



August 16, 2021

Mound Basin Groundwater Sustainability Agency  
P.O. Box 3544  
Ventura, CA 93006-3544

**Subject: Comments on the Mound Basin GSA Draft Groundwater Sustainability Plan  
(Published July 2021)**

Mound Basin GSA,

After review of the Mound Basin Groundwater Sustainability Agency's Draft Ground Water Sustainability Plan, Casitas Municipal Water District has the following comments:

1. Page ES-iii, second paragraph, the City of Ventura's Ventura River surface diversions should also be mentioned here (Note: this relationship is correctly mentioned in paragraph six on page 32 and the last paragraph on page 73).
2. Page ES-vi, fourth paragraph the City of Ventura's Ventura River surface diversions should also be mentioned here.
3. Page 7, fourth paragraph, the City of Ventura's Ventura River surface diversions should also be mentioned here.
4. Page 10, second section (Casitas MWD Urban Water Management and Agricultural Water Management Plan), Casitas recently adopted its 2020 Urban Water Management Plan (UWMP), elements of which should be included in this section (link: <https://www.casitaswater.org/your-water/urban-water-management-plans>).
5. Page 24, first paragraph states: "As a wholesale water provider to Ventura Water, Casitas MWD's interests were represented via the City's participation on the MGBSA Board of Directors". No proof of this statement has been located by Casitas Staff and thus it should be removed. Further, as a separate Special District of the State of California, Casitas MWD has a responsibility to its stakeholders that is separate to that of the City of Ventura and it should not be seen as Casitas MWD surrendering this authority without an action of the Casitas Board of Directors. Although Casitas does not have facilities within the Mound Basin currently nor sit on the MBGSA Board of Directors, it should still be viewed as an active stakeholder in the basin.
6. Page 83, fourth paragraph notes 'exceptional drought' from 2012 to 2016. This is an accurate statewide metric but not for the local drought conditions that have caused a relatively steady decline in Lake Casitas' storage levels from 2011 through the present day. Mandated conservation goals along with the associated penalties should also be mentioned as reasons for lowering of demands.

Regards,

  
Michael Flood

General Manager - Casitas Municipal Water District