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Reply to: Ventura Office

September 1, 2021

Via Email

Bryan Bondy, PG, CHG
Executive Director
Mound Basin GSA
P.O. Box 3544
Ventura, CA 93006-3544
Email: bryan@moundbasingsa.org

Re: *Draft Mound Basin Groundwater Sustainability Plan*

Dear Mr. Bondy:

On behalf of the Mound Basin Agricultural Water Group (MBAWG), we appreciate your consideration of the comments below regarding the draft Groundwater Sustainability Plan (GSP).¹ Our comments are brief and in the nature of requests for clarification.

First, the draft GSP provides, in section 3.3.4.1, an overdraft assessment required by section 354.18(b)(5) of the GSP Emergency Regulations. The draft GSP utilizes the characterization of overdraft from the Department of Water Resources' Bulletin 118, which provides in part: "Overdraft can be characterized by groundwater levels that decline over a period of years and never fully recover, even in wet years."

¹ We apologize for the belated nature of our comments.

Section 3.3.4.1 of the draft GSP further notes, “Review of the historical, current and projected groundwater budgets indicate small amounts of declining groundwater storage over time (469 and 147 for the historical and current periods, respectively), as shown in Table 3.3-03.” In light of this discussion, we would appreciate clarification regarding the following:

1. Are the values provided in Table 3.3-03 within the error range for the various referenced water budgets?
2. Have the above estimates regarding groundwater storage been accompanied by any reports or accounts of any undesirable results in the Basin?

Second and lastly, the draft GSP discusses, in several areas, the lack of a relationship between the Mound Basin’s shallow aquifer, which is not utilized for groundwater production, and other aquifers that are being utilized by the Basin’s landowners and the City of Ventura. For example, page 68 of the draft GSP notes, with regard to surface water connectivity issues, that the shallow aquifer does not have “any known groundwater extractions within Mound Basin.”

MBAWG is similarly unaware of any groundwater production from the shallow aquifer. MBAWG also agrees that the shallow aquifer does not seem to interact with the aquifers that are beneficially used, in part because we do not see any associated diminished water quality in the deeper aquifers. With that said, it might be helpful for the GSP to provide further confirmation regarding the connectivity, or lack thereof, between the Basin’s aquifers.

Thank you again for your consideration.

Sincerely,



Neal Maguire