




## WATERSHED PROTECTION

### MEMORANDUM

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**DATE:** August 23, 2021

**TO:** Jackie Lozano, Clerk of the Board, Mound Basin Groundwater Sustainability Agency

**FROM:** James Maxwell, PG, CEG, Groundwater Specialist, Water Resources Division 

**SUBJECT:** Preliminary Draft Mound Basin Groundwater Sustainability Plan

The Ventura County Public Works Agency, Water Resources Division, Groundwater Resources Section (VCGRS) reviewed the documents submitted by the Mound Basin Groundwater Sustainability Agency (MBGSA).

#### DESCRIPTION

The Mound Basin Groundwater Sustainability Agency's *Preliminary Draft Mound Basin Groundwater Sustainability Plan* (Draft) dated June 2021.

#### DRAFT GSP QUESTIONS/COMMENTS

Section 2.2.1 discusses water usages throughout the Mound Subbasin but does not reference individual, domestic/private well usage. The Draft states that "There are no known de minimus extractors in the Mound Basin." County records show that there is one known, active domestic-designated water well and several potentially abandoned domestic wells. Also reference Section 5.2.

Section 2.2.2.1 references the Ventura County Public Works Agency, Watershed Protection (VCPWA-WP) Groundwater Resources monitoring program. The number of wells monitored by groundwater resources varies but is usually between two and four groundwater wells within the Subbasin.

Section 2.2.2.2 references the previous versions of the Urban Water Management Plans (UWMPs) and Water Shortage Contingency Plans (WSCPs) for the City of Ventura (2016) and Casitas Municipal Water District (2016). It should be reflected in the Draft that 2020 UWMP updates have been released and/or adopted. Figures, data, and other relevant information should be updated in the Draft from the most recent UWMPs.

There is no discussion of United Water Conservation District's (UWCD's) 2015 and 2020 UWMPs and 2020 WSCP.

Section 2.2.3.2 discusses water well permitting through the VCPWA-WP. It should be noted that the County oversees compliance with the County Water Well Ordinance No. 4468 which is inclusive of the California Water Well Standards Bulletins 74-9, 74-81 and 74-90 with future revisions currently under discussion.

There is no discussion of potential impacts to groundwater from septic systems or wastewater treatment systems and abandoned wells that potentially serve as conduits for contaminant migration to the underlying aquifers (Section 4.7).

There is minimal or no discussion of the Mound Subbasin and the Oxnard Subbasin boundary and any long-term operational interactions between the Fox Canyon Groundwater Management Agency (FCGMA) and MBGSA.

Faulting is discussed in Section 3.1.4.1.2 and identifies the absence of monitoring wells on opposing sides of known faults. Known and monitored groundwater wells could provide information regarding potential impedance to groundwater movement across these faults.

The Figures shown in the Executive Summary on pages ES-iv and -v should be placed in and would better illustrate the subsections of Section 3.1.4.1.

In Section 3.1.4.2, it would be beneficial to include estimated and separate quantities of M&I and agricultural return flows within the Subbasin.

In Section 3.1.4.3, the Draft mentions using groundwater quality data from VCPWA-WP. The most recently used data was from 2017. The County has more recent water quality data through 2020.

Section 3.1.4.4 could include a brief section discussing domestic groundwater wells and the limited use of these types of wells in the Subbasin. Ventura County records indicate that there is one active domestic well.

Section 3.2.1.1 includes groundwater level information up to 2019. There is current water level elevation data from Ventura County through 2020.

Section 3.2.4 discusses groundwater quality impacts to several agricultural water wells screened in the Mugu and Hueneme aquifers. The Draft suggests that elevated concentrations of nitrates in these wells would implicate the migration of contaminants to these aquifers from compromised well seals or casings. The section should include a discussion of the use of wastewater treatment systems in the vicinity of these wells.

Sections 4.4.2.5 and 4.8 discusses land subsidence in the western and eastern halves of the Subbasin. There is sufficient InSAR data for monitoring subsidence in the eastern half but not the western. Daniel B. Stephens & Associates, Inc. (a Geo-Logic Company) developed the *Fillmore and Piru Basins Land Subsidence Evaluation Technical*

*Memorandum* for the Fillmore and Piru Basins Groundwater Sustainability Agency dated February 4, 2021. The memo addresses land subsidence within the Fillmore and Piru Subbasins. Consider development of a similar technical evaluation for the Mound Subbasin to assess conditions in the western half of the Subbasin and any correlations to existing data for the eastern half.

Sections 5.2.3 and 5.3.3 discuss the design of a monitoring network and collection of data and mentions that monitoring will be affected by implementation of the Oxnard Groundwater Sustainability Plan. Consider noting that future monitoring information from the FCGMA could be used to supplement the MBGSA reporting data.

Section 6.5 states the MBGSA will coordinate with the County to identify and address improperly constructed and abandoned wells. It should be noted that this is also to maintain compliance with the Ventura County Well Ordinance No. 4468.