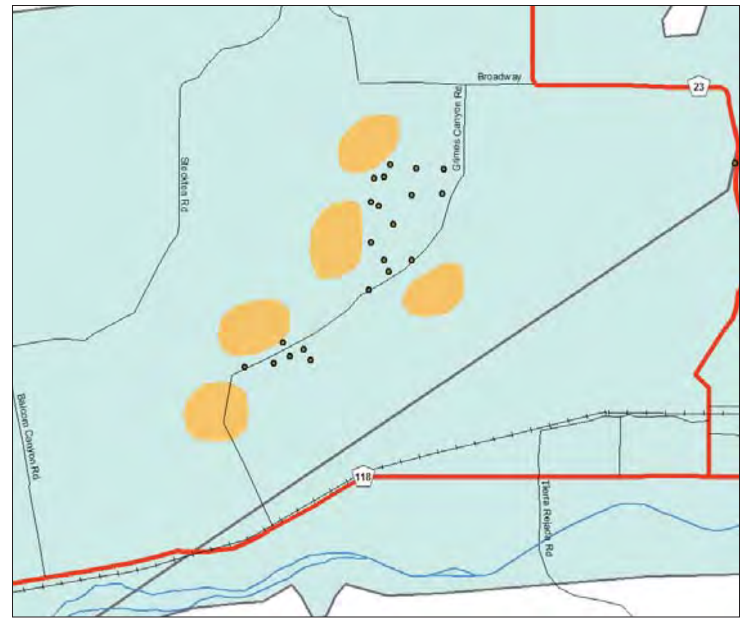

Figure C-1. Locations (indicated by orange circular areas) of monitoring to track the effects of ASR injection and pumping. Dots represent Calleguas MWD ASR wells.

A4.0 APPENDIX D. RESPONSE TO PUBLIC COMMENTS ON THE FCGMA GROUNDWATER MANAGEMENT PLAN

The development of the final FCGMA Groundwater Management Plan involved the release of three separate written drafts between June 2006 and February 2007, presenting the Plan at three public workshops over the same time period, and presenting the Final Plan at a special meeting for the Agency's Board of Directors in March 2007. The Agency accepted public comments throughout the Plan development process.

This section is a compilation of the written public comments to the Plan submitted to the Agency between June 2006 and April 2007. The first part contains a verbatim transcription of each comment and a specific Agency response to each comment. The second part contains a reproduction of the original public comment document.

FCGMA responses to written comments submitted on behalf of the City of Oxnard, City of Camarillo, and Crestview Mutual Water Company (Crestview) by:
Robert J. Saperstein
HATCH & PARENT
A Law Corporation
Santa Barbara, CA

1. Oxnard, Camarillo, and Crestview's Comment: *GMA Board attendance at the workshops. While we understand the time commitment is extensive, this update to the Management Plan is very important. It will guide GMA policy and decision-making for years to come. We are not sure how the GMA Board can obtain adequate familiarity with all the issues and the constituents' concerns without some attendance at the workshops. No board members attended the first workshop.*

Response to Oxnard, Camarillo, and Crestview's Comment #1: This issue was subsequently resolved by the Board member attendance at subsequent workshops and the Special Groundwater Management Plan Workshop held on March 9, 2007. Four Directors and two Alternate Directors were in attendance at this Workshop. Minutes for this meeting have been included in this Appendix (D) to the Groundwater Management Plan.

2. Oxnard, Camarillo, and Crestview's Comment: Executive Summary*. This Section is written as part introduction and part summary. An Executive Summary is normally drafted when the remainder of the document is complete. Given the length and technical nature of the material, the Executive Summary will be the most important Section of the Plan. It may be the only portion of the document many individuals read. It should summarize the purpose, issues and recommendations, once all of the technical work is complete.*

Response to Oxnard, Camarillo, and Crestview's Comment #2: Taking this suggestion, the Executive Summary was put on hold until the final draft. The final version now includes an Executive Summary

3. Oxnard, Camarillo, and Crestview's Comment: Acknowledgements. *Throughout the document, there is repetitive recognition of United and Calleguas as the two entities who contribute to the GMA. This recognition is limited almost exclusively to these two entities. Either this self-congratulatory language should be eliminated, or there should be proper acknowledgement of the work of all the individuals and agencies who have and continue to contribute to the GMA's success.*

Response to Oxnard, Camarillo, and Crestview's Comment #3: The final Fox Canyon Groundwater Management Plan (Plan) acknowledges the contributions many contributors including members of the three sponsoring agencies (Fox Canyon Groundwater Management Agency, United Water Conservation District, Calleguas Municipal Water District) as well as six other stakeholders who provided written comments, reviews, or provided other material input to the completion of the plan. Any other omission of other individual who provided contributions to the completion of the FCGMP is the result of simple oversight.

4. Oxnard, Camarillo, and Crestview's Comment: *Modeling. There needs to be a distinct Section that better describes the model details used for the technical analysis. This Section need not be long, but it should include mention of the software, construction, assumptions and details of the model construct. It ought to give enough information for the technically capable reader to understand its basics.*

Response to Oxnard, Camarillo, and Crestview's Comment #4: There is now a considerable discussion of the modeling approach, assumptions, limitations, and modeling results included as Appendix B of the final FCGMP. While not an exhaustive technical discussion of model development and results, it provides a thorough and meaningful summary of the model approach and its use in the development and analysis of various policies developed in the Plan.

5. ***Oxnard, Camarillo, and Crestview's Comment: Organization and Redundancy.*** *There is tremendous redundancy in the report. Perhaps with different organization, it could be slimmed down significantly. You might describe the water quality and quantity issues generally applicable to all areas, along with the general concept of basin management objectives. Then discuss all the issues comprehensively, separated for each basin or in some cases regions with multiple basins. As an alternative, some of the nonessential background and detailed technical information might be moved to appendices.*

Response to Oxnard, Camarillo, and Crestview's Comment #5: The final Plan has been reorganized and indexed to limit redundancies and improve the organizational structure. Due to the interrelated nature and technical complexity of many of the water quality, water quantity, and public policy issues, some redundancy is necessary to provide the appropriate context for specific topics.

6. ***Oxnard, Camarillo, and Crestview's Comment: Management Strategies: Organization.*** *In a fashion, the Management Plan is really several separate management plans. Perhaps it should be organized by basin for the three content subjects: strategies under development, future strategies and actions to attain BMO's. There may need to be one more general Section that addresses those strategies that cross basin boundaries. You may be able to combine all the basin specific discussions in one Section for each basin. A couple different organizational approaches might be tested, with the goal of, reducing redundancy and volume of text.*

Response to Oxnard, Camarillo, and Crestview's Comment #6: See the response to Oxnard, Camarillo, and Crestview's Comment #5.

7. ***Oxnard, Camarillo, and Crestview's Comment: Specific strategy: Forebay priorities****. The potential over-reliance on the Forebay under certain conditions is acknowledged in the document. However, there is no mention of the importance, from a policy perspective, to establish some hierarchy for use of the Forebay. There will be increasing reliance on the Forebay. To the extent access to the Forebay may be limited under certain conditions; the GMA board must consider limiting certain uses before others.*

Response to Oxnard, Camarillo, and Crestview's Comment #7: As implied by Oxnard, Camarillo, and Crestview's Comment #7, the Plan acknowledges that the Oxnard Plain Forebay Basin represents one of the most significant sources of subsurface storage and recharge within the FCGMA. Specific groundwater management strategies directly involving the use of the Oxnard Plain Forebay Basin have been addressed in Sections 10.1.4, 10.1.5, 10.1.7. Other policy recommendations are addressed in Sections 11.2.2, 11.3.6, and 11.3.7. Through its discussion in these Sections as well as its implicit inclusion other strategies, the Plan acknowledges the significance and challenge of prioritizing use of the Oxnard Plain Forebay Basin. The Oxnard Plain Forebay Basin will remain a source of significant consideration and focus in the development of effective future strategies.

8. ***Oxnard, Camarillo, and Crestview's Comment: Specific strategy: Transfers across basins.*** *There is no direct mention that transfers (of allocation or credits) from challenged areas to areas of abundance may be the simplest method of mitigating problems. This has been a policy not favored in the past. However, this is an appropriate time to reconsider this*

question, particularly if the technical analysis suggests that a surgical approach is required to solve certain problem areas.

Response to Oxnard, Camarillo, and Crestview's Comment #8: Allocation or Credit transfers are now discussed in relation to several strategies that would physically move water from one basin to another, particularly moving credits to the Forebay Groundwater Basin. In addition, many of the listed potential water management strategies move river water or reclaimed water across basins to be used for either in-lieu deliveries that replace groundwater pumping, or for direct groundwater recharge. The fundamental concept of localized management strategies is also discussed in Section 10.1.7.

9. ***Oxnard, Camarillo, and Crestview's Comment: Specific strategy: Ag recycled water use****. The draft Plan acknowledges (assumes) that larger volumes of recycled water will be available for Ag use in the future. The assumption is correct that highly purified recycled water will be available and recycled water use could be a very efficient method of solving several regional problems. However, there is some resistance in the Ag community to take direct use of recycled water. The resistance is not over the quality of the recycled water, but over the required reporting to distributors and product buyers that the crop was grown with recycled water. As long as there is the Ag industry perception that recycled water use may harm the user's competitiveness, recycled water will not be widely accepted. The Board may be able to help influence certain industry groups to alter the current reporting requirements that create these problems for individual users.*

Response to Oxnard, Camarillo, and Crestview's Comment #9: The comment is noted.

10. ***Oxnard, Camarillo, and Crestview's Comment: Analytic Methodology.*** *There appears to be no intent to model the expected (inevitable) conversion of Ag use to M&I use over the period of the modeling run. Without this detail, the modeling exercise may provide very misleading results. For example, there are several significant Ag to M&I projects that are in the planning stages located in the south Oxnard Plain area, nearby the City's wastewater treatment plant and the military bases. The result of these conversions will be a shift in groundwater use from wells in a highly sensitive area, to City and United wells located far from the coast (and imported water). If the model does not take into account these expected transitions, it will predict a materially different future than that which will occur. In this fashion, the modeling results may be very misleading.*

Response to Oxnard, Camarillo, and Crestview's Comment #10: The groundwater modeling purposely kept land use constant through the forward model period to analyze the quantitative effect of different groundwater management strategies (such as 5% reduction of historical allocation or implementation of an injection barrier). A typical model-based quantitative analysis, including the Ventura Regional Groundwater Model (VRGM), alters only one variable at a time to determine its effect on the entire system. Often, if more than one variable is changed, (e.g., adding a management strategy plus changing land use), the quantitative effect of either variables is obscured. The effect of changing land-use was not one of the variables examined in this analysis; however, adding such a scenario would be instructive. As part of the Plan implementation process, this may be one of the recommendations to the Technical Analysis Group (TAG).

11. ***Oxnard, Camarillo, and Crestview's Comment: Water Quality.*** *It is somewhat troubling that the cornerstone of the Plan is the setting of Basin Management Objectives, some of which are water quality objectives. However, the model has no capability to predict water quality changes. Thus, we need to be very careful in how we set and monitor compliance with the Basin Management Objectives.*

Response to Oxnard, Camarillo, and Crestview's Comment #11: It is true that the groundwater model cannot directly predict water quality changes, although there is some capacity to determine the effects of seawater intrusion in coastal areas. In these areas, controlling seawater through management of groundwater elevations is a priority goal and key component of the management plan, and is addressed in Sections 9.1, 10.2.1, and 10.3.1. In other areas, the BMOs are the Regional Board's Basin Plan Groundwater Objectives Other water quality objectives and are discussed in Section 6.1, 9.2, 9.3, 10.1.3, and 10.1.4. In the Forebay basin, nitrate BMO's are set at the Department of Health Services notification level for drinking water. As part of the Plan implementation process, this may be one of the recommendations to the Technical Analysis Group (TAG).

12. Oxnard, Camarillo, and Crestview's Comment: Periodic update. *Either as a component of the Plan, or as a Board measure in adopting the Plan, there should be a built in requirement to update the Plan no less than every 5 years. This should not be so difficult if the model proves to be as useful a tool as is expected.*

Response to Oxnard, Camarillo, and Crestview's Comment #12: This recommendation for periodic reviews and updates are now a strategy and action item in the Plan and is discussed in Section 11.1.3.

13a. Oxnard, Camarillo, and Crestview's Comment: Pg. 12. There is no such thing as "in-lieu'" credits. Ordinance 8 only defines storage and conservation credits. There are special credit transfer agreements/programs the GMA has approved that amount to "in-lieu" transfer of credits, but the term has no meaning in Ordinance 8.

Response to Oxnard, Camarillo, and Crestview's Comment #13a: The reference to "In-Lieu" credits have been eliminated or corrected and the term in-lieu is only used to refer to imported, surface, or reclaimed water that could be used instead of extracted groundwater.

13b. Oxnard, Camarillo, and Crestview's Comment: *Ordinance 8 requires Ag to demonstrate 80% efficiency, based on the individual crops grown. The Plan does not propose tightening the efficiency percentage as a potential method of reducing water use. Also, the current reporting requirements are not clear in requiring that the efficiency calculation is to be based on irrigated acreage, not total owned property. In some cases, the irrigated acreage may be materially smaller than the property footprint. In that circumstance, the user gets a substantial benefit in reporting efficiency based on the property footprint instead of the irrigated acreage.*

Response to Oxnard, Camarillo, and Crestview's Comment #13b: As indicated in Section 11.2.4, an examination of the irrigation efficiency allocation will be undertaken as part of the implementation of the Plan.

13c. Oxnard, Camarillo, and Crestview's Comment: Pgs. 13, 16. *There is no mention of M&I return flows as a source of recharge.*

Response to Oxnard, Camarillo, and Crestview's Comment #13c: Return flows have been added as a nominal potential recharge source, with the caveat this only occurs in some areas. In fact, return flows can only reach the main FCGMA aquifers in a few areas where there is hydrologic continuity between surface uses and these aquifers – elsewhere, it is intercepted by impermeable layers and/or perched aquifers.

13d. Oxnard, Camarillo, and Crestview's Comment: *Two different definitions of basin yield are used and overdraft is not defined.*

Response to Oxnard, Camarillo, and Crestview's Comment #13d: Section 7.0 of the final Plan addresses the concept of Yield of Groundwater Basins, its calculation, and the associated assumptions.

13e. Oxnard, Camarillo, and Crestview's Comment*: The discussion of the decreasing trend of extractions is incomplete and therefore misleading. As to the Ag side: (1) there is no quantification of the reduction of Ag pumping resulting from reduced acreage in production over the past two decades, and (2) there is no recognition that the initial period against which we are measuring reduced usage was a very dry period. During dry periods, Ag groundwater use tends to be greatest. Since those early years, we have been in a generally wet period. Thus, we would expect a natural reduction in Ag groundwater use simply based on the historical hydrology*.

As to the M&I side, there is no quantification of the increase in municipal demand as a result of conversion of Ag use to M&I use. There is no discussion of the relative efficiencies of use of water prior to the imposition of the cutback goals. The implication of the current discussion in the Plan is that Ag has done more than its share and M&I has not. There is insufficient information or analysis for this conclusion or implication. This discussion should either be made complete and correct, or eliminated, especially if policy decisions might be influenced by it.

Response to Oxnard, Camarillo, and Crestview's Comment #13e: The language has been changed to eliminate any implication that M&I has not done its share of water conservation or planned reductions in overall groundwater extractions. An example of ag to urban conversion was also added. The discussion of reduction in pumping does not simply compare the dry years of the base period to the wet years following that period to document reductions in pumping. Instead, extraction in like years were compared (dry to dry, wet to wet), with the comparison included in the discussion of overall FCGMA annual extractions and any changes over time. Therefore, the language on FCGMA pumping reductions remains in the Plan.

13f. Oxnard, Camarillo, and Crestview's Comment: Pg.29. *The discussion of increasing salt concentrations in the Las Posas basins is somewhat conclusory and incomplete. It might help to actually provide the POTW discharge water quality for TDS and chlorides, so that it would be more clear to the reader that the problem is, in fact, generating from aquifer conditions, not discharge water quality.*

Response to Oxnard, Camarillo, and Crestview's Comment #13f: Language was added to point out that chloride concentrations of surface waters (including POTW discharges) were considerably lower than those of the affected aquifer. While it is true that the problem was not generated by the quality of the discharge water, the problem appears to have been created by the increased quantity of discharge water (POTW's plus Simi Valley Groundwater Basin dewatering and increased urban runoff throughout the watershed). The higher stream flows created by these discharges have apparently filled the shallow aquifer above historic levels, which may be dissolving salts in the previously unsaturated portion of the shallow aquifer. The Plan references a report done for Calleguas MWD for a more-detailed discussion of this water quality problem.

FCGMA responses to written comments submitted on behalf of the City of Oxnard by:
Anthony Emmert
Water Resources Manager
City of Oxnard, California

1. Oxnard's Comment: *At the last workshop on the draft Plan, the group discussed the potential that incorrect assumptions about the quantity of groundwater production could result in erroneous outcomes from the model. Indeed, there is substantial anecdotal evidence that groundwater production reporting may be materially incorrect because of inaccurate meters or other faulty reporting mechanisms. For this reason, we recommend that the model be run to assume a band of uncertainty relating to the quantity of groundwater production within FCGMA. Such sensitivity analysis will help verify the integrity of the model results.*

Response to Oxnard's Comment #1: A sensitivity analysis was added to the discussion of model results in Appendix B of the final Plan. Following implementation of the meter calibration program scheduled to begin in mid-2007, it would be prudent to revisit this issue to ensure the model is calibrated with the most accurate extraction data.

2. Oxnard's Comment*: As a related matter, the FCGMA will pursue an aggressive review of meter calibrations over the next several years. However, this process is not scheduled to start until 2007 and it will take three years to complete the first cycle. We recommend that the model be periodically rerun and updated with this new, more accurate production data when it becomes available. In the interim, we recommend that FCGMA staff review suspect accounts and perform a preliminary audit of groundwater production reporting to determine the scope of potential discrepancies.*

Response to Oxnard's Comment #2: Periodic reviews and updates to both the VRGM and the Plan are now a strategy and action item in the Plan (Section 11.3.1). More frequent changes or additions to the Management Plan and/or changes to the model could be performed at the Board's discretion, although additional funding may need to be obtained for such efforts.

The final Plan contains a discussion of verification of extraction reporting as a management strategy as well as a proposed procedure for verification. Verification of extraction reporting coupled with revised model inputs represents a fundamental step to enhancing the accuracy and effectiveness of the model. Both are addressed in the final Plan.
FCGMA staff has, and continues to, work diligently on an ongoing basis to identify, research, and, to the extent practical, correct extraction reporting anomalies. Fundamentally, the current system relies on the honesty, forthrightness, and diligence of individual well operators. Given that the Agency has limited resources, the FCGMA will need to continue to rely on self-monitoring reports from the operators, education efforts highlighting the need for accurate reporting, and the contributions of its member agencies to enable it to capture the most accurate data available.

3. Oxnard's Comment: *The Draft Plan sets forth several potential future management strategies that should be further explored for their potential effectiveness in addressing seawater intrusion and other adverse hydrogeologic conditions. We recommend that the next draft of the Plan prioritize these potential future strategies in terms of their potential effectiveness. We further recommend that the FCGMA develop procedure to apply a cost/benefit analysis to determine which of the prioritized strategies should be implemented.*

Response to Oxnard's Comment #3: The final Plan (October 2006) prioritizes groundwater management strategies as suggested. At the March 2007 special Groundwater

Management Plan Workshop, the FCGMA staff introduced a proposed implementation approach that involves both technical and strategic advisory groups that would work together to evaluate each of the groundwater management strategies on both a technical and a cost/benefit basis. These groups will subsequently provide recommendations to the Board.

4. Oxnard's Comment: *As a general matter, we also encourage the FCGMA to consider more dynamic use of aquifers with dewatered storage space as a potential resource for future conjunctive use programs. Other basins, such as the Chino and Orange County basins, are currently planning and using available dewatered storage space for local and regional conjunctive use programs that yield better water supply reliability and financial benefits to support other necessary basin management programs. The FCGMA could pursue similar programs. There are numerous hydrogeologic and policy matters that must be resolved to implement a large scale groundwater storage program. Still, we recommend that the Plan include additional and more detailed discussion of potential opportunities for active conjunctive use programs within the FCGMA area.*

Response to Oxnard's Comment #4: The final Plan includes several strategies that utilize existing aquifer space for storage including the Oxnard Plain Forebay Basin (Sections 9.6.6, 10.1.5, 10.2.2), the South and East Las Posas Basins (Sections 9.2, 10.1.7, and 10.1.10) and the Pleasant Valley Basin (Sections 9.3, 10.1.7, and 10.1.10) In addition, the use of recycled water for injection is discussed in Section 9.1. Ultimately, the technical and cost/benefit of each of these strategies will have to be evaluated by the advisory group(s) and recommended to the Board for implementation.

FCGMA responses to written comments submitted on behalf of Pleasant Valley County Water District (PVCWD) by:
Mr. John Mathews
Arnold, Bluel, Mathews, & Zirbel, Attorney's at Law, LLP
Oxnard, CA
Legal Counsel for Pleasant Valley County Water District
Camarillo, CA

1. ***PVCWD's Comment:*** *Under the section "Groundwater Extractions", in the third paragraph it refers to increased agricultural efficiencies. We believe that somewhere in this paragraph reference should be made to the fact that extractions from the groundwater may have also decreased because increased yields from the Freeman diversion and the Conejo Creek project.*

Response to PVCWD's Comment #1: A sentence has been added as suggested.

2. ***PVCWD's Comment****:* *On page 43, in the section entitled "Assessment of Basin Management Objectives", in the second paragraph it refers to Basin Management Objectives (BMO's) for groundwater levels in the Pleasant Valley basin. In table 3, it makes reference to Basin Management Objectives in the Pleasant Valley area, but does not set forth what the current levels are, it would be helpful to state the groundwater BMO's.*

Response to PVCWD's Comment #2: Current levels have been added to all the BMO tables.

3. ***PVCWD's Comment:*** *On page 48, under the Section "Contingency Plan for LAS Seawater Intrusion", it states that the GMA staff has developed a contingency plan to address the intrusion of seawater into the LAS. It would be helpful if drafts of that Contingency Plan could be made available for public review.*

Response to PVCWD's Comment #3: As stated in the final Plan (Section 8.1), no formalized Contingency Plan for LAS Seawater Intrusion exists. The original FCGMA Groundwater Management Plan completed in September 1985 contained a list of countermeasures that could be employed either temporarily or for longer periods of time to offset an extreme and threatening loss of fresh water resources. Some of the schemes listed, such as a complete ban on all future LAS wells, forced urban and farm water conservation, or monetary incentives to encourage destruction of LAS wells, have limited feasibility at the present time. Others such as implementing voluntary conservation measures, changing the County Well Ordinance to limit new LAS wells, and additional monitoring efforts either proposed in the current plan or already under development.

4. ***PVCWD's Comment****:* *On page 50, under the Section "Conejo Creek Diversion Project", the last sentence references that over the "net 20 years" that the yield of the diversion might decrease. There obviously is a spelling error there in that the word "net" should be "next". Furthermore, input should be sought from Camrosa Water District to determine whether or not their proposed plans will in fact reduce yield to Pleasant Valley. In discussions with Richard Hajas, it is our understanding that Camrosa's intent is to continue to provide current levels of diverted water to Pleasant Valley and in fact yields may be increased.*

Response to PVCWD's Comment #4: The typo has been corrected. The information in this Section was based on a conversation with Camrosa staff, who emphasized that yields of the Conejo Creek diversion project may not always be available to PVCWD.

5. ***PVCWD's Comment:*** *Under the Section "Great Project (Recycled Water)", the first paragraph makes reference to the delivery of recycled water to the Pleasant Valley area. PVCWD has continued to express their concerns to the City of Oxnard about the suitability of the recycled water for agricultural use. In particular, Pleasant Valley is concerned about the "stigma" that recycled water has in the market place. Many growers are now required to provide information on the source of their irrigation water. In the event that recycled water is used, the agricultural produce is often downgraded.*

   Also, Pleasant Valley has concern about the injection of recycled water into the LAS. Injection into the LAS is discussed on pages 65 and 66 (June 2006 Draft Plan). Because the LAS is the only groundwater source for the PVCWD, Pleasant Valley will closely scrutinize any injection of recycled water into the LAS. We feel that a better alternative to injection would be the transportation of the recycled water to the spreading grounds. This would enhance recharge and remove concerns relative to injection.

Response to PVCWD's Comment #5: The use of reclaimed water, as well as most or all of the proposed strategies will need to be analyzed for both technical feasibility and cost/benefit considerations prior to implementation. At that time, the proposed alternative, as well as other alternatives, will be considered. Indeed, the purpose of the advisory groups proposed by the FCGMA Staff at the March 2007 Special Groundwater Management Plan Workshop is to evaluate both the Plan-proposed and alternative groundwater management strategies.

With respect to the specifics of your proposal, the alternative to injection suggested above has two major drawbacks:

1) Reclaimed water recharged in the spreading grounds is not as quantitatively effective or efficient in recharging the Lower Aquifer on a unit for unit basis as using the water in place of extracted groundwater or injecting water directly into the areas with lowered groundwater levels; specifically, the south Oxnard Plain and Pleasant Valley basins; and

2) Reclaimed water delivered via pipeline to the spreading grounds would trigger a host of California Department of Health Services (DHS) requirements, including a zone surrounding the spreading grounds where no groundwater could be pumped for potable use. The DHS requirements for the spreading grounds with piped reclaimed water could significantly alter United Water's operations of the spreading grounds. Any directly injected recycled water would be subject to existing or future DHS stringent water quality standards for domestic consumption, which are very stringent.

6. ***PVCWD's Comment****:* *Under the Section "Non-Export of FCGMA Water", the last paragraph on that page states "It appears that current ordinances and policies of the FCGMA are sufficient to deal with its export issue." In light of recent issues, the ordinances of the GMA should be reviewed again to make sure that they are adequate to address the export issues. In particular, the enforcement provisions relating to export of "GMA" water should be closely reviewed.*

Response to PVCWD's Comment #6: A discussion about reviewing the sufficiency of current ordinances and policies was added to the Plan in Section 10.1.8.

7. ***PVCWD's Comment****:* *Under the Section "Increase Diversions from Santa Clara River, Potential Effectiveness". the first sentence states "The Santa Clara River remains a primary recharge source for the Oxnard Plain and Pleasant Valley basins." Based upon our understandings of various studies, it is a little misleading to suggest that the Pleasant Valley*

basin gets much recharge from the Santa Clara River. Although there may be some recharge, even that is disputed, it is clear that the amount of recharge is minimal at best.

Response to PVCWD's Comment #7: PVCWD's comment has merit and the corresponding text has been amended to indicate there is some uncertainty with regards to the quantitative contribution of the Santa Clara River to the southern portion of the Oxnard Plain Pressure Basin and the Pleasant Valley Basin. However, the Santa Clara River likely provides significant recharge to the northern Oxnard Plain Pressure Basin. It is probably not accurate to portray the recharge going to Pleasant Valley from the Santa Clara River as "minimal at best." Although recharge to this basin is hampered by the zone of lower conductivity (fault?) that separates it from the Santa Clara River, there is still recharge moving across the zone. The river also alleviates the need for some recharge through the pipeline delivery of surface water as a replacement for extracted groundwater.

8. ***PVCWD's Comment**: Under the section "Shelf Life for Conservation Credits", it is Pleasant Valley's opinion that at the present time there is no need for "sunsetting" of conservation credits. While conservation credits have been built up by not only Pleasant Valley, but other entities, it was the very purpose of allowing for conservation credits so that the credits could be retained and used for future needs. Pleasant Valley sees no present need to "sunset" the conservation credits. Credits would only be used when there was inadequate surface water from the Freeman Diversion and the Conejo Creek Project, and pumping from our wells were insufficient to meet our needs. Putting a shelf life on credits seems to suggest that Pleasant Valley would utilize their credits to over-pump and waste water.*

It is also our opinion that putting a shelf life on credits, will also remove incentives to look for creative water solutions. For example, much of the impetus for Pleasant Valley to participate in the Conejo Creek Project, was the fact that credits would be generated.

Response to PVCWD's Comment #8: Your comments are noted. Currently, there are no restrictions on the use of conservation credits, thus there is significant potential for over-use of the groundwater resource through the conservation credit program. The "sunsetting proposal" has been one of several proposals advanced by FCGMA stakeholders to mitigate the potentially negative consequences of the current credit program. Ultimately, current program will need to be evaluated in the context of the groundwater conditions and other groundwater management strategies to determine its potential benefit/consequences.

FCGMA responses to written comments submitted on behalf of Saticoy Country Club (SCC) by:

Mr. John Powell, Water Committee Representative
Saticoy Country Club

1. ***SCC's Comment:** Continuation of 25% Pumping Reduction. SCC supports all efforts to bring the basins into safe yield and we not only have committed to reduce our overall pumping but we also have committed significant capital resources to increase our efficiencies. As briefly described above we have made a significant efficiency effort already through our infrastructure alterations and water management practices and will continue that effort in the future. As such it is our opinion that to continue the phased reductions to the full 25% reduction (with possible further reductions) only to M&I users is unfair and that the Draft Management Plan Update should either include provisions to reward increases in efficiencies by M&I users and/or to implement additional productive measures to also reduce agricultural pumping. Agricultural users consume far more of the resource and it is completely unfair to place the burden of balancing the basin on the M&I users.*

Response to SCC's Comment #1: Your comments and continuing conservation efforts are very much appreciated. As a point of clarification, the proposed further reductions in groundwater extraction under historical allocation are **not** limited to M & I Operators as suggested by your comment. Other extraction reduction strategies included in the final Plan include a change to the Irrigation Efficiency Calculation (Section 10.1.9) and Additional Water Conservation strategies (Section 10.1.12). A generic discussion of M&I and agricultural conservation efforts has been added the final Plan (Section 4.0).

One of the somewhat surprising conclusions that resulted from the many computer modeling scenarios was that implementation of the remaining two 5% scheduled reductions in Historical Allocations would not eliminate the overuse of groundwater resources within the FCGMA. Thus, reduction of allocation will have to be considered in conjunction with other groundwater management strategies. Ultimately, the responsibility for efficient and effective groundwater use falls on all of the FCGMA stakeholders.

2. ***SCC's Comment: Shelf Life for Conservation Credits.** We understand the potential concerns of accumulating Conservation Credits with no expiration date and that this accumulation effectively has left a large theoretical pumping debt on the aquifers. Sunset provisions may be warranted in many cases. Our initial concerns with this proposed provision alteration is how it may impact different size users and also the potential for removal of credits earned through our continued efficiency improvements.*

Response to SCC's Comment #2: As noted in a response to similar comments, there are no restrictions on the use of conservation credits, thus there is significant potential for over-use of the groundwater resource through the conservation credit program. The "sunsetting proposal" has been one of several proposals advanced by FCGMA stakeholders to mitigate the potentially negative consequences of the current credit program. As part of the implementation of the Plan, both the quantitative contribution and cost/benefit of all groundwater management strategies will be evaluated as part of the development process.

FCGMA responses to written comments submitted on behalf of the City of Camarillo (Camarillo) by:

Ms. Lucia McGovern, Deputy Public Works Director
City of Camarillo

1. ***Camarillo's Comment:*** *Page 58* (of the June 2006 Draft Plan Draft Plan) *indicates the following, "the City of Camarillo is considering a strategy to move some of its current pumping from the area of the LAS pumping depression beneath Pleasant Valley to this area of poorer-quality rising groundwater. Under this plan, the poorer-quality water would be extracted and desalted in a similar manner to the South Las Posas Basin project approved by the FCGMA."*

   Recommended Action: Consider replacing this text with the following, "The City of Camarillo has assessed the feasibility of constructing a Groundwater Treatment Facility that would be located in the Somis Gap area of the Pleasant Valley Basin (Black & Veatch, August 2005). The study determined the project to be technically feasible and would allow Camarillo to halt pumping from an area of the LAS with depressed groundwater levels and instead pump in an area of rising groundwater levels. This plan is similar in nature to the South Las Posas Basin project, which was previously approved by the FCGMA Board and consistent with policy to move pumping to areas of known substantial recharge (i.e., Oxnard Forebay) which will create more storage space for future recharge events. The City of Camarillo proposes to coordinate pumping strategies between various stakeholders in the neighboring sub-basins in order maintain replenishment of the Pleasant Valley Basin."

Response to Camarillo's Comment #1: Some of this language has been added to the final Plan. Parenthetically, moving pumping away from Camarillo's airport wells has been simulated using the Ventura Regional Groundwater Model, with results discussed in Appendix B of the revised report and included in the discussion of this particular management strategy.

As a point of clarification, the Board **has not**, in fact, approved any plan for pumping without allocation in the South Las Posas Basin, although the Board has addressed the potential for consideration of such a plan. Specifically, Resolution 2003-03 states that "an allocation for pumping from the South Las Posas Basin may be changed or altered to accommodate a responsible entity that submits **a plan** to render this groundwater usable"* To date, no specific plan has been approved through ordinance or resolution by the Board.

2. ***Camarillo's Comment****: The majority of the discussion on page 58 focuses on the development of brackish groundwater in the LAS of the Pleasant Valley Basin by means of Camarillo's Groundwater Treatment Facility project. However, the third paragraph awkwardly mixes in a brief discussion of an alternate subject in an area of the Pleasant Valley Basin that is far away from the observed recharge in the Forebay.*

   Recommended Action: Please elaborate on the significance of this paragraph to Camarillo's Groundwater Treatment Facility Project or relocate this paragraph to an alternate location to maintain the continuity of the discussion regarding Camarillo's Groundwater Treatment Facility project which is in the Forebay.

* FCGMA, 2003. Item 4: Minutes of the October 22, 2003 Board Meeting *in: Full Agenda for the December 17, 2003 FCGMA Board Meeting.*

Response to Camarillo's Comment #2: The paragraph has been revised to reflect this comment, however we cannot agree with Camarillo's use of the term "Forebay" when discussing a possible unconfined area near the town of Somis at the northeastern corner of the Pleasant Valley Basin. There is at present, no comprehensive and conclusive evidence to support the concept that this area acts like a "Forebay" from a hydrogeologic standpoint. Further, the use of this term could be misleading when used in context with the rest of the FCGMA Management Plan where "Forebay" refers to the Oxnard Plain Forebay Groundwater Basin adjacent to the northern end of the Oxnard Plain Pressure Groundwater Basin.

3. ***Camarillo's Comment:*** *Page 17 (June 2006 Draft Plan) provides the following description of the Pleasant Valley Basin, "Despite the fault barrier to the west, the LAS is in hydrologic continuity with the adjacent southern portion of the Oxnard Plain Basin, which is the primary recharge source for the Pleasant Valley Basin."*

   Two paragraphs later, the following is stated, "At the northeast edge of the Pleasant Valley basin, where Arroyo Las Posas flows cross the basin boundary, increased flows in the arroyo have apparently percolated directly into the LAS, significantly raising groundwater levels in City of Camarillo wells. This recharge suggests that this portion of the Pleasant Valley Basin is unconfined, contrary to current understanding of the basin. "

   Recommended Action: Consider the following definition of the Pleasant Valley Basin and explanation of recharge sources for this basin:

   Historically it was assumed that the LAS of the Pleasant Valley Basin was relatively confined and received little overall recharge. This assumption was based on the understanding that the primary recharge source for this basin was from the adjacent Oxnard Plain Basin to the south and recharge potential between these basins was low due to the low permeability of the Pleasant Valley Basin aquifer in this region, as well as the presence of a fault barrier in the lower portions of the Oxnard Plain. However, since the early 1990s, water levels have begun to rise in the northern adjacent basins. The City of Camarillo has two existing wells in .the northeast portion of the Pleasant Valley Basin (hereafter called the Somis Area) and these wells confirm that rising water levels in northern adjacent basins directly impact recharge rates, water quality, and water levels in the Somis Area.

   The recharge in the Somis Area (Pleasant Valley Forebay) may be a result of the Saugus Formation being folded upward and subsequently eroding away in the Somis gap area covering the underlying bedrock with a predominantly sandy alluvial layer that allows rapid stream flow percolation. If this theory is correct, it is also likely true that the primary source of recharge for the Pleasant Valley Basin prior to the decline of the water levels in the adjacent northern basins was a forebay in the Pleasant Valley Basin and this primary recharge source is again prevalent due to the recent rise in water levels in the northern basins. It is recommended that additional monitoring and studies be conducted to determine if this theory is correct."

   Figure 1 illustrates the conceptual location of the Pleasant Valley Forebay.

Response to Camarillo's Comment #3: Much of this suggested language has been included in the final Plan (Section 3.0). Section 3.0 significantly revises the text to indicate the degree of uncertainty in this area with respect recharge and hydrogeology. There is agreement that the northern portion of the Pleasant Valley basin south of Somis needs to be better understood and there is significant recharge occurring in this area of the basin. The details of how this recharge impacts the main portion of the Pleasant Valley basin needs further evaluation, with the result of the study integrated into the conceptual geology of the Ventura Regional Groundwater Model.

The term "Pleasant Valley Forebay" is not used for the reasons cited in the response to the previous Camarillo's Comment #2.

4. ***Camarillo's Comment****: Page 58 (June 2006 Draft Plan) indicates the following, "Base flow from the Arroyo Las Posas has migrated completely across the South and East Las Posas Basins and into the northernmost Pleasant Valley Basin, providing a source of* new *recharge to this portion of the Pleasant Valley Basin. Coordination in pumping strategies between the sub-basins is recommended in order to avoid negatively impacting groundwater levels in the Fox Canyon Groundwater Basin." As stated in Camarillo's Comment #3, this may not be a "new" source of recharge but instead reestablishing of an old source of recharge to the Pleasant Valley Basin.*
   Recommended Action: Consider revising the text to indicate that the Somis Gap was potentially the primary recharge source for the Pleasant Valley Basin prior to pumping activities in the northern adjacent basins.

Response to Camarillo's Comment #4: See our response to Camarillo's Comment #3 above. Section 3.0 significantly revises the text to indicate the degree of uncertainty in this area with respect recharge and hydrogeology.

5. ***Camarillo's Comment:*** *The Draft GMP does not segregate the Pleasant Valley Basin into sub-basins, it only describes the basin as a whole. Furthermore, the last sentence of the second paragraph of page 17 (June 2006 Draft Plan) indicates a lack of current understanding of this basin.*
   Recommended Action: Please elaborate on the current understanding of the Pleasant Valley Basin and clarify how the basin is currently handled in the model. It is also recommended that the authors consider sub-dividing the Pleasant Valley Basin into sub-basins (Pleasant Valley Forebay and Pleasant Valley Basin) to assist in evaluating the different potential recharge sources for the basin.

Response to Camarillo's Comment #5: See responses to the previous two Camarillo's Comments.

6. ***Camarillo's Comment****: The second paragraph on page 33 (June 2006 Draft Plan) indicates groundwater levels in the LAS have consistently been below sea level in the Pleasant Valley Basin. This is not true across the entire basin.*
   Recommended Action: Clarify that water levels in the southern portion of Pleasant Valley Basin have historically been below sea level since the 1950's. However, water levels in the northeastern portion of the basin near the Somis gap have historically been above sea level and continue to rise along with levels in the adjacent northern basins.

Response to Camarillo's Comment #6: The text has been amended appropriately in the final Plan.

7. ***Camarillo's Comment****: The last sentence of the second paragraph on page 29 (June 2006 Draft Plan) states that: "It is too early to know whether chlorides in the Pleasant Valley Basin will escalate to a problem affecting local pumpers." This sentence is restated in the third sentence of the second paragraph on page 35. In both places it should be noted that two City of Camarillo wells (Wells A and B) have already been impacted by a rise in chlorides, which has prompted the City to discontinue use of Well A and to blend water from Well B with higher quality imported water to meet drinking water standards.*
   Recommended Action: Revise the referenced sentences to indicate that chloride levels in the southern portion of the basin have risen marginally from rising water levels, but due to limited data, the marginal rise of chloride levels could be much higher. However, as shown on Figure 14 of the draft GMP, sulfate and TDS levels in the northern portion of the Pleasant Valley Basin have been rising steadily and have already exceeded secondary drinking water standards. Available data also indicate that concentrations of iron and manganese are also

rising in response to basin recharge and have risen to levels that impair M&I uses.

Response to Camarillo's Comment #7: The text has been amended appropriately in the final Plan.

8. ***Camarillo's Comment****: Page 35 (June 2006 Draft Plan) provides discussion on increasing sulfate and chloride levels in the northern Pleasant Valley Basin and indicates water treatment will be needed for potable or irrigation use.*
   Recommended Action: Consider expanding the discussion to include the following text:
   "Camarillo has evaluated the feasibility of constructing a Groundwater Treatment Facility that would intercept a portion of the poorer water quality surge and remove salts from the aquifer system. This would help protect the water quality in the southern portion of the basin and preserve higher quality water for use by other pumpers in areas of major overdraft. Furthermore, by utilizing the water from the Groundwater Treatment Facility, Camarillo could curtail or eliminate pumping operations in the southern portion of the Pleasant Valley Basin, which would promote recovery of the depressed water table in that region. Further details of the project are provided in the Section titled, Development of Brackish Groundwater, Pleasant Valley Basin."

Response to Camarillo's Comment #8: Appropriate language has been added to Section 5.2.3 and Section 9.3 of the final Plan. Based on the data and analyses available at this time, it is not known whether a groundwater treatment facility in the northern half of the Pleasant Valley basin would necessarily help to protect water quality in the southern portion of the basin. There is also significant potential for increased pumping associated with a treatment facility to worsen water quality in the southern portion of the Pleasant Valley Basin. Given that there is limited study and data on the area and no quantitative analysis regarding such a system, any statements regarding its success or failure are speculative.

9. ***Camarillo's Comment***: *The second sentence of the last paragraph on page 43 (June 2006 Draft Plan) indicates, "Basin Management Objectives (BMO's) for chloride concentrations in the Pleasant Valley Basin are currently being met, although chlorides are rising slowly in a few wells in the basin."*
   There are a number of wells that indicate that the BMO's are not being met. For example, County data indicate that well 01N/21W-01B04 screened from 820 to 1,150 feet has chloride greater than 200 mg/l, well 01N/21W-03C01 is screened from 956 to 1,216 feet has chloride greater than 260 mg/l, and well 01N/21W-01D02 is screened from 107 to 437 feet with chloride greater than 450 mg/l.
   Recommended Action: Consider revising the statement to indicate that BMO's are not currently being met throughout the entire Pleasant Valley Basin.

Response to Camarillo's Comment #9: The text has been amended appropriately in Section 6.2 of the final Plan.

10. ***Camarillo's Comment****: The first sentence of the last paragraph on page 58·(June 2006 Draft Plan) indicates, "Under current FCGMA policy, City of Camarillo pumping of poor-quality groundwater along Calleguas Creek would have to be pumped using existing allocations if the well was within the FCGMA boundary." The City of Camarillo understands that current FCGMA policy has evolved over time and has previously allowed unrestricted pumping of poorer quality shallow groundwater, with the semi-perched zone in the Oxnard Plain and the South Las Posas along the Arroyo being two examples.*
    Recommended Action: .Consider revising the last paragraph of page 58·(June 2006 Draft Plan) to say: "Previously, City of Camarillo pumping of poor-quality groundwater along Calleguas Creek would have to be pumped using existing allocations since the wells are within the FCGMA boundary. However, as FCGMA policy has evolved over time,

unrestricted pumping of poorer quality shallow groundwater has been allowed. For the Camarillo Project, a coordinated effort between the FCGMA and City of Camarillo should be undertaken to define the potential benefits of operating the City of Camarillo Groundwater Treatment Facility. Extractions of poor-quality water without allocations are discussed in more detail in the Section titled "Recommended Additions to FCGMA Policies."

Response to Camarillo's Comment #10: This comment is addressed in Section 9.3 of the final Plan. A formal written policy that includes criteria for these types of projects is recommended as an addition to FCGMA policies.

With regard to other as aspects of this comment, there are two points of clarification. First, no actual pumping of poor-quality shallow groundwater has been authorizes by the FCGMA to date without an existing allocation. Resolution No. 98-1 provides for construction dewatering without an established allocation since such work is typically short-lived and occurs in the shallow subsurface. Resolution No. 99-3 allowed for unrestricted pumping of "mounded groundwater" within the Oxnard Plain Forebay Basin without an allocation, but only under very specific terms and conditions that to date, have never been met or authorized. Second, the Board **has not**, in fact, approved any plan for pumping without allocation in the South Las Posas Basin although the Board is willing to consider the submittal of a plan. Specifically, Resolution No 2003-03 states that "an allocation for pumping from the South Las Posas Basin may be changed or altered to accommodate a responsible entity that submits a plan to render this groundwater usable"* To date, no specific plan has been approved through ordinance or resolution by the Board.

11. Camarillo's Comment*: The last 3 paragraphs on page 23 (June 2006 Draft Plan) discuss groundwater extraction reduction. The numbers presented in the second paragraph in this Section indicates that the total reduction in pumping is about 22 to 23 percent. The next paragraph indicates that the largest decrease in pumping is from agricultural uses, while the last paragraph indicates that the first phase of the FCGMA enforced pumping reductions of 15 percent resulted in the reduction of 8,300 acre-feet of pumping by the M&I users. However, the discussion on the reduced pumping does not appear to reflect the transfer of allocation from agricultural uses to M&I service, or the fact that while some M&I providers are using all their allocation, others have been conserving them for conjunctive use with other sources. We believe that the apparent 15 percent reduction in pumping is somewhat coincidental and that the overall M&I allocation for groundwater use has increased substantially due to land use conversion.*

Recommended Action: This discussion should compare the changes in acreage irrigated and M&I acreage served over the same time period that pumping reduction has occurred. This may also be the place to discuss the likelihood that under recording meters, or agricultural wells with no meters at all, may be contributing to the apparent reduction in reported agricultural pumping.

Response to Camarillo's Comment #11: The discussion of groundwater extraction has been expanded significantly and is located in Section 4.0 of the final Plan. The issue of potential under-reporting of groundwater extractions is addressed in Section 10.1.6 and Section 11.3.9 of the final Plan. In addition, an additional modeling scenario was performed to address potential under-reporting of groundwater extractions. A discussion of the results is provided in Section A.2.2.2 of Appendix B.

* FCGMA, 2003. Item 4: Minutes of the October 22, 2003 Board Meeting *in: Full Agenda for the December 17, 2003 FCGMA Board Meeting.*

12. Camarillo's Comment*: The second paragraph of page 52 (June 2006 Draft Plan) implies that there is a universal acceptance of the pumping reductions and the stiff penalty for over pumping. The City of Camarillo doesn't agree that there is a universal acceptance of the pumping reductions. It is the City's view, as well as other M&I users, that the reduction is not equitable and recommends that the efficiency policy be reviewed in conjunction with production meter testing activities.*

Recommended Action: Consider revising the text to indicate there may be general acceptance of the pumping reduction policies but not universal agreement. The reduction policies should consider equal distribution in sharing the burden in resolving water level deficits in the basins.

Response to Camarillo's Comment #12: The language has been revised to reflect general, but not universal, acceptance of mandated or scheduled Historical allocation reductions.

13. Camarillo's Comment*: The third paragraph on page 59 (June 2006 Draft Plan) states that the baseline allocation is two acre-feet per acre. The City of Camarillo understands that the two acre-feet per acre may have been the historical allocation, not the baseline allocation. Baseline allocation is only one acre-foot of water per acre, and should be considered when analyzing the baseline allocation policies.*

Response to Camarillo's Comment #13: The baseline allocation number as stated has been corrected to one acre-foot per acre as provided by Section 5.6.1.1 of FCGMA Ordinance No. 8.1.

14. *Camarillo's Comment:* *Page 63 (June 2006 Draft Plan) provides a discussion on the potential effectiveness of importing additional state water. Further clarification of this paragraph would be very helpful in understanding this potential strategy.*

Response to Camarillo's Comment #14: A discussion of the potential effectiveness of importing California State Water is provided in Section 10.2.2 of the final Plan. The potential effects of importing California State Water was also addressed as a model scenario using the VRGM and is discussed in Section A.2.2.7 of Appendix B.

15. Camarillo's Comment: *Page 73 (June 2006 Draft Plan) provides a discussion on penalties used to purchase replacement water. It should be noted that a large percentage of overpumping is by agricultural users who have the ability to escape penalties by switching to irrigation efficiency and consequently the revenue from these fees has historically been very little. Therefore, using this revenue to purchase replenishment water may be of little benefit to the basins.*

Response to Camarillo's Comment #15: The comment is noted.

16. *Camarillo's Comment:* *Page 79 (June 2006 Draft Plan) includes a Section on "Extractions of Poor-Quality Water Without an Allocation", which would be an addition to current FCGMA policy. The City of Camarillo supports such a strategy that allows projects that would benefit the overall aquifer system. The City of Camarillo would like to see this policy implemented and would appreciate the opportunity to review the draft policy.*

Response to Camarillo's Comment #16: Please see the response to Camarillo's Comment #10 above.

17. Camarillo's Comment: *FCGMA has reduced pumping and approved projects that provide some benefit to some portion of aquifers within the agency boundaries. However, this does not promote the implementation of projects in critical areas of the basin that are just outside of agency boundaries. Before implementing the next stage of pumping reductions on M&I users, the City of Camarillo recommends that the FCGMA evaluate larger picture projects* *that could help solve groundwater impacts in the most critical areas and potentially provide solutions in-lieu of additional pumping reductions. Further pumping reductions could possibly be avoided if the current basin by basin management approach was revised and strategies were implemented based on the principal that downstream basins are impacted by upstream uses and that the impact is therefore created by both agricultural and M&I users who pump from all basins.*

FCGMA could consider implementing a "mitigation fee" of approximately $10/AF that would be paid by all groundwater users in the FCGMA. This strategy would allow funding for agencies like UWCD, Oxnard, or Calleguas MWD to develop projects that would effectively improve the conditions of the basins as a whole by moving water to over pumped areas within FCGMA boundaries. This approach would help prevent basin by basin management which could inordinately impact users in downstream basins, like the City of Camarillo.

Response to Camarillo's Comment #17: Section 11.1 of the final Plan proposes that there be a dialog on strategic planning within the water community that would discuss specific projects and project proposals. FCGMA staff has proposed a Plan implementation strategy that not only provides for, but encourages, significant stakeholder contribution and input. There are some inherent limitations to the influence of the FCGMA. The enabling legislation for the FCGMA limits its ability to influence projects and conditions outside its boundary. The opportunity to expend FCGMA funds outside its boundary is also limited.

18. Camarillo's Comment: *The City of Camarillo is under the impression that there is a quantifiable amount of groundwater being exported outside the FCGMA boundary from Pleasant Valley and Las Posas Basins. The City of Camarillo would recommend that FCGMA pursue controlling the exportation of groundwater before additional pumping reductions are approved.*

Response to Camarillo's Comment #18: The exportation of groundwater outside the FCGMA boundary is addressed in Section 9.4.

19. Camarillo's Comment: *The Draft GMP indicates that FCGMA is considering expiring accumulated groundwater credits. It should be noted that M&I users conjunctively balance surface water and imported supplies with local groundwater thereby conserving groundwater for use when surface and imported supply is not available. Therefore, setting a time limit on credits works against this water supply management philosophy. Credit reduction is an issue that should be reviewed separately for M&I uses and agricultural uses. Similar to implementing 25 percent pumping reductions, credit reductions would only impact M&I agencies who conduct long-term planning, since agricultural users could go on efficiency allocation and would not be impacted by a loss of credits. M&I users do not have this option.*

In regards to agricultural credits, please note that UWCD surface water deliveries have in part allowed accumulation of credits by agricultural users that receive surface water for irrigation. Those who funded the Freeman Diversion have in part funded the accumulation of these credits when surface deliveries were annually increased. The credit reduction strategy is believed to be of very little benefit to the overall basins but would have a significant impact to M&I users. If there is a desire to eliminate the perceived "groundwater debt", agricultural credit reduction should be the first consideration.

Pages 71 and 72 (June 2006 Draft Plan) state that there are tens of thousands of acre-feet of accrued conservation credits. The credits that the City of Camarillo has accrued came at a high cost, when we purchase more expensive imported water. Poor quality groundwater has forced the City of Camarillo to blend groundwater with imported supplies, subsequently accruing groundwater credits. The City of Camarillo intends to retain its credits until such time they are needed to meet demands during a drought. Even though credits cannot be

sold, they have a value to M&I users that is equal to the over pumping surcharge. FCGMA should reconsider the proposed strategy of expiring/reducing M&I groundwater credits.

Response to Camarillo's Comment #19: The issue of M&I accrual of credits as well as the "shelf-life" for conservations credits is discussed in extensive detail in Section 10.1.13 of the final Plan.

20. Camarillo's Comment: *Page 73 discusses proper filling and capping of abandoned or leaking wells and states that FCGMA helps with the costs associated with well abandonment. The owner of the land that the well is on should be responsible for costs associated with destruction of well(s).*

Response to Camarillo's Comment #20: It is true the owner of the land is responsible for well destruction. Historically, the City of Oxnard, United Water, and the FCGMA have each provided funding to destroy wells for a variety of reasons including urgency, difficult access, threats to water supply, and inability to find former owners. The Ventura County Watershed Protection District - Groundwater Section has pursued the destruction of 40 to 50 abandoned wells per year over the last several years at the property owner's expense without FCGMA financial assistance.

21. Camarillo's Comment*: Page 75 (June 2006 Draft Plan) provides a discussion of additional reductions in pumping allocations. It is recommended that further reductions not be implemented until after the meter testing effort is complete. Perhaps FCGMA should require an initial testing of all meters within one year. This would be very beneficial to the modeling effort because the model will only be as accurate as the information used to develop it.*

Response to Camarillo's Comment #21: The groundwater management strategy of reducing extraction allocations is discussed in extensive detail in Sections 9.5, 10.4.1, 11.2.1, 11.3.10, and Appendix Section A.2.2.3 of the final Plan. The verification of extraction reporting is discussed in detail in Sections, 10.1.6, 11.3.9, and in Appendix Section A.2.2.2.

Many different and independent analyses performed over the last four years as well as years of historic documentation demonstrate nearly all of the aquifers of the FCGMA are in a state of overdraft. Two FCGMA Staff reports prepared since October 2006, the *FCGMA 2005 Annual Report*, the output of the VRGM (Appendix B to the final Plan), and the UWCD's *2003 Coastal Saline Intrusion Report, Oxnard Plain Ventura County, California* universally identify extraction of groundwater beyond a level the resource can support as the sole reason for depressed groundwater elevations, seawater intrusion, and water quality degradation throughout the FCGMA. Thus, there is an urgent need to implement strategies that both limit use of the resource and provide additional sources of acceptable recharge. While the increased accuracy of extraction reporting may indirectly contribute to better management of the groundwater resource, the overwhelming body of data and analysis supports the conclusion the resource as whole is over-allocated and overused. Delaying the implementation of any strategy that either reduces overuse of the resource or limits the acquisition of additional recharge does not serve either the FCGMA or its stakeholders. Nevertheless, further extraction reduction will be considered in conjunction with other management strategies described in the Plan with the overarching purpose of comprehensively managing the groundwater resource.

FCGMA responses to written comments provided by:
Mr. Lawrence (Larry) Fuller
Land Owner/Well Operator in the FCGMA
Somis, CA

1. ***Fuller's Comment:*** *Examining the FCGMA Management Plan in light of the case CITY OF BARSTOW et al, v. MOJAVE WATER AGENCY (21 August 2000), I believe this case clarifies the California Supreme Court's position on water rights. It is my understanding that the FCGMA used the "equitable" (physical) concept for allocation pumping to all of the Fox Canyon aquifer pumpers. This method of allocation is clearly a violation of the law, if I understand the ruling cited above. The three levels of priority, as stated in the case law, are 1st priority Overlying Owners, 2nd in priority are Appropriators, and 3rd are Exporters. Thus, while the rights of all overlying owners in a groundwater basin are correlative, and subject to cutbacks when the basin is overdrafted, overlying rights are superior to appropriative rights. It is my request that the FCGMA Board of Directors NOT make any further pumping reductions until these legal issues can be resolved. Small water users, Co-ops, and small M&I agricultural systems are not addressed specifically in the Management Plan. In addition, the FCGMA Board has no small operation representative to ensure that their interests and concerns will be heard.*

Response to Fuller's Comment #1: The history and responsibilities of the FCGMA are summarized in Section 2.0 of the final Plan.

The Agency was created by the State Legislature in 1982 [AB 2995] and granted with certain powers and authority to manage groundwater resources. Included in its enabling legislation (now codified as California Water Code Appendix Chapter 121) is the directive to develop, adopt, and implement a plan to control groundwater extractions (Sect 601). It was also granted the power to "Control extractions by regulating, limiting, or suspending extractions form extraction facilities…" [Ch. 121 Sect. 701 (b)]; and the power to "Impose reasonable operating regulations on extraction facilities…"[Ch. 121 Sect. 701(c)]. SB 747 (1991) amended AB 2995 and authorized the FCGMA Board to establish extraction allocations and levy charges for groundwater extraction. Neither the final Plan nor the FCGMA Ordinance No. 8.1 address the issue of water rights, which is beyond the scope of the FCGMA.

The final Plan was prepared to address the future management of the groundwater resource with respect to the needs of all of the FCGMA stakeholders, regardless of size. Since the operational impacts of larger users have a greater impact on the common resource, some priority has necessarily been placed on strategies that effect large-scale extraction or recharge operations. However, almost all of the proposed groundwater management strategies either directly or indirectly affect all users.

With respect to the comment regarding representation, two of the five FCGMA Board positions are established to represent agricultural operators and small water districts.

2. ***Fuller's Comment:*** *According to my understanding, the Calleguas Municipal Water District (CMWD) has been allowed to acquire Fox Canyon aquifer prescriptive pumping rights. The Board has already allowed the injection wells to be drilled and injection of imported water is progressing. It is imperative that CMWD be restricted in writing that they will not be allowed to extract water outside of their injection field.*

Response to Fuller's Comment #2: A discussion of the Las Posas Basin ASR project as well as other proposed aquifer storage projects, a preliminary set of proposed conditions is provided in Section 9.1 and Section 10.1.10 of the final Plan. Specific aspects of the East Las Posas Basin ASR (formerly Identified as the North Las Posas Basin ASR) are provided in Appendix Section A.3.1 of the final Plan.

The FCGMA has no authority in either its enabling legislation or through its Ordinance code to grant prescriptive rights. When the FCGMA Board authorized and approved the East Las Posas Aquifer Storage and Recovery Project (or ASR Program) proposed by CMWD back in February 1994, certain restrictions were placed on both the operational limitations and the water quality alterations that could result. A written list of conditions was attached to the general injection permit authorized by the FCGMA that included but were not limited to volume reporting, monthly water quality reports, water quality restrictions for both imported water and extracted water, total storage limitations, vicinity groundwater conditions reporting requirements, as well as other standards and condition-dependent response actions (Appendix Section A.3.1 of the final Plan). A copy of these standards or conditions is available and included in an official policy sheet entitled "GMA Adoption of Water Quality Standards."

3. ***Fuller's Comment:*** *A gallon for gallon or acre-foot for acre-foot of water injected for water extracted allowance associated with the CMWD ASR field should take into account the wetting factor of the dry sands and the drift factor of the water moving through the aquifer. Fluid losses can be substantial due to wetting of a dry formation and losses via underflow out of the basin or injection area. The FCGMA should not be providing free water to CMWD.*

Response to Fuller's Comment #3: The comment regarding the equity of credits for injected water compared to extracted water is addressed in Section 9.1 and Section 10.1.10 of the final Plan. This is one of the many issues to be considered as part of implementation of all FCGMA groundwater management strategies.

4. ***Fuller's Comment:*** *The court cases cited should be discussed in detail and rights of prescription should be examined as they might apply or effect FCGMA ordinances, processes or procedures especially in light of recent rulings by the court.*

Response to Fuller's Comment #4: The Agency Counsel, supplied to the FCGMA under contract with the County of Ventura, reviews and provides legal counsel to the Staff and the Board for all decisions, Ordinances, and resolutions with respect to County, State, and Federal Codes. Historically, the Agency has also contracted external legal services to provide advice on both policy and legal issues.

File: GMP
Comments Received

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Robert J. Saperstein
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June 22, 2006

Via Electronic Mail

AUG 2006
Received
Fox Canyon GMA

Fox Canyon Groundwater Management Agency
c/o Dr. Steve Bachman
800 South Victoria Avenue, L#1600
Ventura, CA 93009

Re: Comments on Draft Groundwater Management Plan

Dear Steve:

These comments are provided on behalf of the cities of Oxnard and Camarillo, and Crestview Mutual Water Company. Many members of the GMA's M&I Providers Group have also reviewed these comments, but given the short time available, this letter has not been endorsed by any entities other than those listed above.

The M&I Providers group is committed to working with all the interested parties in ensuring that the final, updated GMA Groundwater Management Plan is well-done. The product must be comprehensive, technically well-grounded, and accessible to all the various GMA constituents. This is not a simple task.

GMA staff is also aware that the M&I Provider's Group has hired Curtis Hopkins to provide a peer review of the Management Plan. Curtis and Steve Bachman have already discussed ways in which they might collaborate in making the product meet all our expectations.

The first rough draft presented on June 12, 2006, provides an excellent starting point. Given that this initial draft does not contain the results of the modeling work, these comments are purposely general. When the modeling effort yields results, and the Management Plan is then crafted with more specific recommendations, more specific comments will be provided.

The M&I Providers Group also wanted to express its appreciation for the first workshop conducted on June 15, 2006. It is clear that Steve and the GMA staff have a good plan to ensure that the GMA constituents who chose to be involved will have ample opportunity to influence the content of the plan.

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In no particular order of importance, please consider the following observations and comments regarding the first draft of the Management Plan and the process in getting it completed:

1. GMA Board attendance at the workshops. While we understand the time commitment is extensive, this update to the Management Plan is very important. It will guide GMA policy and decision-making for years to come. We are not sure how the GMA Board can obtain adequate familiarity with all the issues and the constituents' concerns without some attendance at the workshops. No board members attended the first workshop.

2. Executive Summary. This section is written as part introduction and part summary. An Executive Summary is normally drafted when the remainder of the document is complete. Given the length and technical nature of the material, the Executive Summary will be the most important section of the Plan. It may be the only portion of the document many individuals read. It should summarize the purpose, issues and recommendations, once all of the technical work is complete.

3. Acknowledgements. Throughout the document, there is repetitive recognition of United and Calleguas as the two entities who contribute to the GMA. This recognition is limited almost exclusively to these two entities. Either this self-congratulatory language should be eliminated, or there should be proper acknowledgement of the work of all the individuals and agencies who have and continue to contribute to the GMA's success.

4. Modeling. There needs to be a distinct section that better describes the model details used for the technical analysis. This section need not be long, but it should include mention of the software, construction, assumptions and details of the model construct. It ought to give enough information for the technically capable reader to understand its basics.

5. Organization and Redundancy. There is tremendous redundancy in the report. Perhaps with different organization, it could be slimmed down significantly. You might describe the water quality and quantity issues generally applicable to all areas, along with the general concept of basin management objectives. Then discuss all the issues comprehensively, separated for each basin or in some cases regions with multiple basins. As an alternative, some of the nonessential background and detailed technical information might be moved to appendices.

6. Management Strategies: Organization. In a fashion, the Management Plan is really several separate management plans. Perhaps it should be organized by basin for the three content subjects: strategies under development, future strategies and actions to attain BMO's. There may need to be one more general section that addresses those strategies that cross basin boundaries. You may be able to combine all the basin specific discussions in one section for each basin. A couple different organizational approaches might be tested, with the goal of reducing redundancy and volume of text.

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7. Specific strategy: Forebay priorities. The potential over-reliance on the Forebay under certain conditions is acknowledged in the document. However, there is no mention of the importance, from a policy perspective, to establish some hierarchy for use of the Forebay. There will be increasing reliance on the Forebay. To the extent access to the Forebay may be limited under certain conditions; the GMA board must consider limiting certain uses before others.

8. Specific strategy: Transfers across basins. There is no direct mention that transfers (of allocation or credits) from challenged areas to areas of abundance may be the simplest method of mitigating problems. This has been a policy not favored in the past. However, this is an appropriate time to reconsider this question, particularly if the technical analysis suggests that a surgical approach is required to solve certain problem areas.

9. Specific strategy: Ag recycled water use. The draft Plan acknowledges (assumes) that larger volumes of recycled water will be available for Ag use in the future. The assumption is correct that highly purified recycled water will be available and recycled water use could be a very efficient method of solving several regional problems. However, there is some resistance in the Ag community to take direct use of recycled water. The resistance is not over the quality of the recycled water, but over the required reporting to distributors and product buyers that the crop was grown with recycled water. As long as there is the Ag industry perception that recycled water use may harm the user's competitiveness, recycled water will not be widely accepted. The Board may be able to help influence certain industry groups to alter the current reporting requirements that create these problems for individual users.

10. Analytic methodology. There appears to be no intent to model the expected (inevitable) conversion of Ag use to M&I use over the period of the modeling run. Without this detail, the modeling exercise may provide very misleading results. For example, there are several significant Ag to M&I projects that are in the planning stages located in the south Oxnard Plain area, nearby the City's wastewater treatment plant and the military bases. The result of these conversions will be a shift in groundwater use from wells in a highly sensitive area, to City and United wells located far from the coast (and imported water). If the model does not take into account these expected transitions, it will predict a materially different future than that which will occur. In this fashion, the modeling results may be very misleading.

11. Water quality. It is somewhat troubling that the cornerstone of the Plan is the setting of Basin Management Objectives, some of which are water quality objectives. However, the model has no capability to predict water quality changes. Thus, we need to be very careful in how we set and monitor compliance with the Basin Management Objectives.

12. Periodic update. Either as a component of the Plan, or as a Board measure in adopting the Plan, there should be a built in requirement to update the Plan no less than every 5 years. This should not be so difficult if the model proves to be as useful a tool as is expected.

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13. A few detail comments (there are several other nits in the document that we assume will be fixed in future drafts):

a. Pg. 12. There is no such thing as "in-lieu" credits. Ordinance 8 only defines storage and conservation credits. There are special credit transfer agreements/programs the GMA has approved that amount to "in-lieu" transfer of credits, but the term has no meaning in Ordinance 8.

b. Pg. 12. Ordinance 8 requires Ag to demonstrate 80% efficiency, based on the individual crops grown. The Plan does not propose tightening the efficiency percentage as a potential method of reducing water use. Also, the current reporting requirements are not clear in requiring that the efficiency calculation is to be based on irrigated acreage, not total owned property. In some cases, the irrigated acreage may be materially smaller than the property footprint. In that circumstance, the user gets a substantial benefit in reporting efficiency based on the property footprint instead of the irrigated acreage.

c. Pgs. 13, 16. There is no mention of M&I return flows as a source of recharge.

d. Pg. 20. Two different definitions of basin yield are used and overdraft is not defined.

e. Pg. 23. The discussion of the decreasing trend of extractions is incomplete and therefore misleading. As to the Ag side: (1) there is no quantification of the reduction of Ag pumping resulting from reduced acreage in production over the past two decades, and (2) there is no recognition that the initial period against which we are measuring reduced usage was a very dry period. During dry periods, Ag groundwater use tends to be greatest. Since those early years, we have been in a generally wet period. Thus, we would expect a natural reduction in Ag groundwater use simply based on the historical hydrology.

As to the M&I side, there is no quantification of the increase in municipal demand as a result of conversion of Ag use to M&I use. There is no discussion of the relative efficiencies of use of water prior to the imposition of the cutback goals. The implication of the current discussion in the Plan is that Ag has done more than its share and M&I has not. There is insufficient information or analysis for this conclusion or implication. This discussion should either be made complete and correct, or eliminated, especially if policy decisions might be influenced by it.

f. Pg. 29. The discussion of increasing salt concentrations in the Las Posas basins is somewhat conclusory and incomplete. It might help to actually provide the POTW discharge water quality for TDS and chlorides, so that it would be more clear to the reader that the problem is, in fact, generating from aquifer conditions, not discharge water quality.

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The M&I Provider's Group and Curtis Hopkins will continue to be very actively involved in finalizing the Plan. We appreciate the Board's instructions to develop the Plan in an open and interactive environment. Thank you for your consideration of these comments and those that are certain to follow.

Best Regards,

Robert J. Saperstein
For HATCH & PARENT
A Law Corporation

ROB:olr

cc: Board of Directors of Fox Canyon Groundwater Management Agency
Jeff Pratt
David Panaro
M&I Provider's Group

SB 395545 v1:006670.0041

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Received AUG 2006 Fox Canyon GMA

16 August 2006

Transmitted Via Electronic Mail

Fox Canyon Groundwater Management Agency
c/o Dr. Steve Bachman
800 South Victoria Avenue, L#1600
Ventura CA 93009

Subject: Additional Interim Comments on Draft Groundwater Management Plan

Dear Dr. Bachman:

This letter sets forth additional interim general comments on the Draft Fox Canyon Groundwater Management Agency ("FCGMA") Groundwater Management Plan ("Plan") and the current planning process by the City of Oxnard. A draft of this letter and the substantive comments herein were also discussed at the Municipal & Industrial ("M&I") Providers Group meeting on 15 August 2006. Those in attendance expressed their general support for the recommendations set forth below. We will provide more specific comments when the results of the basin model become available. We understand that the modeling results will be available by the end of this month, and that the draft Plan will be amended to include specific recommendations based upon the results. The M&I Provider's Group and its consultant, Hopkins Groundwater Consultants, will need sufficient time to review the model results and the revised draft Plan when available, so that we can provide meaningful comments.

As an interim effort, we are submitting these additional comments to supplement the comments provided by the City of Oxnard and others by letter, dated 22 June 2006. Our additional interim comments are as follows:

1. At the last workshop on the draft Plan, the group discussed the potential that incorrect assumptions about the quantity of groundwater production could result in erroneous outcomes from the model. Indeed, there is substantial anecdotal evidence that groundwater production reporting may be materially incorrect because of inaccurate meters or other faulty reporting mechanisms. For this reason, we recommend that the model be run to assume a band of uncertainty relating to the quantity of groundwater production within FCGMA. Such sensitivity analysis will help verify the integrity of the model results.

Water...Essential to All Life, Past, Present, and Future.

Fox Canyon Groundwater Management Agency
16 August 2006
Page 2

2. As a related matter, the FCGMA will pursue an aggressive review of meter calibrations over the next several years. However, this process is not scheduled to start until 2007 and it will take three years to complete the first cycle. We recommend that the model be periodically rerun and updated with this new, more accurate production data when it becomes available. In the interim, we recommend that FCGMA staff review suspect accounts and perform a preliminary audit of groundwater production reporting to determine the scope of potential discrepancies.

3. The Draft Plan sets forth several potential future management strategies that should be further explored for their potential effectiveness in addressing seawater intrusion and other adverse hydrogeologic conditions. We recommend that the next draft of the Plan prioritize these potential future strategies in terms of their potential effectiveness. We further recommend that the FCGMA develop procedure to apply a cost/benefit analysis to determine which of the prioritized strategies should be implemented.

4. As a general matter, we also encourage the FCGMA to consider more dynamic use of aquifers with dewatered storage space as a potential resource for future conjunctive use programs. Other basins, such as the Chino and Orange County basins, are currently planning and using available dewatered storage space for local and regional conjunctive use programs that yield better water supply reliability and financial benefits to support other necessary basin management programs. The FCGMA could pursue similar programs. There are numerous hydrogeologic and policy matters that must be resolved to implement a large scale groundwater storage program. Still, we recommend that the Plan include additional and more detailed discussion of potential opportunities for active conjunctive use programs within the FCGMA area.

We look forward to viewing the model results and the next iteration of the draft Plan so that we may provide more specific comments. As we noted in our prior letter, we appreciate the open and interactive environment in which this planning effort is being conducted. Thank you for your consideration of these additional interim comments.

Sincerely,

Anthony A. Emmert
Water Resources Manager

cc: Board of Directors, Fox Canyon Groundwater Management Agency
Jeff Pratt
Gerhardt Hubner
David Panaro
M & I Providers Group

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August 16, 2006

Received AUG 2006 Fox Canyon GMA

Mr. David Panaro
Fox Canyon Groundwater
Management Agency
800 S. Victoria Avenue
Ventura, CA 93009

Re: Draft Goundwater Management Plan

Dear David:

Pleasant Valley County Water District ("PVCWD") has reviewed the Fox Canyon Groundwater Management Agency (GMA) Draft Groundwater Management Plan. The staff of the GMA and their consultants are to be congratulated on their efforts in drafting this comprehensive document. We continue to believe that the best way to address our groundwater issues in Ventura County is the consensus building approach that the GMA has always embraced. In our review we have several initial comments. Our comments are made sequentially based upon the GMA draft.

1. On page 23, under the section "*Groundwater Extractions*", in the third paragraph it refers to increased agricultural efficiencies. We believe that somewhere in this paragraph reference should be made to the fact that extractions from the groundwater may have also decreased because increased yields from the Freeman diversion and the Conejo Creek project.

2. On page 43, in the section entitled "*Assessment of Basin Management Objectives*", in the second paragraph it refers to BMOs for groundwater levels in the Pleasant Valley basin. In table 3, it makes reference to Basin Management Objectives in the Pleasant Valley area, but does not set forth what the current levels are, it would be helpful to state the groundwater BMOs.

3. On page 48, under the section "*Contingency Plan for LAS Seawater Intrusion*", it states that the GMA staff has developed a contingency plan to address the intrusion of seawater into the LAS. It would be helpful if drafts of that Contingency Plan could be made available for public review.

Mr. David Panaro
Fox Canyon Groundwater
Management Agency
Re: Draft Goundwater Management Plan
August 16, 2006
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4. On page 50, under the section "*Conejo Creek Diversion Project*", the last sentence references that over the "net 20 years" that the yield of the diversion might decrease. There obviously is a spelling error there in that the word "net" should be "next". Furthermore, input should be sought from Camrosa Water District to determine whether or not their proposed plans will in fact reduce yield to Pleasant Valley. In discussions with Richard Hajas, it is our understanding that Camrosa's intent is to continue to provide current levels of diverted water to Pleasant Valley and in fact yields may be increased.

5. On page 55, under the section "*Great Project (Recycled Water)*", the first paragraph makes reference to the delivery of recycled water to the Pleasant Valley area. Pleasant Valley has continued to express their concerns to the City of Oxnard about the suitability of the recycled water for agricultural use. In particular, Pleasant Valley is concerned about the "stigma" that recycled water has in the market place. Many growers are now required to provide information on the source of their irrigation water. In the event that recycled water is used, the agricultural produce is often downgraded.

   Also, Pleasant Valley has concern about the injection of recycled water into the LAS. Injection into the LAS is discussed on pages 65 and 66. Because the LAS is the only groundwater source for the Pleasant Valley County Water District, Pleasant Valley will closely scrutinize any injection of recycled water into the LAS.

   We feel that a better alternative to injection would be the transportation of the recycled water to the spreading grounds. This would enhance recharge and remove concerns relative to injection.

6. On page 59, under the section "*Non-Export of FCGMA Water*", the last paragraph on that page states "It appears that current ordinances and policies of the FCGMA are sufficient to deal with its export issue." In light of recent issues, the ordinances of the GMA should be reviewed again to make sure that they are adequate to address the export issues. In particular, the enforcement provisions relating to export of "GMA" water should be closely reviewed.

7. On page 63, under the section "*Increase Diversions from Santa Clara River, Potential Effectiveness*", the first sentence states "The Santa Clara River remains a primary recharge source for the Oxnard Plain and Pleasant Valley basins." Based upon our understandings of various studies, it is a little misleading to suggest that the Pleasant Valley basin gets much recharge from the Santa Clara River. Although there may be some recharge, even that is disputed, it is clear that the amount of recharge is minimal at best.

Mr. David Panaro
Fox Canyon Groundwater
Management Agency
Re: Draft Goundwater Management Plan
August 16, 2006
Page 3

8. Beginning on page 71, under the section "*Shelf Life for Conservation Credits*", it is Pleasant Valley's opinion that at the present time there is no need for "sunsetting" of conservation credits. While conservation credits have been built up by not only Pleasant Valley, but other entities, it was the very purpose of allowing for conservation credits so that the credits could be retained and used for future needs. Pleasant Valley sees no present need to "sunset" the conservation credits. Credits would only be used when there was inadequate surface water from the Freeman Diversion and the Conejo Creek Project, and pumping from our wells were insufficient to meet our needs. Putting a shelf life on credits seems to suggest that Pleasant Valley would utilize their credits to over pump and waste water.

   It is also our opinion that putting a shelf life on credits, will also remove incentives to look for creative water solutions. For example, much of the impetous for Pleasant Valley to participate in the Conejo Creek Project, was the fact that credits would be generated.

We appreciate the opportunity to provide our comments concerning the draft, and look forward to the further development of the plan.

Very truly yours,

ARNOLD, BLEUEL, LAROCHELLE,
MATHEWS & ZIRBEL, LLP

John M. Mathews

JMM/ksvk
cc: PVCWD
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August 17, 2006

AUG 2006 Received Fox Canyon GMA

Fox Canyon Ground Water Management Agency
Ventura County Government Center Administration Building
800 South Victoria Avenue
Ventura, California 93009-1600

Attention: Mr. Lynn E. Maulhardt, Chair

Subject: Comments on the Public Review Draft Updated Management Plan dated June, 2006

Dear Mr. Maulhardt:

Saticoy Country Club (SCC) has a vested interest in the proposed changes to the current Fox Canyon Groundwater Management Agency Management Plan (Management Plan Update) but we have not been able to complete our comments in time for the August 21, 2006 deadline for comments. While this letter presents our early thoughts on several issues in the draft Management Plan Update, we intend to continue our effort to prepare comments. Our goal is to have our completed comments shortly after the next FCGMA Groundwater Management Plan Workshop on August 31, 2006. With this schedule we trust our comments will be considered for incorporation in the Final Management Plan Update.

SCC has significantly reduced our water usage through a reduction in irrigated acreage and increased our efficiencies through infrastructure improvements and our water management practices including the following:

- Hired a golf architect to provide a plan to reduce our irrigated acreage from about 117 acres to 95 acres.
- Implemented the 95 acre plan.
- Hired a landscape architect to prepare a drought resistant landscape plan.
- We are in the process implementing the landscape plan.
- Converted many sprinkler heads to more efficient one half head models along the edges of the fairways.
- Rewired each of our sprinkler heads and installed new sprinkler controls for improved individual run time controls.
- We have on-going turf grass studies for additional efficiency improvement.
- A complete irrigation system upgrade evaluation is planned within the next few years.

For the draft Management Plan Update we have identified two areas so far that warrant comments. Those are:

Continuation Of 25% Pumping Reduction

SCC supports all efforts to bring the basins into safe yield and we not only have committed to reduce our overall pumping but we also have committed significant capital resources to increase our efficiencies. As briefly described above we have made a significant efficiency effort already through our infrastructure alterations and water management practices and will continue that effort in the future. As such it is our opinion that to continue the phased reductions to the full 25% reduction (with possible further reductions) only to M&I users is unfair and that the Draft Management Plan Update should either include provisions to reward increases in efficiencies by M&I users and/or to implement additional productive measures to also reduce agricultural pumping.

Agricultural users consume far more of the resource and it is completely unfair to place the burden of balancing the basin on the M&I users.

Shelf Life For Conservation Credits

We understand the potential concerns of accumulating Conservation Credits with no expiration date and that this accumulation effectively has left a large theoretical pumping debt on the aquifers. Sunset provisions may be warranted in many cases. Our initial concerns with this proposed provision alteration is how it may impact different size users and also the potential for removal of credits earned through our continued efficiency improvements.

We look forward to discussions on both of these issues in the workshops.

Sincerely,

John R. Powell, RG, CEG
For the Water Committee

City of Camarillo

601 Carmen Drive • P.O. Box 248 • Camarillo, CA 93011-024

Public Works
(805) 388-5380

August 25, 2006

Mr. Jeff Pratt, P.E.
Executive Officer
Fox Canyon Groundwater Management Agency
800 South Victoria Avenue
Ventura, CA 93009

Subject: Comments to Fox Canyon Groundwater Management Agency Draft Groundwater Management Plan (June 2006)

Dear Jeff,

The City of Camarillo, and its consultants, Black & Veatch and Hopkins Groundwater Consultants, Inc., have reviewed the June 2006 Draft Groundwater Management Plan (Draft GMP) prepared by your agency, and attended two Agency workshops. Based on these interactions, we offer the following comments and recommended actions.

Comments Regarding Development of Brackish Groundwater

The Draft GMP provides discussion in several locations regarding the potential feasibility of the development of the brackish groundwater supply in the northern portion of the Pleasant Valley Basin. The following comments are in regards to this subject.

1. Comment: Page 58 indicates the following, *"the City of Camarillo is considering a strategy to move some of its current pumping from the area of the LAS pumping depression beneath Pleasant Valley to this area of poorer-quality rising groundwater. Under this plan, the poorer-quality water would be extracted and desalted in a similar manner to the South Las Posas Basin project approved by the FCGMA."*

   Recommended Action: Consider replacing this text with the following, *"The City of Camarillo has assessed the feasibility of constructing a Groundwater Treatment Facility that*

would be located in the Somis Gap area of the Pleasant Valley Basin (Black & Veatch, August 2005). The study determined the project to be technically feasible and would allow Camarillo to halt pumping from an area of the LAS with depressed groundwater levels and instead pump in an area of rising groundwater levels. This plan is similar in nature to the South Las Posas Basin project, which was previously approved by the FCGMA Board and consistent with policy to move pumping to areas of known substantial recharge (i.e., Oxnard Forebay) which will create more storage space for future recharge events. The City of Camarillo proposes to coordinate pumping strategies between various stakeholders in the neighboring sub-basins in order maintain replenishment of the Pleasant Valley Basin."

2. Comment: The majority of the discussion on page 58 focuses on the development of brackish groundwater in the LAS of the Pleasant Valley Basin by means of Camarillo's Groundwater Treatment Facility project. However, the third paragraph awkwardly mixes in a brief discussion of an alternate subject in an area of the Pleasant Valley Basin that is far away from the observed recharge in the forebay.

   Recommended Action: Please elaborate on the significance of this paragraph to Camarillo's Groundwater Treatment Facility Project or relocate this paragraph to an alternate location to maintain the continuity of the discussion regarding Camarillo's Groundwater Treatment Facility project which is in the forebay.

3. Comment: Page 17 provides the following description of the Pleasant Valley Basin, *"Despite the fault barrier to the west, the LAS is in hydrologic continuity with the adjacent southern portion of the Oxnard Plain Basin, which is the primary recharge source for the Pleasant Valley Basin."*

   Two paragraphs later, the following is stated, *"At the northeast edge of the Pleasant Valley basin, where Arroyo Las Posas flows cross the basin boundary, increased flows in the arroyo have apparently percolated directly into the LAS, significantly raising groundwater levels in City of Camarillo wells. This recharge suggests that this portion of the Pleasant Valley Basin is unconfined, contrary to current understanding of the basin."*

   Recommended Action: Consider the following definition of the Pleasant Valley Basin and explanation of recharge sources for this basin:

   "Historically it was assumed that the LAS of the Pleasant Valley Basin was relatively confined and received little overall recharge. This assumption was based on the understanding that the primary recharge source for this basin was from the adjacent Oxnard Plain Basin to the south and recharge potential between these basins was low due to the low permeability of the Pleasant Valley Basin aquifer in this region, as well as the presence of a fault barrier in the lower portions of the Oxnard Plain. However, since the early 1990's, water levels have begun to rise in the northern adjacent basins. The City of Camarillo has two existing wells in the northeast portion of the Pleasant Valley Basin (hereafter called the Somis Area) and these wells confirm that rising water levels in northern adjacent basins directly impact recharge rates, water quality, and water levels in the Somis Area.

The recharge in the Somis Area (Pleasant Valley Forebay) may be a result of the Saugus Formation being folded upward and subsequently eroding away in the Somis gap area covering the underlying bedrock with a predominantly sandy alluvial layer that allows rapid stream flow percolation. If this theory is correct, it is also likely true that the primary source of recharge for the Pleasant Valley Basin prior to the decline of the water levels in the adjacent northern basins was a forebay in the Pleasant Valley Basin and this primary recharge source is again prevalent due to the recent rise in water levels in the northern basins. It is recommended that additional monitoring and studies be conducted to determine if this theory is correct."

Figure 1 illustrates the conceptual location of the Pleasant Valley Forebay.

4. Comment: Page 58 indicates the following, *"Base flow from the Arroyo Las Posas has migrated completely across the South and East Las Posas Basins and into the northernmost Pleasant Valley Basin, providing a source of new recharge to this portion of the Pleasant Valley Basin. Coordination in pumping strategies between the sub-basins is recommended in order to avoid negatively impacting groundwater levels in the Fox Canyon Groundwater Basin."* As stated in Comment #3, this may not be a "new" source of recharge but instead reestablishing of an old source of recharge to the Pleasant Valley Basin.

   Recommended Action: Consider revising the text to indicate that the Somis Gap was potentially the primary recharge source for the Pleasant Valley Basin prior to pumping activities in the northern adjacent basins.

5. Comment: The Draft GMP does not segregate the Pleasant Valley Basin into sub-basins, it only describes the basin as a whole. Furthermore, the last sentence of the second paragraph of page 17 indicates a lack of current understanding of this basin.

   Recommended Action: Please elaborate on the current understanding of the Pleasant Valley Basin and clarify how the basin is currently handled in the model. It is also recommended that the authors consider sub-dividing the Pleasant Valley Basin into sub-basins (Pleasant Valley Forebay and Pleasant Valley Basin) to assist in evaluating the different potential recharge sources for the basin.

6. Comment: The second paragraph on page 33 indicates groundwater levels in the LAS have consistently been below sea level in the Pleasant Valley Basin. This is not true across the entire basin.

   Recommended Action: Clarify that water levels in the southern portion of Pleasant Valley Basin have historically been below sea level since the 1950's. However, water levels in the northeastern portion of the basin near the Somis gap have historically been above sea level and continue to rise along with levels in the adjacent northern basins.

7. Comment: The last sentence of the second paragraph on page 29 states that: *"It is too early to know whether chlorides in the Pleasant Valley Basin will escalate to a problem affecting local pumpers."* This sentence is restated in the third sentence of the second paragraph on page 35. In both places it should be noted that two City of Camarillo wells (Wells A and B) have already been impacted by a rise in chlorides, which has prompted the City to discontinue use of Well A and to blend water from Well B with higher quality imported water to meet drinking water standards.

   Recommended Action: Revise the referenced sentences to indicate that chloride levels in the southern portion of the basin have risen marginally from rising water levels, but due to limited data, the marginal rise of chloride levels could be much higher. However, as shown on Figure 14 of the draft GMP, sulfate and TDS levels in the northern portion of the Pleasant Valley Basin have been rising steadily and have already exceeded secondary drinking water standards. Available data also indicate that concentrations of iron and manganese are also rising in response to basin recharge and have risen to levels that impair M&I uses.

8. Comment: Page 35 provides discussion on increasing sulfate and chloride levels in the northern Pleasant Valley Basin and indicates water treatment will be needed for potable or irrigation use.

   Recommended Action: Consider expanding the discussion to include the following text: *"Camarillo has evaluated the feasibility of constructing a Groundwater Treatment Facility that would intercept a portion of the poorer water quality surge and remove salts from the aquifer system. This would help protect the water quality in the southern portion of the basin and preserve higher quality water for use by other pumpers in areas of major overdraft. Furthermore, by utilizing the water from the Groundwater Treatment Facility, Camarillo could curtail or eliminate pumping operations in the southern portion of the Pleasant Valley Basin, which would promote recovery of the depressed water table in that region. Further details of the project are provided in the section titled, Development of Brackish Groundwater, Pleasant Valley Basin."*

9. Comment: The second sentence of the last paragraph on page 43 indicates, *"Basin Management Objectives (BMOs) for chloride concentrations in the Pleasant Valley Basin are currently being met, although chlorides are rising slowly in a few wells in the basin."*

   There are a number of wells that indicate that the BMOs are not being met. For example, County data indicate that 1N/21W-1B04 screened 820 to 1150 feet has chloride greater than 200 mg/l, 1N/21W-3C01 screened 956 to 1216 feet has chloride greater than 260 mg/l, and 1N/21W-1D02 screened 107 to 437 feet has chloride greater than 450 mg/l.

   Recommended Action: Consider revising the statement to indicate that BMOs are not currently being met throughout the entire Pleasant Valley Basin.

10. Comment: The first sentence of the last paragraph on page 58 indicates, *"Under current FCGMA policy, City of Camarillo pumping of poor-quality groundwater along Calleguas*

Creek would have to be pumped using existing allocations if the well was within the FCGMA boundary." The City of Camarillo understands that current FCGMA policy has evolved over time and has previously allowed unrestricted pumping of poorer quality shallow groundwater, with the semi-perched zone in the Oxnard Plain and the South Las Posas along the Arroyo being two examples.

Recommended Action: Consider revising the last paragraph of page 58 to say: *"Previously, City of Camarillo pumping of poor-quality groundwater along Calleguas Creek would have to be pumped using existing allocations since the wells are within the FCGMA boundary. However, as FCGMA policy has evolved over time, unrestricted pumping of poorer quality shallow groundwater has been allowed. For the Camarillo Project, a coordinated effort between the FCGMA and City of Camarillo should be undertaken to define the potential benefits of operating the City of Camarillo Groundwater Treatment Facility. Extractions of poor-quality water without allocations are discussed in more detail in the section titled "Recommended Additions to FCGMA Policies."*

Comments Regarding Further Pumping Reduction Strategies

The Draft GMP includes discussions on the continuation of 25 percent pumping reductions. The M&I users are impacted by reduction strategies while agricultural users are impacted by irrigation efficiency strategies. The actual benefit of the 25 percent pumping reduction is limited because the M&I component of groundwater use (about 30 percent) is significantly less than agricultural uses (about 70 percent) as illustrated in Figures 4 and 5 of the GMP. As a result, this strategy will only ensure a minor reduction in the overall pumping, which will be from the M&I users. This conserved amount could easily be negated by inefficient agricultural practices. Therefore, it is recommended that the 25 percent (or greater) reduction strategies should be reviewed in conjunction with agricultural efficiency calculations. In addition, FCGMA should consider more restrictive crop efficiencies and consider a replenishment fee to be paid by all users.

Specific comments related to pumping reduction strategies are:

11. Comment: The last 3 paragraphs on page 23 discuss groundwater extraction reduction. The numbers presented in the second paragraph in this section indicates that the total reduction in pumping is about 22 to 23 percent. The next paragraph indicates that the largest decrease in pumping is from agricultural uses, while the last paragraph indicates that the first phase of the FCGMA enforced pumping reductions of 15 percent resulted in the reduction of 8,300 acre-feet of pumping by the M&I users. However, the discussion on the reduced pumping does not appear to reflect the transfer of allocation from agricultural uses to M&I service, or the fact that while some M&I providers are using all their allocation, others have been conserving them for conjunctive use with other sources. We believe that the apparent 15 percent reduction in pumping is somewhat coincidental and that the overall M&I allocation for groundwater use has increased substantially due to land use conversion.

Recommended Action: This discussion should compare the changes in acreage irrigated and

M&I acreage served over the same time period that pumping reduction has occurred. This may also be the place to discuss the likelihood that under recording meters, or agricultural wells with no meters at all, may be contributing to the apparent reduction in reported agricultural pumping.

12. Comment: The second paragraph of page 52 implies that there is a universal acceptance of the pumping reductions and the stiff penalty for over pumping. The City of Camarillo doesn't agree that there is a universal acceptance of the pumping reductions. It is the City's view, as well as other M&I users, that the reduction is not equitable and recommends that the efficiency policy be reviewed in conjunction with production meter testing activities.

    Recommended Action: Consider revising the text to indicate there may be general acceptance of the pumping reduction policies but not universal agreement. The reduction policies should consider equal distribution in sharing the burden in resolving water level deficits in the basins.

General Comments on the Draft GMP

The following comments and recommendations are more general in nature:

13. The third paragraph on page 59 states that the baseline allocation is two acre-feet per acre. The City of Camarillo understands that the two acre-feet per acre may have been the historical allocation, not the baseline allocation. Baseline allocation is only one acre-foot of water per acre, and should be considered when analyzing the baseline allocation policies.

14. Page 63 provides a discussion on the potential effectiveness of importing additional state water. Further clarification of this paragraph would be very helpful in understanding this potential strategy.

15. Page 73 provides a discussion on penalties used to purchase replacement water. It should be noted that a large percentage of overpumping is by agricultural users who have the ability to escape penalties by switching to irrigation efficiency and consequently the revenue from these fees has historically been very little. Therefore, using this revenue to purchase replenishment water may be of little benefit to the basins.

16. Page 79 includes a section on *"Extractions of Poor-Quality Water Without An Allocation"*, which would be an addition to current FCGMA policy. The City of Camarillo supports such a strategy that allows projects that would benefit the overall aquifer system. The City of Camarillo would like to see this policy implemented and would appreciate the opportunity to review and comment on the draft policy.

17. FCGMA has reduced pumping and approved projects that provide some benefit to some portion of aquifers within the agency boundaries. However, this does not promote the implementation of projects in critical areas of the basin that are just outside of agency boundaries.

Before implementing the next stage of pumping reductions on M&I users, the City of Camarillo recommends that the FCGMA evaluate larger picture projects that could help solve groundwater impacts in the most critical areas and potentially provide solutions in-lieu of additional pumping reductions.

Further pumping reductions could possibly be avoided if the current basin by basin management approach was revised and strategies were implemented based on the principal that downstream basins are impacted by upstream uses and that the impact is therefore created by both agricultural and M&I users who pump from all basins.

FCGMA could consider implementing a "mitigation fee" of approximately $10/AF that would be paid by all groundwater users in the FCGMA. This strategy would allow funding for agencies like UWCD, Oxnard, or Calleguas MWD to develop projects that would effectively improve the conditions of the basins as a whole by moving water to over pumped areas within FCGMA boundaries. This approach would help prevent basin by basin management which could inordinately impact users in downstream basins, like the City of Camarillo.

18. The City of Camarillo is under the impression that there is a quantifiable amount of groundwater being exported outside the FCGMA boundary from Pleasant Valley and Las Posas Basins. The City of Camarillo would recommend that FCGMA pursue controlling the exportation of groundwater before additional pumping reductions are approved.

19. The Draft GMP indicates that FCGMA is considering expiring accumulated groundwater credits. It should be noted that M&I users conjunctively balance surface water and imported supplies with local groundwater thereby conserving groundwater for use when surface and imported supply is not available. Therefore, setting a time limit on credits works against this water supply management philosophy.

Credit reduction is an issue that should be reviewed separately for M&I uses and agricultural uses. Similar to implementing 25 percent pumping reductions, credit reductions would only impact M&I agencies who conduct long-term planning, since agricultural users could go on efficiency allocation and would not be impacted by a loss of credits. M&I users do not have this option.

In regards to agricultural credits, please note that UWCD surface water deliveries have in part allowed accumulation of credits by agricultural users that receive surface water for irrigation. Those who funded the Freeman Diversion have in part funded the accumulation of these credits when surface deliveries were annually increased.

The credit reduction strategy is believed to be of very little benefit to the overall basins but would have a significant impact to M&I users. If there is a desire to eliminate the perceived "groundwater debt", agricultural credit reduction should be the first consideration.

Pages 71 and 72 state that there are tens of thousands of acre-feet of accrued conservation credits. The credits that the City of Camarillo has accrued came at a high cost, when we purchase more expensive imported water. Poor quality groundwater has forced the City of Camarillo to blend groundwater with imported supplies, subsequently accruing groundwater credits. The City of Camarillo intends to retain its credits until such time they are needed to meet demands during a drought. Even though credits cannot be sold, they have a value to M&I users that is equal to the over pumping surcharge.

FCGMA should reconsider the proposed strategy of expiring/reducing M&I groundwater credits .

20. Page 73 discusses proper filling and capping of abandoned or leaking wells and states that FCGMA helps with the costs associated with well abandonment. The owner of the land that the well is on should be responsible for costs associated with destruction of well(s).

21. Page 75 provides a discussion of additional reductions in pumping allocations. It is recommended that further reductions not be implemented until after the meter testing effort is complete. Perhaps FCGMA should require an initial testing of all meters within one year. This would be very beneficial to the modeling effort because the model will only be as accurate as the information used to develop it.

The City of Camarillo requests the opportunity to provide additional comments once the groundwater modeling effort for the GMP is available for review. The City believes it would be valuable if the GMP provided more quantifiable measures regarding water level deficits and anticipated impacts each FCGMA strategy would contribute towards reducing those deficits. However, the City recognizes that those quantifiable measures would much easier to identify once the modeling results are available.

Please contact me at (805) 388-5334 if you have any questions or need additional information.

Very truly yours,

City of Camarillo

Lucia McGovern

Lucia McGovern
Deputy Director of Public Works

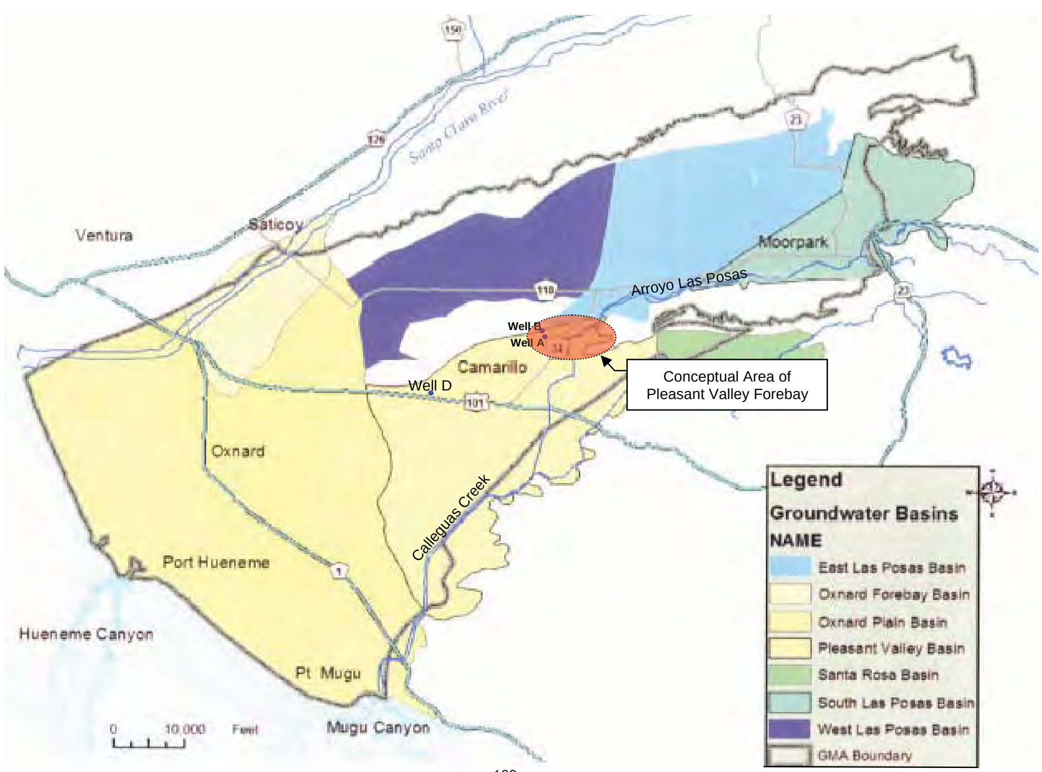
Attachment – Figure of Pleasant Valley Forebay

City of Camarillo Comments on June 2006 Draft GMP
August 25, 2006

cc:
Tom Smith – City of Camarillo
Curtis Hopkins – Hopkins Consultants
Randy Krueger – Black & Veatch
Tony Emmert – City of Oxnard
Jim Kentosh – UCWD
Jim Passanisi – City of Ventura
Carrie Mattingly – City of Port Hueneme
Steve Bachman, PhD – UCWD
Don Kendall, PhD – Calleguas MWD

Figure 1

Pleasant Valley Forebay Map



Lawrence (Larry) Fuller
7935 Dusty Lane
Somis, CA 93066
805-386-4086

September 26, 2006

Fox Canyon Groundwater Management Agency
800 S. Victoria Ave.
Ventura, CA 93009

Attn: David Panaro, Jeff Pratt & Steve Bachman

Subj: Comments and concerns on the FCGWMA Management Plan.

Hi David,

I told you that I would put in writing some of my thoughts and concerns expressed in the 1st workshop. My research has led me to look at the management plan in the light of the State of California water case law especially the case CITY OF BARSTOW et al., v. MOJAVE WATER AGENCY (S071728) 21 August 2000. This case clarifies the Supreme Court of California's position on water rights. A summery of the Courts decisions can be found in Downey Brand Attorneys LLP document titled California Water Law & Policy Reporter- October 2000.

It is my understanding that the FCGWMA used the "equitable" (physical) concept for allocating pumping to all of the Fox Canyon aquifer pumpers. This method of allocation is clearly a violation of the law, if I understand the California Supreme Court ruling cited above. The three levels of priority, as stated in the case law, are 1st Priority Overlying Owners, 2nd in priority are appropriators and 3rd are exporters (water transferred out of the immediate pumping area).

The clearest statement of this fact is found on page 29 starting with line 3. "We repeat the guiding principle: 'Under California law, "[p]roper **overlying use**,…is paramount, and the right of an **appropriator**, being limited to the amount of **surplus**, must yield to that of the overlying owner in the event of a shortage unless the appropriator has gained prescriptive rights through the taking of nonsurplus waters." [Citation.]' (*Hi-Desert County Water Dist. V. Blue Skies Country Club, Inc., supra*, 23 Cal.App.4th 1723-1731, Thus, while the rights of all overlying owners in a ground water basin are correlative, and subject to cutbacks when the basin is over drafted, **overlying rights are superior to appropriative rights.** Here, the trial court did not attempt to determine the priority of water rights, and merely allocated pumping rights based on prior production. This approach elevates the rights of appropriators and those producing without any claim of right to the same status as the rights of riparins and overlying owners. The trial court erred in doing so."

It is my request that the FCGWMA board of directors DO NOT make any further pumping reductions until these legal issues can be resolved. The case law sited states that *only* the Court has the right to restrict our pumping. A little caution now could prevent law suits caused by not following the law. (page 54,61) The original allocation system did not take into consideration efficient use of water and therefore it was/is flawed. **The allocation should also consider the number of water sources available to a given property.** Some properties have water available via pipelines from major water suppliers while many properties are dependent on their wells as the only source of water. Small users, Coops and small M &I/Agriculture systems are not addressed specifically in Management Plan. In addition to this the FCGWMA board has no small operation representative on the board to insure that their interests and concerns will be heard.

Another issue that I talked about in the workshop was the FCGWMA's Board approval of CMWD application for injection/storage facilities in North Las Posas Groundwater Basin.

According to my understanding this letter opens the door for CMWD to acquire Fox Canyon Aquifer **prescriptive** pumping rights. The Board has already allowed the injection wells to be drilled and injection of imported water is progressing. It is imperative that CMWD be restricted **IN WRITING** that they will not be allowed to extract water outside of their injection field. The Board can not by letter change the California water laws regarding prescriptive water rights that can and will be developed if pumping is allowed outside of the injection site boundaries. See page two paragraph 4, end of 1st sentence….**OR IN THE NEAR VICINITY**. What constitutes "near"? One mile, five miles? It is a known fact that CMWD wants to pump Fox Canyon water to blend with their imported water. Overlying owner priority rights will be affected if this issue is not addressed before any extraction is started out side their injection field.

Another problem area with CMWD that was discussed, concerned the One for One or gallon for gallon of water pumped to be extracted. When I addressed this issue your engineer made light of my comments concerning both the wetting factor of the dry sands and the drift factor of the water moving through the aquifer. I have friends that are very knowledgeable in the field of both hydrology and geology. They state that anyone who knows anything about the Fox Canyon aquifer knows about the drift out through Hueneme Canyon and the losses of fluid due to wetting of a dry formation. I can only assume that CMWD is injecting into an area that is dry—water does not compress. David this is right down your alley. I know with your training you can do the calculations for both the wetting and the transfer function even if your engineer can't. The FCGWMA should not be providing free water to CMWD.

The Court case sited discussed in detail the effect of allowing a right by prescription to be developed. Please look into all of the FCGWM ordinances in the light of the rulings by the Court.

Sincerely,

Larry Fuller

Encl: Copies for Mr. Jeff Pratt
Mr. Steve Bachman

Appendix C

City of Oxnard 2019 Consumer Confidence Report

Tim Flynn
Mayor

Carmen Ramírez, *Esq.*
Mayor Pro Tem, District 2

Bert E. Perello
Councilmember, District 1

Oscar Madrigal
Councilmember, District 3

Bryan A. MacDonald
Councilmember, District 4

Gabriela Basua
Councilmember, District 5

Vianey Lopez
Councilmember, District 6

City Council Office
300 West Third Street, Oxnard, CA 93030

Public Information
You are invited to attend any of the regularly scheduled City Council meetings:

When:
Tuesdays at 6:00 PM (twice a month)

Where:
City Council Chambers
305 West Third Street, Oxnard, CA 93030

For more information:
visit www.Oxnard.org/CCR or call (805) 385-8136

For additional information: Environmental Protection Agency Safe Drinking Water Hotline: (800) 426-4791

Drinking Water Consumer Confidence Report

2018 Annual Water Quality Report for City of Oxnard Water Customers

This report contains important information about your drinking water.

Este informe contiene información muy importante sobre su agua potable. Tradúzcalo o hable con alquien que lo entienda bien.

Drinking Water Consumer Confidence Report 2018

Please share this information with others at your location by posting this notice in a public place or common area. This Drinking Water Consumer Confidence Report is available in English and Spanish (Español) on the City's website at www.oxnard.org/CCR. For any questions about this report, please contact the Water Division Manager, Omar Castro, at (805) 385-8136.

Dear Valued Customer,

I am pleased to share the 2018 Drinking Water Consumer Confidence Report. Oxnard's water team is dedicated to delivering reliable, high-quality drinking water at the lowest possible cost that meets or exceeds all water quality standards, each and every day.

This report contains important water quality testing results, background on our water resources, and information about our continued investment in water infrastructure and supplies. We invite you to partner with us to support Oxnard's health and vitality today and into the future.

Sincerely,

Omar Castro
Water Division Manager

CITY OF OXNARD CALIFORNIA

DRINKING WATER SOURCES AND TREATMENT

Oxnard's water supplies include imported water from the Calleguas Municipal Water District (Calleguas), regional water purchased from the United Water Conservation District (United), and water from City groundwater wells.

IMPORTED WATER: CALLEGUAS MUNICIPAL WATER DISTRICT (45% OF SUPPLY)

Calleguas is a member agency of the Metropolitan Water District of Southern California (Metropolitan), the major water importer and wholesale agency for Southern California. Water supplied to Oxnard from Calleguas originates in Northern California via the State Water Project: a system of reservoirs, aqueducts and pump stations. This water is treated either by Metropolitan's Jensen Water Treatment Plant or by Calleguas' Lake Bard Water Filtration Plant. Both Metropolitan and Calleguas perform routine watershed surveys, source water quality sampling and analyses, and operational and treatment activities to ensure the water supplied maintains a high quality.

GROUNDWATER: UNITED WATER CONSERVATION DISTRICT (25% OF SUPPLY)

United manages, stores and may periodically release water from Lake Piru into the Santa Clara River. During high flows and after storms, United may also divert Santa Clara River water into spreading ponds near El Rio, capturing water that would have otherwise been lost to the ocean. This river water infiltrates and recharges the Oxnard Plain groundwater aquifer. Later the groundwater is extracted, treated, and delivered to several retail water agencies in the region including Oxnard. United performs regular watershed surveys as well as routine sampling and water quality analyses to ensure that water stored, treated, and delivered to its customers maintains a consistent quality.

GROUNDWATER: OXNARD (30% OF SUPPLY)

Oxnard Water operates ten groundwater wells that are tested and monitored on a regular basis to meet all drinking water standards. To produce an aesthetically pleasing drinking water quality, City well water is either blended with water from Calleguas or United well water or treated water from the City's Groundwater Desalter Treatment Facility. The Desalter, fed by City wells, improves water quality by using reverse osmosis treatment to remove dissolved minerals and is capable of processing up to 7.5 million gallons of water per day.

Oxnard Water also conducts routine source water assessments in order to detect potential contaminants in the groundwater before they become a problem. This includes possible contaminants from local gas stations, private septic systems, drainage from agriculture, and industrial facilities such as chemical and petroleum processing and storage facilities, dry cleaners, metal plating, finishing and fabricating facilities.

REASON FOR THIS REPORT

Oxnard Water is committed to informing City residents about the sources and quality of their drinking water. The City is proud to have successfully met strict water quality guidelines set by the California Division of Drinking Water (CDDW) and the US Environmental Protection Agency (USEPA). This report is a summary of water quality monitoring results from January through December 2018.

WATER QUALITY MONITORING

All of the monitoring conducted is necessary to ensure that your water is safe to drink and also aesthetically pleasing. Monitoring is a result of prescribed regulations from the USEPA as well as the CDDW. These regulations limit the amount of certain health-based and aesthetic contaminants in water provided by all public water systems. Many of the monitoring, treatment, and water quality requirements that are placed upon local drinking water supplies are actually more stringent than for bottled water.

Here is some additional information that may provide assistance in interpreting information in the 2018 Water Quality Tables:

- Some of the parameters measured will change very infrequently in their environment. For these parameters, the State allows the City to monitor them less than once a year. Therefore, some of the City's data - although representative - is more than one year old.
- Unregulated contaminant monitoring is conducted in order to assist USEPA and CDDW to determine where certain contaminants occur and whether the contaminants need to be regulated. There are many more contaminants that were monitored than what is reported in the included water quality table; however, they were never detected in your drinking water so they are not listed.
- The sources of drinking water (both tap and bottled water) include rivers, lakes, streams, ponds, reservoirs, springs and wells. As water travels over the surface of the land or through the ground, it dissolves naturally-occurring minerals and, in some cases, radioactive materials, and can pick up substances resulting from the presence of animals or from human activity.
- Contaminants that may be present in source water include:
  - o Microbial contaminants, such as viruses and bacteria, which may come from sewage treatment plants, septic systems, agricultural livestock operations, and wildlife.
  - o Inorganic contaminants, such as salts and metals, that can be naturally-occurring or result from urban stormwater runoff, industrial or domestic wastewater discharges, oil and gas production, mining, or farming.
  - o Pesticides and herbicides that may come from a variety of sources such as agriculture, urban stormwater runoff, and residential uses.
  - o Organic chemical contaminants, including synthetic and volatile organic chemicals, which are byproducts of industrial processes and petroleum production, and can also come from gas stations, urban stormwater runoff, agricultural application, and septic systems.
  - o Radioactive contaminants that can be naturally-occurring or be the result of oil and gas production and mining activities.
- In order to ensure that tap water is safe to drink, the USEPA and State Water Resources Control Board prescribe regulations that limit the amount of certain contaminants in water provided by public water systems. State Board regulations also establish limits for contaminants in bottled water that provide the same protection for public health.
- Drinking water, including bottled water, may reasonably be expected to contain small amounts of some contaminants. The presence of contaminants does not necessarily indicate that water poses a health risk. More information about contaminants and potential health effects can be obtained by calling the USEPA's Safe Drinking Water Hotline (1-800-426-4791).
- Your drinking water comes from a blend of sources. The water quality data presented in this report is based on the blended water supply that is delivered through the water distribution system.

IMPORTANT HEALTH INFORMATION

Some people may be more vulnerable to contaminants in drinking water than the general population. Immuno-compromised persons such as persons with cancer undergoing chemotherapy, persons who have undergone organ transplants, people with HIV/AIDS or other immune system disorders, some elderly, and infants can be particularly at risk from infections. These people should seek advice about drinking water from their health care providers. USEPA/Centers for Disease Control (CDC) guidelines on appropriate means to lessen the risk of infection by Cryptosporidium and other microbial contaminants are available from the Safe Drinking Water Hotline (1-800-426-4791).

Nitrate (as Nitrogen) in drinking water at levels above 10 mg/L is a health risk for infants of less than six months of age. Such nitrate levels in drinking water can interfere with the capacity of the infant's blood to carry oxygen, resulting in a serious illness; symptoms include shortness of breath and blueness of the skin. Nitrate (as Nitrogen) levels above 10 mg/L may also affect the ability of the blood to carry oxygen in other individuals, such as pregnant women and those with certain specific enzyme deficiencies. If you are caring for an infant, or you are pregnant, you should ask advice from your health care provider.

The City's water supply has been tested for lead. Lead sampling shows levels are below regulatory limits. In addition, the City conducted lead sampling at 33 schools under the "Lead Sampling in Schools" program in 2018-19. If present, elevated levels of lead can cause serious health problems, especially for pregnant women and young children. Lead in drinking water is primarily from materials and components associated with service lines, water meters and home plumbing. Oxnard Water is responsible for providing high quality drinking water, but cannot control the variety of materials used in plumbing components. When your water has been sitting for several hours, you can minimize the potential for lead exposure by flushing your tap for 30 seconds to 2 minutes before using water for drinking or cooking. If you are concerned about lead in your water, you may wish to have your water tested. Information on lead in drinking water, testing methods, and steps you can take to minimize exposure is available from the Safe Drinking Water Hotline or at http://www.epa.gov/safewater/lead.

Be Water Wise

Help conserve our precious water supplies and save money…

Switch to high-efficiency toilets, washing machines and irrigation devices. Fix leaks right away. Change your thirsty lawn to a beautiful, water-saving California Friendly® Landscape.

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City of Oxnard Summary of Water Quality Results / *Summary of Water Quality Results For 2018*

The water quality tables describe the parameters measured in the various water supply sources and the results of those measurements during 2018. Please note that the summary tables represent a blend of water quality which is delivered to customers throughout the City.

Parameter	MCL [MRDL]	PHG (MCLG) [MRDLG]	Range	Average	Year Tested	Major Sources in Drinking Water
PRIMARY DRINKING WATER STANDARDS - Mandatory Health-Related Standards						
INORGANIC CHEMICALS						
Arsenic (ppb)	10	0.004	0.85 - 1.3	1.08	2018	Erosion of natural deposits, orchard runoff
Fluoride (ppm)	2.0	1.0	0.38 - 0.58	0.5	2018	Water additive that promotes strong teeth
Nitrate (as N) (ppm)	10	10	2.1 - 4.0	2.87	2018	Runoff & leaching from fertilizer & sewage
Selenium (ppb)	50	30	2.2 - 6.1	4.12	2018	Erosion of natural deposits; discharge from refineries
RADIOLOGICALS (a) (b)						
Gross Alpha Particle Activity (pCi/L)	15	0	1.67 - 5.24	3.62	2018	Erosion of natural deposits
Gross Beta Particle Activity (pCi/L)	50	0	2.1 - 3.9	3.42	2018	Decay of natural and manmade deposits
Uranium (pCi/L)	20	0.43	2.2 - 4.4	3.17	2018	Erosion of natural deposits

City of Oxnard Summary of Water Quality Results / *Summary of Water Quality Results For 2018*

Parameter	Secondary MCL	Notification Level	Range	Average	Year Tested	Major Sources in Drinking Water
SECONDARY DRINKING WATER STANDARDS - Aesthetic Standards						
Aluminum (ppb)	200		6.8 - 23.0	15.4	2018	Erosion of natural deposits, residual from water treatment process
Chloride (ppm)	500		47 - 78	63.7	2018	Runoff and leaching from natural deposits; seawater influence
Iron (ppb)	300		ND - 4	3.5	2018	Leaching from natural deposits; industrial waste
Manganese (ppb)	50	500	ND - 5.6	3.8	2018	Leaching from natural deposits
Odor Threshold (Units)	3.0		1.0 - 1.0	1.0	2018	Naturally-occurring organic materials
Specific Conductance (µS/cm)	1,600		900 - 1,100	1,000	2018	Substances that form ions when in water, seawater influence
Sulfate (ppm)	500		170 - 280	220	2018	Runoff and leaching from natural deposits
Total Dissolved Solids (ppm)	1,000		470 - 700	570	2018	Runoff and leaching from natural deposits
Turbidity (NTU)	5.0		ND	ND	2018	Soil runoff
ADDITIONAL PARAMETERS (Unregulated)						
Alkalinity (ppm)	NS	NS	130 - 160	142.5	2018	Erosion of natural material
Calcium (ppm)	NS	NS	64.9 - 97.7	80.2	2018	Erosion of natural material
Hardness (Total Hardness) (ppm)	NS	NS	264 - 382	319.7	2018	Erosion of natural material
Magnesium (ppm)	NS	NS	24.8 - 33.6	29	2018	Erosion of natural material
pH (pH Units)	NS	NS	7.39 - 7.96	7.6	2018	- -
Potassium (ppm)	NS	NS	3.5 - 4.0	3.8	2018	Erosion of natural material
Sodium (ppm)	NS	NS	72.0 - 83.0	77.2	2018	Erosion of natural material; Seawater influence
ADDITIONAL PARAMETERS (Unregulated) noted in the source water prior to blending.						
Boron (ppm)	NS	1	0.35 - 0.62	0.44	2018	Naturally present in the environment
Chlorate (ppb)	NS	800	6.0 - 95.0	37.7	2018	By-product of water disinfection
Total Organic Carbon (ppm)	NS	50	0.96 - 2.0	1.59	2018	Various natural and manmade sources

City of Oxnard Summary of Water Quality Results / *Summary of Water Quality Results For 2018*

Parameter	State MCL [MRDL]	PHG (MCLG) [MRDLG]	Range	Average	Greatest RAA	Major Sources in Drinking Water
DISINFECTION RELATED MONITORING						
Disinfectant Residual Total chlorine, as residual (ppm)	[4.0]	[4.0]	0.03 - 2.8	1.52	1.65	Disinfectant added to control microbiological parameters
Disinfection By-Products Haloacetic acids (HAA5) (ppb)	60	N/A	ND - 13	6.16	7	Byproducts of drinking water disinfection using chlorine
Total trihalomethanes (TTHM) (ppb)	80	N/A	1.4 - 38	26.75	22.5	Byproducts of drinking water disinfection using chlorine
DISINFECTION-RELATED MONITORING noted in source water prior to blending.						
Bromate (ppb) (c)	10	0.1	2.2 - 3.7	3.13		Byproduct of drinking water disinfection
LEAD AND COPPER MONITORING 2018						
Copper (d) (ppb)	1,300 (AL)	300	90th percentile value		580	Erosion of natural materials and corrosion of household plumbing fixtures
			No. of sites sampled		52	
			Sites exceeding AL		0	
Lead (d) (ppb)	15 (AL)	0.2	90th percentile value		6.1	Erosion of natural materials and corrosion of household plumbing fixtures
			No. of sites sampled		52	
			Sites exceeding AL		3	

Abbreviations and Definitions

AL	Federal Regulatory Action Level
DDW	Department of Drinking Water
MCL	Maximum Contaminant Level
MCLG	Maximum Contaminant Level Goal
MRDL	Maximum Residual Disinfectant Level
MRDLG	Maximum Residual Disinfecant Level Goal
NA	Not Applicable
ND	Not Detected
NS	No Standard
NTU	Nephelometric turbidity units
pCi/L	picoCuries per liter
PHG	Public Health Goal
ppb	Parts per billion = Micrograms per liter (ug/l)
ppm	Parts per million =Milligrams per liter (mg/l)
RAA	Running Annual Average
SWRCB	State Water Resources Control Board
uS/cm	microSiemen per centimeter.

a - SWRCB DDW considers 50 pCi/L to be the level of concern for beta particles; the gross beta particle activity MCL is 4 millirem/year annual dose equivalent to the total body or any internal organ.

b - Radionuclides are sampled over a range from throughout a given year to every 6 years.

c - Compliance for treatment plants that use ozone is based on a running annual average of monthly samples.

d - Lead and Copper Monitoring was last conducted throughout the City's distribution system in 2018 and is scheduled to be sampled again in 2021.

Water is Life, Infrastructure Makes It Happen

Water reliability is important to the quality of life and economic vitality of our community. Capital projects that replace, renew and upgrade our water system pipelines, wells and treatment facilities keep our infrastructure healthy and working for the coming decades. Here's some highlights from recent projects:

GROUNDWATER WELL REHABILITATION

Oxnard's system includes 10 groundwater wells that pump about 30% of the water supply. Well equipment and components must be inspected, maintained and replaced to keep them operating efficiently. Two wells were rehabilitated in 2018 which helps to improve our overall well operations.

PIPE REPLACEMENT

Water system pipelines made of cast iron become brittle and are prone to breaks as they become older. Oxnard has a schedule to systematically replace these aging pipes. In 2018 the City replaced approximately 12,000 feet of cast iron water main with polyvinyl chloride (PVC) pipes, which can last up to 100 years.

DESALTER TREATMENT FACILITY MEMBRANE REPLACEMENT

The Desalter Facility cleans groundwater that otherwise could not be used as a water source. It uses reverse osmosis technology to remove dissolved minerals but over time, the membrane cartridges that filter the minerals exceed their useful life. To keep this treatment facility running smoothly, the Water Division purchased 996 new reverse osmosis membranes to replace two of the three membrane trains.

RECYCLED WATER EXPANDED USE

In 2016, Oxnard's Advanced Water Purification Facility (AWPF) began delivering recycled water after years of planning and investment. The largest water treatment facility of its kind in our area, the AWPF currently supplies highly-purified water to agriculture, landscaping and industry. In 2014, new regulations were adopted that allows the injection of recycled water into groundwater aquifers. Following a rigorous regulatory and testing program, the water can be pumped out (recovered) after 3-4 months, treated again, and distributed as potable water. This is known as "indirect potable reuse" or IPR.

Oxnard is making progress in demonstrating this option's viability for our community. To date, the Aquifer Storage and Recovery (ASR) well test system includes one ASR well, three monitoring wells, and pumping equipment. The Los Angeles Regional Water Quality Control Board is expected to approve the project in 2019, which is required to begin the yearlong testing phase. Currently in design, the remaining well equipment is projected to be constructed within 18 months to two years. While there are additional tasks and phases which may delay the schedule, recycled water is targeted to be added as a water source by 2022. This important project will help reduce reliance on costly imported water, protect our groundwater resources, and create a beneficial reuse of a scarce resource that would otherwise be lost to the ocean.

CITY OF OXNARD CALIFORNIA

City of Oxnard
Water Division
251 S. Hayes Avenue
Oxnard, CA 93030

Please share this information with others at your location by posting this notice in a public place or common area. This Drinking Water Consumer Confidence Report is available in English and Spanish (Español) on the City's website at www.oxnard.org/CCR. For any questions about this report, please contact the Water Division Manager, Omar Castro, at (805) 385-8136.

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