

FCGMA Draft Groundwater Sustainability Plan Comments

September 2019

Oxnard Subbasin

Commenter		Chapter	Section	Subsection	Comment	
Dan	Detmer	UWCD	Executive Summary	ES.1- Introduction	N/A	see attachment
Mary	Ngo	CDFW	2 - Basin Setting	2.3- Groundwater Conditions	2.3.1 Groundwater Elevation Data	Please see attached comment letter
Thien	Ng	City of Oxnard / Assistant Public Works Director	1 - Administrative Information	1.6-Land Use Elements or Topic Categories of Applicable General Plans	1.6.3 Additional Plan Summaries	<p>Concern in the following reflected quote on Page 1-40: "In recognition and acknowledgment of the limits on FCGMA to regulate the federal government, any such allocation shall be directly assigned to the federal agency and shall not be subject to the requirements of any allocation ordinance, including but not limited to allocation carryovers, borrowing, transfers, reductions and/or variances and fees."</p> <p>The description of Federal Reserved Water Rights (FRWR) in the GSP overstates the extent of federal law preemption. While it is true that FRWR are determined as provided under federal law, the text in the GSP does not acknowledge the importance of Congress' waiver of sovereign immunity in passing the McCarran Amendment. (43 U.S.C. § 666.) "[T]he McCarran Amendment was motivated in large part by the recognition of the interconnection of water rights among claimants to a common water source and the desire to avoid piecemeal adjudication of such rights." United States v. State of Oregon (9th Cir. 1994) 44 F.3d 758, 769.) The regulation of FRWR under California statutory law is appropriate under the McCarran Amendment and statements to the contrary should be removed from the GSP.</p>
Thien	Ng	City of Oxnard / Assistant Public Works Director	1 - Administrative Information	1.4-Existing Monitoring and Management Plans	1.4.3 Operational Flexibility Limitations	<p>Requested Revision of the following quote on Page 1-21 to 1-22; "For the Oxnard Subbasin, water purveyors collectively draw from a combination of sources—including local surface water, groundwater, imports from the State Water Project (SWP), and increasingly, recycled water— which differ in terms of the volume available, area served, timing of peak availability, and reliability. Climate and regulatory constraints (e.g., water quality standards, water rights, and minimum environmental flows) have historically had a greater impact on the availability of surface water supplies, whereas groundwater sources with adequate water quality were historically limited only by the capacity of production wells accessing the aquifer, leading to pumping in excess of many basins' sustainable yield. With the passage of SGMA and the sustainable management criteria established in this GSP (Chapter 3), once adopted, groundwater extraction will be limited by minimum thresholds established for each sustainability indicator. FCGMA has exercised its authority to limit groundwater production since 1983, and thus has managed the basin to void critical overdraft. Sustainable management criteria adopted in this GSP may limit operational flexibility by further reducing allowable groundwater production."</p> <p>revised to</p> <p>"For the Oxnard Subbasin, water purveyors collectively draw from a combination of sources—including local surface water, groundwater, imports from the State Water Project (SWP), and increasingly, recycled water—which differ in terms of the volume available, area served, timing of peak availability, and reliability. Climate and regulatory constraints (e.g., water quality standards, water rights, and minimum environmental flows) have historically had a greater impact on the availability of surface water supplies. Groundwater sources with adequate water quality were historically limited only by the capacity of production wells accessing the aquifer, until 1991 when FCGMA initiated a groundwater allocation reduction system. With the passage of SGMA and the sustainable management criteria established in this GSP (Chapter 3), once adopted, groundwater extraction will be further limited by minimum thresholds established for each sustainability indicator. FCGMA has exercised its authority to limit groundwater production since 1983, and thus has managed the basin in an effort to avoid critical overdraft. Because in 2014 the State Department of Water Resources listed the Oxnard Subbasin as being in a state of Critical Overdraft, the sustainable management criteria adopted in this GSP may limit operational flexibility."</p> <p>NOTE: Operational flexibility will not be so limited once the FCGMA considers projects to significantly replenish, and protect against seawater intrusion in, the basin. See attached Oxnard letter section I(D).</p>

Commenter		Chapter	Section	Subsection	Comment	
Thien	Ng	City of Oxnard / Assistant Public Works Director	1 - Administrative Information	1.1-Purpose of the Groundwater Sustainability Plan	N/A	<p>Concern regarding the following quote provided on page 1-2; "The purpose of this GSP is to define the conditions under which the groundwater resources of the entire Oxnard Subbasin . . . will be managed sustainably in the future."</p> <p>The City understands and assumes that the GSP is not self-executing and that it does not alter existing rights, including water rights, nor does it modify or supersede prior actions or approvals by FCGMA. For example, the City understands that existing allocation ordinances and conjunctive use programs are not modified by approval of the GSP and can only be changed by future FCGMA action on those specific programs. Accordingly, Oxnard has not commented on the effect of the GSP on any such existing rights or prior FCGMA actions or approvals. If we are mistaken about the non-self-executing nature of the GSP, we ask that FCGMA specify what rights, programs, actions or approvals are affected. We would also note that in such event, insufficient notice has been provided to allow meaningful public comment.</p>
Thien	Ng	City of Oxnard / Assistant Public Works Director	1 - Administrative Information	1.2-Agency Information	1.2.6 Groundwater Sustainability Plan Implementation and Cost Estimate	<p>Concern regarding the following quote provided on page 1-8; "During the initial 5-year period after the GSP is adopted, FCGMA will explore opportunities to optimize basin management"</p> <p>Please see attached City of Oxnard letter for in-detail comment and concern.</p>
Thien	Ng	City of Oxnard / Assistant Public Works Director	1 - Administrative Information	1.2-Agency Information	1.2.6 Groundwater Sustainability Plan Implementation and Cost Estimate	<p>Concern regarding the following quote provided on page 1-10; "Under SGMA, its enabling legislation, FCGMA gained additional authority to impose regulatory fees and replenishment fees"</p> <p>Please see attached City of Oxnard letter for in-detail comments and concern.</p>
Thien	Ng	City of Oxnard / Assistant Public Works Director	1 - Administrative Information	1.6-Land Use Elements or Topic Categories of Applicable General Plans	1.6.1 General Plans	<p>Please see attached City of Oxnard letter for in-detail comments and concern regarding Section 1.6 Land Use Elements or Topic Categories of Applicable General Plans.</p>
Thien	Ng	City of Oxnard / Assistant Public Works Director	1 - Administrative Information	1.6-Land Use Elements or Topic Categories of Applicable General Plans	1.6.2 Urban Water Management Plans	<p>Please see attached City of Oxnard letter for in-detail comments and concern regarding Section 1.6.2 Urban Water Management Plans.</p>
Thien	Ng	City of Oxnard / Assistant Public Works Director	1 - Administrative Information	1.6-Land Use Elements or Topic Categories of Applicable General Plans	1.6.3 Additional Plan Summaries	<p>Please see attached City of Oxnard letter for in-detail comments and concern regarding Section 1.6.3 Additional Plan Summaries – City of Oxnard General Plan.</p>

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Thien	Ng	City of Oxnard / Assistant Public Works Director	2 - Basin Setting	2.4-Water Budget	2.4.5 Projected Future Water Budget and Sustainable Yield Concern regarding the following quote provided on page 2-65 to 2-66; "...expansion of the GREAT program to increase groundwater recharge by 4,500 AFY in the Saticoy Spreading Grounds... Because the projects that were incorporated into the Future Baseline With Projects Scenario included reduction of approximately 500 AFY from temporary fallowing in Oxnard, and deliveries of recycled water from the GREAT program, the groundwater extractions in the LAS decreased by approximately 4,000 AFY, relative to the Future Baseline Scenario." The City of Oxnard has no intention of utilizing recycled water produced by the GREAT Program for the purpose noted. References to the use of GREAT Program water for Saticoy Spreading Grounds and related basin recharge should be removed from model simulation and narrative. Please see attached City of Oxnard letter for additional in-detail comments and concern.
Thien	Ng	City of Oxnard / Assistant Public Works Director	5 - Project Management Actions	5.2-Project No. 1 – GREAT Program Advanced Water Purification Facility	N/A Concern regarding the following quote provided on page 5-2; "The AWPf provides the City of Oxnard with a source of reclaimed water that can be used for landscape irrigation, agricultural, industrial process water, and groundwater recharge." Please see attached City of Oxnard letter for in-detail comments and concern.
Thien	Ng	City of Oxnard / Assistant Public Works Director	5 - Project Management Actions	5.2-Project No. 1 – GREAT Program Advanced Water Purification Facility	N/A Please see attached City of Oxnard letter for in-detail comments and concern regarding Section 5.2.6 Economic Factors and Funding Sources for Project No.1
Thien	Ng	City of Oxnard / Assistant Public Works Director	5 - Project Management Actions	5.3-Project No. 2 – GREAT Program Advanced Water Purification Facility Expansion Project	N/A Please see attached City of Oxnard letter for in-detail comments and concern regarding Section 5.3 Project No. GREAT Program Advanced Water Purification Facility Expansion Project.
Thien	Ng	City of Oxnard / Assistant Public Works Director	5 - Project Management Actions	5.3-Project No. 2 – GREAT Program Advanced Water Purification Facility Expansion Project	N/A Concern regarding the following quote provided on page 5-5; "GREAT Program AWPf Expansion Project water was included in future groundwater modeling scenarios to examine the impact that the project will have on the sustainability criteria. This project was incorporated in the modeling along with the GREAT Program AWPf Project (see Section 5.2, Project No. 1 – GREAT Program Advanced Water Purification Facility) and the temporary fallowing of agricultural land (see Section 5.6). Therefore, the relationship between the impact of this project alone and the sustainability indicators has not been quantified. Rather, the potential effect of this project in the context of all of three of these projects is presented in this discussion." Please see attached City of Oxnard letter for in-detail comments and concern.

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Thien	Ng	City of Oxnard / Assistant Public Works Director	5 - Project Management Actions	5.3-Project No. 2 – GREAT Program Advanced Water Purification Facility Expansion Project	N/A	<p>Concern regarding the following quote reflected on page 5-7; "Under one potential expansion scenario, the facility upgrades are anticipated to cost approximately \$16,600,000 (FCGMA 2018). Under this scenario, the water produced by the facility would cost approximately \$1,900 per AF. Operations and maintenance costs for the expanded AWPf would be approximately \$440 per AF."</p> <p>Please see attached City of Oxnard letter for in-detail comments and concern.</p>
Thien	Ng	City of Oxnard / Assistant Public Works Director	5 - Project Management Actions	5.4-Project No. 3 – RiverPark–Saticoy GRRP Recycled Water Project	N/A	<p>Concern regarding the following quote reflected on page 5-8; "The RiverPark–Saticoy GRRP Recycled Water Project is the same as the GREAT Program AWPf Expansion Project, as incorporated into the numerical groundwater model simulations, because the RiverPark–Saticoy GRRP Recycled Water Project simply provides the infrastructure to convey the water. It does not provide additional water to the Subbasin beyond what was modeled for the GREAT Program AWPf project.."</p> <p>Please see attached City of Oxnard letter for in-detail comments and concern.</p>
Thien	Ng	City of Oxnard / Assistant Public Works Director	5 - Project Management Actions	5.4-Project No. 3 – RiverPark–Saticoy GRRP Recycled Water Project	N/A	<p>Concern regarding the following quote reflected on page 5-9 "UWCD estimates that the RiverPark–Saticoy GRRP Recycled Water Project could be implemented in 18 to 24 months. The project is already in the preliminary design phase and a draft initial study/mitigated negative declaration has been prepared."</p> <p>Please see attached City of Oxnard letter for in-detail comments and concern.</p>
Thien	Ng	City of Oxnard / Assistant Public Works Director	5 - Project Management Actions	5.4-Project No. 3 – RiverPark–Saticoy GRRP Recycled Water Project	N/A	<p>Concern regarding the following quote reflected on page 5-10 "UWCD proposes funding assistance from FCGMA for the capital cost of the project, which is estimated to be \$6.4 million, with an annual operations and maintenance cost of approximately \$5 million to \$7.5 million. The resulting water cost would be approximately \$1,000 to \$1,500 per AF."</p> <p>Please see attached City of Oxnard letter for in-detail comments and concern.</p>

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Dan Detmer	UWCD	5 - Project Management Actions	5.1- Introduction to Projects and Management Actions	N/A	<p>Section 5.1 Although the sustainable yield for the Oxnard Subbasin as estimated in the Draft GSP is 30,000 acre-feet per year (AFY) less than recent groundwater extractions, the average rate of seawater intrusion—the primary driver for sustainable yield—reported in the Draft GSP is only 9,700 AFY. This difference between what some might perceive to be “overdraft” (30,000 AFY) versus the rate of seawater intrusion (9,400 AFY) that actually is a problem highlights the fact that much of the Oxnard Subbasin’s groundwater sustainability challenge is a result of pumping in less-than-optimal locations, rather than excessive pumping. This challenge can potentially be partly mitigated by expanding the existing conjunctive-use projects by United, Pleasant Valley County Water District, Camrosa Water District, and Calleguas Municipal Water District that store groundwater and deliver surface-water when available. “New” sources of water supply, such as the recycled-water projects being developed by the Cities of Oxnard and Ventura, likely will also be needed to make up some of the difference, but costs and environmental impacts of such new sources can be minimized, while reliability and quality of these water sources can be maximized, if they are developed and implemented in coordination with conjunctive use projects. In addition, this issue highlights the importance of ensuring that the FCGMA’s proposed allocation ordinance does not jeopardize the future viability of conjunctive-use projects. We recommend adding discussion to Section 5 describing the historical and potential future importance of conjunctive-use projects in optimizing sustainable yield of the Oxnard Subbasin.</p> <p>This section describes only the five new water-supply projects for the Oxnard subbasin and the one new project for the Pleasant Valley basin that were approved for consideration by the FCGMA; the existence of additional water-supply and optimization (conjunctive use) projects proposed by United and others last year when requested by the FCGMA should also be mentioned. Some of these other projects are not only viable, but are well into their feasibility planning and design stages at present (e.g., ASAPP and brackish-water treatment), and could make up much, if not all, of the shortfall indicated by the Draft GSP. We feel it’s important that the Draft GSP at least mention these new water-supply and optimization projects, even if they couldn’t be modeled with the available information, as they could add to our region’s water portfolio prior to 2040. Stakeholders and the public should have at least basic information about these projects so they can make appropriate decisions about when to commence any future rampdown in groundwater allocations (if rampdowns are truly needed). An excessive or premature rampdown could affect business and municipal planning decisions and have significant financial, social, and environmental impacts on the Oxnard coastal plain.</p> <p>Sec 5.7.1 p 5-15 Text stating that the actual pumping reductions that may take place over the next five years will be determined by the Board deserves more emphasis both here and in the Executive Summary. Without additional emphasis on this point readers my think that the linear ramp down examples provided in the GSP is the planned/intended action to achieve sustainability.</p>
Dan Detmer	UWCD	4 - Monitoring Networks	4.1- Monitoring Network Objectives	N/A	<p>Sec 4.3.3 p 4-8 (Spatial coverage by aquifer) No additional coastal monitoring wells are proposed, does this suggest the spacing of existing monitoring wells is considered adequate to assess changes in the location of the saline front?</p> <p>Sec 4.3.6 p 4-10 Please be more specific when describing locations of interconnected surface water. Existing language “SCR downstream of FD” should be changed to exclude the Forebay area where recorded depths to water near the SCR were consistently more than 100 feet in 2015.</p> <p>Sec 4.4.4 p 4-11 Some monitoring wells with stable water quality are sampled annually or twice annually (not quarterly).</p> <p>Sec 4.5 p 4-12 UWCD protocols for recognizing recent pumping include other indicators besides just a warm pump housing. Wet conditions at well and nearby fields also an indicator.</p> <p>Sec 4.6.3 p 4-14 UWCD currently gets a general mineral analysis at least annually for most monitoring well in the OP basin.</p> <p>Table 4-3 Screened aquifer and aquifer system for each well monitored was determined how? UWCD mapping of aquifer units?</p>

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Dan Detmer		UWCD	3 - Sustainable Management Criteria	3.1- Introduction to Sustainable Management Criteria	N/A	<p>Sec 3.3.2 p 3-5 Do we know that 380,000 AF of onshore GW flux was all seawater? Likely fresh water moving onshore in some areas, seawater in others.</p> <p>Sec 3.3.4.1 p 3-8 How will location of the inland extent of SWI be assessed in the future? Not a trivial task even though this is the sustainability criteria agreed to by FCGMA board.</p> <p>Sec 3.3.4.2 p 3-9 Again, what about recent and current ag practices? Recent nitrate conditions at El Rio have been among the worst ever recorded. Why would you say this likely related to “historical ag fertilizer application practices” and not include recent practices too?</p> <p>Section 3.3.7 Defining undesirable results using the three different metrics for each aquifer system as described in this section provides a level of flexibility that should enhance the ability to manage the Oxnard Subbasin to the benefit of all stakeholders, while protecting groundwater from significant and unreasonable impacts. We support this approach.</p> <p>Sec 3.4 p 3-13 Again, how will movement of saline water impact front be determined? Modeling or sampling of wells and geophysics?</p> <p>Sec 3.4.1 p 3-15 The contemplated redistribution of groundwater production and deepening of existing wells would require major a investment of capitol and is not a project contemplated in the GSP. It is not common practice to “deepen existing wells.”</p> <p>Sec 3.4.3 p 3-16 Why suggest chloride is a poor indicator of seawater intrusion? Better to say monitoring network is not sufficient to use direct monitoring as a reliable indicator,</p> <p>Sec 3.4.6 p 3-20 Incorrect to state that the semi-perched aquifer does not extend into PV or the LPV.</p> <p>Sec 3.5 p 3-21 characterization of sustainability as equal time for WLEs above and below MOs is a little too simple, as WLEs go farther below the MOs in times of drought than the go above MOs in wet periods. Onshore and offshore flux volumes need to balance, not the time. This was in the 2007 management plan also but it is a poor metric for sustainability.</p> <p>Section 3.5.1 The interim milestones described in this section indicate that the FCGMA will define success of GSP implementation by achieving a linear, 25% increase in groundwater elevations in the Oxnard Subbasin from 2020 to 2025, and over each subsequent 5-year period. However, Section 4 of the Draft GSP recommends collection of additional data during the next 5 years (2020 to 2025) to improve monitoring of groundwater elevations in specific aquifers and areas. In addition, Section 5 of the Draft GSP recommends “that FCGMA will evaluate, model, and conduct feasibility studies of other projects for achieving sustainable groundwater management for the 5-year update to this Draft GSP to optimize basin management and minimize extraction restrictions” (presumably referring to a 2025 update of the GSP). We agree that both collection of additional groundwater data and further evaluation of potential projects are the most critical sustainability planning activities that the FCGMA and other stakeholders should be focused on for the next 5 years. Considering that the Draft GSP indicates the FCGMA will spend the next 5 years improving the monitoring network and evaluating feasibility of new and existing projects, it seems counterproductive to set target groundwater elevations for 2025 that are almost certainly not going to be achieved (rising 25% toward the 2040 sustainable target levels), without a clear, explicit description of what actions will be taken during those 5 years to achieve that target. At present, the Draft GSP briefly and vaguely describes potential new water-supply projects that could be built by entities other than the FCGMA, and one management action (“Reduction in Groundwater Production”) that could potentially be implemented by FCGMA. However, the Draft GSP notes in Section 5 that “Because of the existing uncertainty associated with future conditions in the Subbasin, a plan for exact reductions and groundwater elevation triggers for those reductions has not been developed as part of this Draft GSP. Instead, FCGMA will work to develop this plan over next (sic) 20 years, as the level of uncertainty is reduced.” We recommend that the FCGMA work with stakeholders to select a more realistic interim milestone for 2025, with the expectation that subsequent interim milestones may require a “steeper path” to achieve the sustainability goals by 2040.</p> <p>A second management action, the Water Market Pilot Program, is also described in Section 5 (incorrectly enumerated as “Management Action No. 3”), but the very brief (3-paragraph) description of this action concludes with the statement, “Analysis of the Water Market Pilot Program will be conducted and its suitability for incorporation as a management action for the Subbasin will be determined after the pilot program is completed in July 2019.” The description of how or when this management action might be used to achieve interim milestones, measurable objectives, or minimum thresholds seems inadequate to be considered part of a “plan” for reaching groundwater sustainability. We recommend expanding the water market discussion to match the level of detail provided for “Management Action No. 1.” At present, far less detail is provided for Management Action “No. 3” than was provided for many of the stakeholder projects rejected by the FCGMA for having insufficient information to model impacts.</p> <p>Figure 3-12 Take care to note that a linear path to sustainability is provided as an example but is not a path proposed by the GSP.</p>

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Dan	Detmer	UWCD	2 - Basin Setting	2.1- Introduction to Basin Setting	N/A	<p>Sec 2.2.1 p. 2-5 Would be better to reference geological cross sections from United’s modeling report than Mukae and Turner 1975, as the results represented in this report are based on United’s aquifer and model results and not Turner or others. Would be good to note United’s mapping of aquifers largely comparable to Mukae and Turner.</p> <p>Sec 2.2.3 p, 2-7 Suggests tile drains exist throughout urban areas as wells as Ag areas. Not sure this is the case, but certain features such as flood control channels likely functions as drains in some areas.</p> <p>Sec 2.2.3 2-10 Why no mention of UWCD mapping of aquifers and model results? Why cite Turner and state most FCA recharge occurs in the Forebay when model used in GSP does not support that conclusion?</p> <p>Sec 2.2.3 p. 2-12 Why state GCA aquifer props are unknown when calibrate GW flow model provides estimates of GCA aquifer properties?</p> <p>Sec 2.2.4 p. 2-12 Be careful not to overstate the significance of some of the data gaps identified in this section.</p> <p>Sec 2.3.1.1 p. 2-15 Vertical gradients discussion for all aquifers should include more context. Vertical gradients promotes recharge to the deeper aquifers, and downward flux from the UAS to the LAS is a major mechanism for recharge to the LAS. Under the current depleted basin conditions there is more distributed recharge to the LAS in the confined portions of the Oxnard Plain than there is direct recharge to the LAS in the Forebay.</p> <p>Sec 2.3.1.4 p. 2-22 In the Mugu area the vertical flow of water from the Mugu aquifer to the FCA is a major mechanism for seawater intrusion into the LAS. See sections N and M in the Appendices to United’s GW flow model documentation, showing areas where the Hueneme aquifer is eroded away and Mugu lies unconformably on the FCA.</p> <p>Sec 2.3.3.1 p 2-28 Vertical gradient and SWI discussion should not be limited to movement of perched water to deeper zones. Mugu to FCA is also notable.</p> <p>Sec 2.3.3.3 p. 2-30 Chloride concentration over 19,000 mg/l should be characterized as brine and not seawater.</p> <p>Section 2.3.3.3 The Draft GSP correctly notes that seawater intrusion has largely been halted in most areas within the Upper Aquifer System (UAS) of the Oxnard Subbasin (except during extreme droughts), despite a slow continuous advance of the seawater intrusion front in the Lower Aquifer System (LAS). As also noted in the Draft GSP, the most challenging long-term sustainability issue that needs to be mitigated in the Oxnard subbasin is seawater intrusion in the LAS, which, due to different aquifer properties, occurs at a much slower pace than in the UAS. The groundwater flow paths depicted on Figures 2-63 through 2-68 of the GSP show few additional water-supply wells being impacted by seawater intrusion during the next 5 to 10 years, regardless of whether groundwater production continues “as-is” or is ramped-down starting in 2020. Furthermore, the difference in the estimated seawater intrusion fronts 5 years from now for “as is” versus “reduced pumping” scenarios are almost indistinguishable. Therefore, although mitigating seawater intrusion is the long-term driver for achieving groundwater sustainability in the Oxnard subbasin, it does not appear that implementing pumping reductions immediately will provide a significant benefit to the aquifers while data gaps are filled and additional water-supply projects are evaluated. We do not want to minimize the importance of addressing seawater intrusion in the LAS, and will continue working with the FCGMA to find viable solutions for this long-term challenge. However, we suggest that the FCGMA coordinate closely with stakeholders to decide whether they would prefer to commence pumping rampdowns immediately (while the FCGMA closes data gaps and evaluates potential future water-supply projects), or if they would prefer to wait until those uncertainties are reduced by 2025, even if pumping rampdowns may be a little steeper due to the delayed start.</p> <p>Sec 2.3.3.4 p 2-32 Poor characterization of connectivity between aquifer and seawater in the north coast area. The aquifers of the Oxnard Plain are believed to crop out on the ocean floor. Seawater intrusion has not been documented in onshore areas, but there is likely some SWI in certain offshore areas where direct documentation is very difficult.</p> <p>Sec 2.3.4 p 2-33 GW quality discussion ignores a lot of historical and recent data by limiting discussion to wells screened only in a single aquifer. It would be helpful to include some discussion related to what trends are apparent in typical production wells that are screened in more than a single aquifer in the UAS or LAS or both. That’s what many well owners experience. DWR’s preference for aquifer-specific discussion does not serve you well here.</p> <p>Sec 2.3.4.3 p 2-36 Incorrect to characterize nitrate problems as sourcing from only historical practices. Nitrate applications remain common in the Oxnard Forebay and other agricultural areas.</p> <p>Sec 2.3.4.3 p 2-37 Look at time series for well 01N22W23R02S. Your statement is factual but lacks context. Nitrate results in this well fluctuate between ND and 20 mg/l, suggesting vertical flow in the well and not LAS aquifer conditions of 20 mg/l in a deep confined setting distant from the Forebay.</p> <p>2.3.4.6 p 2-39 Would be helpful to mention oil deposits are quite shallow in some areas of the Oxnard Plain. Trace oil in deep water wells may be natural and not the result of oilfield practices. Overdraft of the LAS may be promoting upward vertical gradients at depth, so groundwater overdraft would promote this migration of hydrocarbons, not oil production. Language in the plan is correct but a little more context would be helpful.</p>

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Dan	Detmer	UWCD	2 - Basin Setting	2.1- Introduction to Basin Setting	N/A	<p>2.3.7 p 2-43 It is incorrect to map the Lower SCR GDE all the way up the Forebay reach to near Freeman Diversion (Fig 2-52). Why does the figure cite Santa Barbara County as a source, and not TNC or SFEI? Fig 2-52 is inconsistent with TNC mapping and narrative you include as Appendix K. This went through TAG and it was determined that the Forebay area is not a GDE. Also, Figure 2-53 does not adequately delineate the GDE area below RiverPark near HWY 101 from the distributed areas of riparian vegetation upstream in the Forebay.</p> <p>Sec 2.4 p 2-46 United began development of the GW flow model before the passage of SGMA, it was not specifically developed to support the GSP process, although the timing worked out well for that.</p> <p>Section 2.4.2.1</p> <p>The third paragraph of this section summarizes exports from, and imports to, the Oxnard Subbasin by various entities. Notably missing from this summary is information about potential exports from the Oxnard Subbasin by the City of Ventura. Their wells in the vicinity of Ventura Municipal Golf Course pump a significant quantity of groundwater from the Oxnard Subbasin, and that groundwater is blended with other sources to supply residents and businesses primarily in the Mound basin (only a very small fraction of the City's land and population occur within the boundaries of the Oxnard Subbasin). For the sake of completing the export summary, we recommend quantifying how much water pumped by the City of Ventura from the Oxnard Subbasin is exported to and used within Mound or other basins.</p> <p>Sec 2.5 p 2-76 Not much clarity on how management areas might actually be used to help achieve sustainability.</p>
Dan	Detmer	UWCD	1 - Administrative Information	1.1-Purpose of the Groundwater Sustainability Plan	N/A	<p>Sec 1.1, p. 1-2 Not sure a "viable path" is the same as a defensible plan.</p> <p>Sec 1.2.6.1 p 1-6 Should also summarize progress towards developing new projects (not just describe progress to date).</p> <p>Sec 1.4.3 p 1-22 "Water diversion is primarily during large storm events" is not a good characterization of diversion practices at FD. Storm flows are not commonly diverted due to excessive turbidity. United commonly diverts during the recession limb of a storm hydrograph and during baseflow conditions, as allowed per NMFS diversion constraints.</p> <p>Sec 1.6.2 p 1-33. Why no mention of UWCD's routine purchase of Table A allocation of SWP? Only mention of transfers and special purchases. 3150 AF allocation commonly purchased and delivered from Pyramid to Piru (scaled to annual availability).</p>
Dan	Detmer	UWCD	Executive Summary	ES.1- Introduction	N/A	<p>The Executive Summary of the Draft GSP for the Oxnard subbasin focuses solely on seawater intrusion as the driver for development of sustainability criteria, without explaining how undesirable results for the other five sustainability criteria will be avoided. We understand from our participation in the FCGMA's Technical Advisory Group (TAG) that if the pumping reductions proposed in the Draft GSP to achieve minimum thresholds and measurable objectives for seawater intrusion are satisfied, then undesirable results would be avoided for the other five sustainability indicators. However, that concept is not discussed in the Executive Summary of the Draft GSP, and we are concerned that the reader might have difficulty finding it among the other technical details in the main body of the Draft GSP. Therefore, we suggest that FCGMA staff provide a brief explanation in the Executive Summary of how the other sustainability criteria will be met.</p>
Susan	Rungren	City of Ventura/Ventura Water	Executive Summary	ES.1- Introduction	N/A	<p>The "sustainable yield" in the GSP is not consistent with the Water Code and the Emergency Regulations adopted pursuant to the Sustainable Groundwater Management Act (SGMA). On page ES-1, the GSP states that the "sustainable yield" for the Oxnard Subbasin was calculated based on "currently available projects and management actions." This confuses the terms "sustainable yield" and "sustainability goal" as those terms are defined in the Water Code and the Emergency Regulations. The "sustainable yield" for the basin should be revised to reflect that the GSP must include two distinct calculations: (i) a "sustainable yield" that does not include future projects and management actions and which must be based on the "maximum quantity of water, calculated over a base period representative of long-term conditions in the basin and including any temporary surplus, that can be withdrawn annually from a groundwater supply without causing an undesirable result" (Wat. Code, § 10721(w).); and (ii) a "sustainability goal" which incorporates potential future projects and management actions and is calculated based on "the existence and implementation of one or more groundwater sustainability plans that achieve sustainable groundwater management by identifying and causing the implementation of measures targeted to ensure that the applicable basin is operated within its sustainable yield." (Wat. Code, § 10721(u); Cal. Code Regs., tit. 23, § 354.24.)</p>
Susan	Rungren	City of Ventura/Ventura Water	Executive Summary	ES.2- Summary of Basin Setting and Conditions	N/A	<p>The GSP lacks a firm commitment by the other two groundwater management agencies with jurisdiction over portions of the Subbasin outside Agency boundaries. Although the GSP has been prepared for the entire Oxnard Subbasin, certain portions of the Subbasin are outside the Agency's jurisdiction and are under the jurisdiction of either Camrosa OPV GSA or the Oxnard Outlying Area GSA. (GSP, p. ES-2) The GSP does not set out any firm commitment by the other two GSAs to implement the GSP. The City does not question the cooperative working relationship that currently exists between the Agency and the other two GSAs. Given the 20- to 50-year implementation period of the GSP, formal action by each respective GSA board committing to managing groundwater pumping in a manner consistent with the sustainability goal for the Subbasin is necessary to ensure the long-term health of the Subbasin.</p>

Commenter			Chapter	Section	Subsection	Comment
Susan	Rungren	City of Ventura/ Ventura Water	Executive Summary	ES.5-Projects and Management Actions	N/A	The criteria for determining whether the UAS or LAS are experiencing an undesirable result is unclear. On page ES-6, the GSP lists three criteria for each of the UAS and LAS to determine whether the respective aquifer system is experiencing an undesirable result. It is unclear how the three criteria for each aquifer system operate, whether together or independently, or whether on a first-to-occur basis. This needs to be clarified to provide better guidance and eliminate confusion.
Susan	Rungren	City of Ventura/ Ventura Water	1 - Administrative Information	1.1-Purpose of the Groundwater Sustainability Plan	N/A	SGMA requires avoiding undesirable results, not their minimization or mitigation. There are several references in this Chapter and throughout the GSP related to managing the Subbasin in a manner that “limits,” “minimizes” or “mitigates” undesirable results. This standard is legally wrong. SGMA requires avoiding undesirable results by implementing sustainable groundwater management “that can be maintained during the planning and implementation horizon without causing undesirable results.” (Wat. Code, § 10721(v).) Those references need to be changed to comply with SGMA.
Susan	Rungren	City of Ventura/ Ventura Water	Tables	1-1 Estimate of Project Cost and Water Supply for First 5 Years	N/A	Cost estimates need more clarification. The City is unclear whether the cost estimates shown in Table 1-1 and Table 1-2 are for all basins managed by the Agency or whether they are specific to the Oxnard Subbasin. It is also unclear whether the estimated cost per acre-foot shown in Table 1-1 is based on amortized project development costs over the life of the respective project (see attached letter for footnote).
Susan	Rungren	City of Ventura/ Ventura Water	1 - Administrative Information	1.3- Description of Plan Area	1.3.2 Geography	The City’s demographic data should be added to Section 1.3.2.4. The Subbasin is a critical source of water for the City and the population it serves. It currently represents approximately 25-30% of the City’s water supply. Additionally, past, current and projected population statistics and discussion should be modified to include the City’s population and average household size. (GSP, pp. 1-19, 1-20; Table 1-9) This also requires updating the references cited in Section 1.9.
Susan	Rungren	City of Ventura/ Ventura Water	Tables	1-9 Past, Current, and Projected Population for Ventura County, the Cities of Oxnard and Port Hueneme, and the Oxnard Plain	N/A	The City’s demographic data should be added to Section 1.3.2.4. The Subbasin is a critical source of water for the City and the population it serves. It currently represents approximately 25-30% of the City’s water supply. Additionally, past, current and projected population statistics and discussion should be modified to include the City’s population and average household size. (GSP, pp. 1-19, 1-20; Table 1-9) This also requires updating the references cited in Section 1.9.
Susan	Rungren	City of Ventura/ Ventura Water	1 - Administrative Information	1.9- References Cited	N/A	The City’s demographic data should be added to Section 1.3.2.4. The Subbasin is a critical source of water for the City and the population it serves. It currently represents approximately 25-30% of the City’s water supply. Additionally, past, current and projected population statistics and discussion should be modified to include the City’s population and average household size. (GSP, pp. 1-19, 1-20; Table 1-9) This also requires updating the references cited in Section 1.9.

Commenter		Chapter	Section	Subsection	Comment
Susan Rungren	City of Ventura/Ventura Water	1 - Administrative Information	1.4-Existing Monitoring and Management Plans	1.4.3 Operational Flexibility Limitations	Section 1.4.3 should be modified to more accurately reflect the progression of groundwater management and the operational flexibility that has historically occurred. The second paragraph under that section should be modified as follows (underlined text is to be added, strikethrough is to be deleted): “For the Oxnard Subbasin, water purveyors collectively draw from a combination of sources—including local surface water, groundwater, imports from the State Water Project (SWP), and increasingly, recycled water—which differ in terms of the volume available, area served, timing of peak availability, and reliability. Climate and regulatory constraints (e.g., water quality standards, water rights, and minimum environmental flows) have historically had a greater impact on the availability of surface water supplies, whereas groundwater sources with adequate water quality were historically limited only by the capacity of production wells accessing the aquifer, until 1991 when FCGMA initiated a groundwater allocation reduction system. leading to pumping in excess of many basins’ sustainable yield. With the passage of SGMA and the sustainable management criteria established in this GSP (Chapter 3), once adopted, groundwater extraction will be further limited by minimum thresholds established for each sustainability indicator. FCGMA has exercised its authority to limit groundwater production since 1983, and thus has managed the basin in an effort to avoid critical overdraft. Because in 2015 the State Department of Water Resources listed the Oxnard Subbasin as being in a state of Critical Overdraft, the sustainable management criteria adopted in this GSP may limit operational flexibility by further reducing allowable groundwater production.” (GSP, p. 1-21) (see attached comment letter to view formatted text).
Susan Rungren	City of Ventura/Ventura Water	1 - Administrative Information	1.6-Land Use Elements or Topic Categories of Applicable General Plans	1.6.1 General Plans	Section 1.6.1 needs to be modified to more accurately describe the impact of General Plans on the GSP. The first sentence needs to be modified as follows, consistent with Cal. Code Regs., tit. 23, § 354.8 (underlined text is to be added, strikethrough is to be deleted): “General plans are considered applicable to the GSP if they have the potential to direct urban growth, zoning changes, or redevelopment anywhere to the extent they may change water demands within the Subbasin or affect the ability of the Agency to achieve sustainable groundwater management over the planning and implementation horizon.” The City of Ventura’s general plan should also be added to the list of general plans applicable to the Oxnard Subbasin. (GSP, p. 1-27) (see attached comment letter for formatted text).
Susan Rungren	City of Ventura/Ventura Water	1 - Administrative Information	1.6-Land Use Elements or Topic Categories of Applicable General Plans	1.6.2 Urban Water Management Plans	f. Section 1.6.2 needs to be modified to more accurately describe the City’s UWMP. <ul style="list-style-type: none"> • The first sentence of the second paragraph on page 1-37 should read, “VWD’s supplies are from Lake Casitas, the Ventura River, groundwater, and reclamation facilities.” • The City’s current allocation of 3,862 has been reduced since 2016, not 2018. This should be corrected at the top of page 1-38. • There is a typographical error near the end of the second paragraph: the phrase “wastewater prohibition” should be “water waste prohibition.” • The reference to the Mound Groundwater Basin on page 1-38 should be removed; the City is permitted to utilize water pumped from its wells within the Oxnard Plain basin throughout its service area, not just within the Mound Basin. • The text discusses the City’s use of groundwater from the Oxnard Subbasin, and then notes, “these continued extractions will need to be addressed as part of FCGMA’s ongoing efforts to sustainably manage groundwater in the Oxnard Subbasin. However, the extraction has historically been subject to FCGMA management ordinances and will be subject to future FCGMA policies.” These statements must be either deleted or added to other parts of the GSP where pumping by other than the City is discussed because they are applicable to every pumper in the Subbasin.
Susan Rungren	City of Ventura/Ventura Water	1 - Administrative Information	1.7-Well Permitting Policies and Procedures	1.7.1 FCGMA	Section 1.7 needs to be modified to include City’s well permitting policies and procedures. In addition to County of Ventura and Agency requirements, a permit in the form of a well agreement with the City is required to construct a well within the City of Ventura’s jurisdictional boundary.
Susan Rungren	City of Ventura/Ventura Water	Tables	1-4 Summary of Land Ownership in the Oxnard Subbasin	N/A	Table 1-4 should be corrected by changing “Ventura Water District” to “Ventura Water Department.” (GSP, p. 1-56)

Commenter			Chapter	Section	Subsection	Comment
Susan Rungren	City of Ventura/Ventura Water	Figures	1-2 Administrative Boundaries for the Oxnard Subbasin	N/A	The northern boundary between Oxnard Subbasin and Mound Subbasin should reflect most recent boundary changes applied for by Mound Basin Groundwater Sustainability Agency and accepted by DWR in February 2019.	
Susan Rungren	City of Ventura/Ventura Water	Figures	1-3 Weather Station and Stream Gauge Locations	N/A	Figure 1-3 should be corrected. The key shows a red star for the Freeman Diversion, but there are several red stars on the figure. Please revise as appropriate.	
Susan Rungren	City of Ventura/Ventura Water	2 - Basin Setting	2.1- Introduction to Basin Setting	N/A	Reference to “DWR GSP Regulations, Section 354.14” should be corrected to more accurately reflect the regulations’ requirements. The GSP states that the “discussion of groundwater elevation is limited to production and monitoring wells screened in a single aquifer” in order to “conform with the DWR GSP Regulations, Section 354.14.” (GSP, p. 2-13) The correct regulation section is 354.16 (Cal. Code Regs., tit. 23, § 354.16(a).) Please note that the language used in the regulation does not create a limitation as stated in the GSP, rather it requires a description of current and historical groundwater conditions in the Subbasin “including . . . groundwater elevation . . . for each principal aquifer within the basin.” (Cal. Code Regs., tit. 23, § 354.16(a)(1).)	
Susan Rungren	City of Ventura/Ventura Water	2 - Basin Setting	2.3- Groundwater Conditions	2.3.2 Estimated Change in Storage	Section 2.3.2 needs to be corrected. From the discussion it appears that Figure 2-24 should be titled “With Coastal Flux” not without coastal flux because it includes seawater intrusion. (GSP, p. 2-26)	
Susan Rungren	City of Ventura/Ventura Water	Figures	2-24 Oxnard Subbasin Annual Change in Storage Without Coastal Flux	N/A	Section 2.3.2 needs to be corrected. From the discussion it appears that Figure 2-24 should be titled “With Coastal Flux” not without coastal flux because it includes seawater intrusion. (GSP, p. 2-26)	
Susan Rungren	City of Ventura/Ventura Water	2 - Basin Setting	2.4-Water Budget	2.4.1 Sources of Water	Section 2.4.1 needs to be corrected. In the first sentence of the fourth paragraph, the City of Ventura needs to be added as a predominant municipal water supplier. Also, please revise the sentence about the City later in the fourth paragraph to read in full as follows: “The City of Ventura also has wells in the Oxnard Subbasin.” The remainder of that sentence as written needs to be deleted because portions of the City’s water service area are within the Subbasin (alternatively, the sentence must be modified to clarify that the City’s water service area is both within and outside the Oxnard Subbasin). (GSP, p. 2-47)	

Commenter			Chapter	Section	Subsection	Comment
Susan	Rungren	City of Ventura/Ventura Water	2 - Basin Setting		2.4.5 Projected Future Water Budget and Sustainable Yield	Information regarding model scenarios in Section 2.4.5 needs clarification. It is assumed that these scenarios are conceptual in nature for the exercise of bracketing sustainable yield estimates. It is not clear how the Agency can reduce pumping differentially between wells based on the aquifer system they pump from without implementing projects to replace their supply. (GSP, p. 2-62) This is particularly true since the Agency had mandated in the 1980's and early 1990's that pumpers replace wells pumping from the UAS with wells that pump from the LAS.
Susan	Rungren	City of Ventura/Ventura Water	3 - Sustainable Management Criteria	3.1- Introduction to Sustainable Management Criteria	N/A	Statements that undesirable results may occur between 2020 and 2039 are inconsistent with SGMA. There are numerous statements in Chapter 3 and throughout the GSP that presume that the occurrence of undesirable results between 2020 and 2039 is allowed under SGMA. This is not accurate. SGMA requires that the GSP outlines measures to be taken by the Agency in order to "achieve the sustainability goal in the basin within 20 years of the implementation of the plan." (Wat. Code, § 10727.2.) The sustainability goal "culminates in the absence of undesirable results within 20 years" of the implementation of the GSP. (Cal. Code Regs., tit. 23, § 354.24.) These requirements do not translate to permitting undesirable results up until the year 2039. Such interpretation does not take into consideration the length of time needed to rectify the undesirable result and implies that one year may be sufficient (because undesirable results should not occur beginning with the year 2040.). Further, assuming this GSP is approved, DWR has the authority to declare, at a future time, the approved GSP as either "incomplete" or "inadequate" following its periodic review of the Agency's progress towards achieving the sustainability goal for the Subbasin. (Cal. Code Regs., tit. 23, § 355.6(d).) One of the key criteria for DWR to make such future determination is whether "the exceedances of any minimum thresholds or failure to meet any interim milestones are likely to affect the ability of the Agency to achieve the sustainability goal for the basin." (Cal. Code Regs., tit. 23, § 355.6(c)(1).) An "incomplete" or "inadequate" determination by DWR may result in intervention by the State Water Resources Control Board as authorized under the Water Code. (Wat. Code, § D. 6, Pt. 2.74, Ch. 11.) The City does not support the proposition in the GSP that undesirable results may occur up until the year 2039 because it is not founded on best available information and best available science, as required by SGMA. Additionally, all references in the GSP to avoiding one or more undesirable results "after 2040" are vague because "after 2040" could mean any time period, and should be corrected to say that undesirable result would not occur "beginning in 2040," consistent with SGMA.
Susan	Rungren	City of Ventura/Ventura Water	3 - Sustainable Management Criteria	3.2- Sustainability Goal	N/A	Potential economic disruption to municipal and industrial users must be considered. In Section 3.2, the GSP states that the proposed reductions must take into account the "potential economic disruption to the agricultural industry." (GSP, p. 3-2, paragraph 4.) This statement largely ignores potential impacts on the more than half million people who depend, in varying degrees, on Oxnard Subbasin water. The City proposes correcting the first sentence in that paragraph to read (underlined text is added): "Proposed reductions in groundwater production must take into account both the potential economic disruption to the agricultural industry in the Subbasin, the interference with municipal water supply planning and rate setting, and the uncertainty in the estimated sustainable yield of the Subbasin." Harm to municipal and industrial users should also be addressed in other portions of Chapter 3 where only harm to agricultural users are considered (e.g., Section 3.4.3 and others).
Susan	Rungren	City of Ventura/Ventura Water	3 - Sustainable Management Criteria	3.1- Introduction to Sustainable Management Criteria	N/A	Any proposed reduction in production must be consistent with California water rights law. Compliance with SGMA does not exempt the Agency from complying with California water rights law. (Wat. Code, § 10720.5.) The GSP states in this Chapter and in other portions that the Agency is contemplating reducing production linearly over the 20-year GSP implementation period. (GSP, p. 3-2 and other sections) Established case law upheld reduction in groundwater production to safe yield that spans over a period ranging between 5 and 7 years. This is an important consideration for the Agency in terms of achieving the sustainability goal of the Subbasin. It informs the Agency's strategy in fulfilling its obligations under SGMA by necessitating the Agency to look at projects as the principal mechanism for bringing the Subbasin's yield to a sustainable level. The City reiterates its position that any proposed reduction in production must take into account production cutbacks and water conservation measure implemented by the City, especially during the recent drought.
Susan	Rungren	City of Ventura/Ventura Water	3 - Sustainable Management Criteria	3.2- Sustainability Goal	N/A	Section 3.2 needs to be corrected. In the fourth paragraph, the fourth sentence should be modified to state that the reduction in groundwater production over the first 5 years is approximately 900 AFY or 4,500 AF, not 4,500 AFY.
Susan	Rungren	City of Ventura/Ventura Water	3 - Sustainable Management Criteria	3.3- Undesirable Results	3.3.7 Defining Subbasin-Wide Undesirable Results	Section 3.3.7 needs to be corrected. On page 3-12, in the first paragraph, it states that, "...water levels in 6 of the 15 key wells...." However, the number of hydrographs for UAS wells shown in Figures 3-7a and 3-7b are only 14 wells. Either the sentence or the figures need to be corrected. (GSP, p. 3-12)

Commenter		Chapter	Section	Subsection	Comment
Susan Rungren	City of Ventura/Ventura Water	3 - Sustainable Management Criteria	3.4-Minimum Thresholds	3.4.1 Chronic Lowering of Groundwater Levels	Statement regarding groundwater elevations with and without projects is inaccurate. The GSP states in Section 3.4 that “In general, the simulated groundwater elevations in the model scenario with projects were close to those in the scenario without projects, with any observed difference between the two limited to less than approximately 10 feet.” (GSP, p. 3-14, first paragraph) This statement in the GSP does not recognize the difference between the scenarios as significant. An elevation differential of 5 to 10 feet along the coast is significant. In addition, the statement does not recognize that the impacts to groundwater users without the projects is vastly greater than with the projects.
Susan Rungren	City of Ventura/Ventura Water	3 - Sustainable Management Criteria	3.4-Minimum Thresholds	3.4.1 Chronic Lowering of Groundwater Levels	Model assumptions must be recognized as a source of uncertainty in the model predictions. The GSP does not mention the model assumptions, which are the basis upon which model outputs are generated and thus the GSP relies, are a source of uncertainty as well. The City recommends that the following language be added to the last paragraph of Section 3.4 (p. 3-14): “There are also several ambiguities associated with the model’s underlying assumptions, including but not limited to reported pumping, Subbasin boundary conditions, amount of seawater intrusion (flux at the coastline), tile drain discharges, and aquifer specific changes in storage resulting from changing groundwater elevations that add to the uncertainty of the modeling predictions.”
Susan Rungren	City of Ventura/Ventura Water	3 - Sustainable Management Criteria	3.5-Measurable Objectives	3.5.1 Chronic Lowering of Groundwater Levels	Measurable Objectives Unclear. In Section 3.5, the GSP states that, “to prevent seawater intrusion after 2040, observed groundwater levels should be above the measurable objective 50% of the time.” It is not clear how the 50% standard was determined or whether it was based on best available information and best available science as required by SGMA. (GSP, p. 3-21)
Susan Rungren	City of Ventura/Ventura Water	4 - Monitoring Networks	4.3-Monitoring Network Relationship to Sustainability Indicators	4.3.1 Chronic Lowering of Groundwater Levels	Reliance on groundwater elevations requires further equipping of all key wells. The recording of groundwater elevations as a mechanism for tracking progress towards reaching the sustainability goal for the Subbasin requires equipping all the key wells with pressure transducers for measurement accuracy and a higher temporal resolution in the data. This technical necessity needs to be reflected in Section 4.3.1 and any other GSP sections advancing this concept.
Susan Rungren	City of Ventura/Ventura Water	4 - Monitoring Networks	4.6-Potential Monitoring Network Improvements	4.6.1 Water Level Measurements: Spatial Data Gaps	Reference to the “northwestern Subbasin” needs to be corrected. In Section 4.6.1, p. 4-13, fourth paragraph, the last sentence in that paragraph references the “northwestern Subbasin” which needs to be corrected as no such Subbasin exists in Ventura County.
Susan Rungren	City of Ventura/Ventura Water	5 - Project Management Actions	5.1-Introduction to Projects and Management Actions	N/A	Information regarding potential projects is not sufficient to meet SGMA requirements. In section 5.1, the GSP makes clear that the “inclusion of . . . projects does not constitute a commitment” by the Agency Board “to construct or fund the projects” and the timing of the management actions is ambiguous. SGMA requires that projects “shall be supported by best available information and best available science.” (Cal. Code Regs., tit. 23, § 354.44(c).) SGMA also requires, among other things, that any projects identified in the GSP be accompanied with a “description the circumstances under which projects or management actions shall be implemented, the criteria that would trigger implementation and termination of projects or management actions, and the process by which the Agency shall determine that conditions requiring the implementation of particular projects or management actions have occurred” as well as, for each project, a “time-table for expected initiation and completion, and the accrual of expected benefits.” (Cal. Code Regs., tit. 23, § 354.44(b)(1)(A) and (b)(4).) The Agency must achieve this level of clarity at least as part of its next report to DWR or risk a negative determination by DWR as to the adequacy of the GSP and potential intervention by the State. (Cal. Code Regs., tit. 23, § 355.2(e); Wat. Code, § D. 6, Pt. 2.74, Ch. 11.) (GSP, pp. ES-8, 9; and Chapter 5.)

Commenter		Chapter	Section	Subsection	Comment	
Susan	Rungren	City of Ventura/Ventura Water	5 - Project Management Actions	5.1- Introduction to Projects and Management Actions	N/A	No clearly articulated direction regarding the proposed projects or management actions to achieve the sustainability goal. As mentioned above, SGMA requires specificity as to project triggers and timetables. It is also unclear how the other two GSAs will contribute to projects or implement management actions consistent with the goal of bringing the Subbasin to sustainability. No projects have been identified that would either increase or maintain groundwater production at the presently reduced historical low levels (at least for certain producers). The GSP identifies a range of options under existing conditions, but no clear direction as to how the Agency intends to achieve sustainability without a significant disruption to all overlying users. If the contemplated groundwater allocation system proposed under Management Action No. 1 were included in the GSP, the City and other stakeholders could better evaluate the potential magnitude and timing of projects that need to be developed to lessen those impacts on overlying users. Absent such clarity, it is not possible to adequately comment on the projects and management actions, as currently presented in the GSP.
Susan	Rungren	City of Ventura/Ventura Water	5 - Project Management Actions	5.1- Introduction to Projects and Management Actions	N/A	Process for identifying projects should be improved. The City understands that the Agency’s enabling legislation had limited its ability to fund and implement projects. However, as a GSA, the Agency is required under SGMA to assume a leadership role in developing projects that will reduce the need for excessive reductions in pumping allocations in the Subbasin.
Susan	Rungren	City of Ventura/Ventura Water	5 - Project Management Actions	5.4-Project No. 3 – RiverPark– Saticoy GRRP Recycled Water Project	N/A	UWCD is not authorized to impose or administer charges on Subbasin users for GSP projects. In discussing the economic impacts of Project No. 3 under Section 5.4.6, the GSP states that “These operating costs are anticipated to be provided by a pump charge administered either by UWCD or FCGMA.” Any charges for GSP projects should be imposed and administered through by the Agency, not UWCD, and by following the proper statutory process. This statement in the GSP and any other similar statements in the GSP must be corrected.
Susan	Rungren	City of Ventura/Ventura Water	5 - Project Management Actions	5.7- Management Action No. 1 – Reduction in Groundwater Production	N/A	Timing and scope of the proposed management actions are unclear. It is unclear to the City if, when and how the two proposed management actions will be implemented. SGMA requires that management actions “shall be supported by best available information and best available science.” (Cal. Code Regs., tit. 23, § 354.44(c).) To that end, with respect to the management action involving reduction in groundwater production, the City is of the position that any such management action must take into account reductions and conservation measures already implemented by the City and other municipal water providers, including those taken in compliance with the state-mandated requirements imposed during the recent drought period. Indeed, the Agency has applied this management action since 1991 to those pumpers who were limited to a specific historical allocation. Pumpers that could file for an efficiency allocation were allowed to increase their extraction of groundwater as long as the Agency deemed their use efficient. There has been considerable discussion between groundwater pumpers and Agency staff regarding the development of a pumping allocation system, which may include a reduction in groundwater production. The City reserves the right to comment about such system at a later time, including its equitable application among pumpers. It is not possible to adequately analyze or comment on this management action given the insufficient information provided in the GSP and the ambiguity regarding the timing and scope of its implementation. If the timing and scope of proposed management actions cannot be included in the GSP, they must be removed as they do not meet SGMA requirements.
Susan	Rungren	City of Ventura/Ventura Water	5 - Project Management Actions	5.7- Management Action No. 1 – Reduction in Groundwater Production	N/A	Uncertainty of model predictions must be considered before the Agency implements Management Action No.1. As noted on page 5-15, there are considerable uncertainties in the groundwater production rates that will prevent net seawater intrusion between the model scenarios chosen. The UAS estimates have an uncertainty of 12.8% to 18.75%, and the LAS has an uncertainty of 32.8% to 51.4%. As pointed out above, there are also uncertainties in the modeling assumptions and underlying data utilized in the model. In addition, the GSP states that, “The 1930 to 1979 50-year period with the 2070 DWR climate-change factor was found to be the most conservative and was used for the comparison with the other modeling simulations conducted.” The City asks that the Agency keeps these uncertainties in mind when considering pumping reductions as a GSP management action. The Agency must consider investing in studies to fill data gaps and minimize uncertainties before imposing arbitrary pumping restrictions unaccompanied by projects.
Susan	Rungren	City of Ventura/Ventura Water	5 - Project Management Actions	5.1- Introduction to Projects and Management Actions	N/A	Missing Management Action No. 2. There appears to be a deleted or missing section in the GSP. The section numbering goes from Section 5.7 to Section 5.9, omitting Section 5.8. The City proposes considering a Water Market for municipal and industrial groundwater users as a management action and believes that such management action is necessary for more efficient coordination and conjunctive use of water. The City urges the Agency to include this as a potential management action.

Commenter			Chapter	Section	Subsection	Comment
Amanda	Fagan	Naval Base Ventura County	Executive Summary	ES.2- Summary of Basin Setting and Conditions	N/A	<p>Page ES-4.</p> <p>CONTEXT: The results of each of these scenarios indicated that continuing the 2015–2017 extraction rate would contribute to net seawater intrusion in both the Upper Aquifer System and Lower Aquifer System. In three additional scenarios, the groundwater production rate was decreased gradually over the first 20 years.</p> <p>COMMENT: There are 8 scenarios available through the Department of Water Resources (DWR) for future climate scenarios. Instead, FCGMA staff ran only 3. The GMA should test all climate scenarios to have a representative data set instead of just choosing the most conservative.</p>
Amanda	Fagan	Naval Base Ventura County	Executive Summary	ES.3- Overview of Sustainability Criteria	N/A	<p>Page ES-6.</p> <p>CONTEXT: In any single monitoring event, groundwater levels in 6 of 15 identified key wells are below their respective minimum thresholds.</p> <p>COMMENT: Will the GSP be updated if more wells are added prior to the 5 year review?</p>
Amanda	Fagan	Naval Base Ventura County	Executive Summary	ES.3- Overview of Sustainability Criteria	N/A	<p>Page ES-6.</p> <p>CONTEXT: The groundwater level in any individual key well is below the minimum threshold for either three consecutive monitoring events or three of five consecutive monitoring events, which occur in the spring and fall of each year.</p> <p>COMMENT: Droughts are 3-5 years on average, so how will this be taken into account? Stringent reductions in a wet year? Will consecutive years be used, or measurement periods (3 to 5 years, or 1.5 to 3 years)?</p>
Amanda	Fagan	Naval Base Ventura County	Executive Summary	ES.3- Overview of Sustainability Criteria	N/A	<p>Page ES-6.</p> <p>CONTEXT: The Lower Aquifer System would be determined to be experiencing an undesirable result if:</p> <ul style="list-style-type: none"> • In any single monitoring event, groundwater levels in 8 of 19 identified key wells are below their respective minimum thresholds. • The groundwater level in any individual key well is below the minimum threshold for either three consecutive monitoring events or three of five consecutive monitoring events, which occur in the spring and fall of each year. <p>COMMENT: Will the GSP be updated if more wells are added prior to the 5 year review? How will other items be considered if only one well is impacts (localized lows due to other well pumping rather than regional indications)?</p>
Amanda	Fagan	Naval Base Ventura County	Executive Summary	ES.4- Overview of the Subbasin Monitoring Network	N/A	<p>Page ES-8.</p> <p>CONTEXT: Pressure transducer records provide the high-temporal resolution data that allows for a better understanding of water level dynamics in the wells related to groundwater production, groundwater management activities, and climatic influence.</p> <p>COMMENT: Navy Subject Matter Expert (NAVFAC EXWC hydrogeologist) highly encourages this. Without clear temporal understanding in such a seasonal environment, they will be hampered by potentially overemphasizing summer declines and a lack of understanding of infiltration (which is currently treated as immediately entering the aquifer even though this is unrealistic).</p>

Commenter			Chapter	Section	Subsection	Comment
Amanda	Fagan	Naval Base Ventura County	1 - Administrative Information	1.2-Agency Information	1.2.6 Groundwater Sustainability Plan Implementation and Cost Estimate	<p>Page 1-6 / 1-7.</p> <p>CONTEXT: (1) FCGMA will evaluate the GSP at least every 5 years. This 5-year evaluation will be provided as a written assessment to DWR. The assessment shall describe whether the Plan implementation, including implementation of projects and management actions, are meeting the sustainability goal in the basin. The evaluation will include the following: (2) During the initial 5-year period after the GSP is adopted, FCGMA will explore options for filling data gaps identified in this GSP. The primary data gaps identified in the historical data are spatial and temporal gaps in groundwater elevation and groundwater quality measurements.</p> <p>COMMENT: (1) This section could benefit from a “report card” summary of the sustainability goals with a simple yes/no if the goal was met or not for all of the basins within the groundwater management area. (2) Naval Base Ventura County may share relevant data as it becomes available to help refine FCGMA analysis.</p>
Amanda	Fagan	Naval Base Ventura County	1 - Administrative Information	1.2-Agency Information	1.2.1 Agency Name	<p>Page 1-7.</p> <p>CONTEXT: “to the degree that monitoring schedules and locations will change, a cost-sharing agreement will be developed between VCWPD and FCGMA”</p> <p>COMMENT: FCGMA has not had monitoring expenditures up to this point, since a majority of the data required is already available and collected by UWCD and VCWPD. It is worth noting this will be a driver in increasing monitoring costs. Additional clarification should be added as to when and how this cost sharing will be put into place, and whether it will be considered O&M or GSP specific work.</p>
Amanda	Fagan	Naval Base Ventura County	1 - Administrative Information	1.2-Agency Information	1.2.1 Agency Name	<p>Page 1-10.</p> <p>CONTEXT: In general, FCGMA plans to fund its basic operations costs using groundwater extraction charges. Surcharges for extractions in excess of an allocation may also be used in carrying out FCGMA’s groundwater management functions. FCGMA collects a groundwater extraction fee of \$6 per acre-foot and imposes a surcharge of up to \$1,961 for excess extractions.</p> <p>COMMENT: Clarify this statement. Is \$6/acre-ft the surcharge or the base rate? If it is the surcharge, what is the base rate? How is the surcharge scaled with surplus use?</p>
Amanda	Fagan	Naval Base Ventura County	1 - Administrative Information	1.3-Description of Plan Area	1.3.2 Geography	<p>Page 1-18.</p> <p>CONTEXT: Urban and residential land uses are concentrated in Oxnard and Port Hueneme. Federal lands consist of the Naval Base Ventura County, which is a United States Navy base located south of Oxnard. The base was formed in 2000 through the merger of Naval Air Station Point Mugu (located in the southern portion of the Oxnard Plain) and Naval Construction Battalion Center Port Hueneme (located in the west-central part of the Oxnard Plain along the coast). Currently, there are about 19,000 military, civilian, and contract personnel working or stationed at Naval Base Ventura County (City of Oxnard 2011).</p> <p>COMMENT: Naval Base Ventura County (NBVC) has two primary operating locations within the Oxnard Subbasin, Point Mugu and Port Hueneme. NBVC Port Hueneme is located within the City of Port Hueneme, and NBVC Point Mugu is located in unincorporated Ventura County, generally southeast of Oxnard.</p> <p>The NBVC Economic Impact Assessment (2018) identified approximately 14,600 military, civilian, and contractor employees, based on Fiscal Year 2015 data. NBVC also has 1,344 total housing units (residences). However, it is important to note that the NBVC base population fluctuates with assigned missions and requirements.</p>
Amanda	Fagan	Naval Base Ventura County	1 - Administrative Information	1.8-Notification and Communication	1.8.2 Summary of Beneficial Uses and Users	<p>Page 1-47.</p> <p>CONTEXT: The Federal Government. As discussed in Section 1.3.2.3, the federal government is a landowner and groundwater user in the Oxnard Basin through the Naval Base Ventura County. Representatives from the U.S. Navy have been coordinating with FCGMA staff regarding the development of the GSP, have participated in FCGMA public meetings, and are on the list of interested parties who receive electronic newsletters regarding the status and development of the Oxnard Subbasin GSP.</p> <p>COMMENT: Channel Islands Air National Guard Station (U.S. Air Force / California Air National Guard) is also a federal landowner and groundwater user in the Oxnard Basin, independent of Naval Base Ventura County. CIANGS does receive its drinking water through NBVC, but has its own groundwater extraction well on its property.</p>

Commenter			Chapter	Section	Subsection	Comment
Amanda	Fagan	Naval Base Ventura County	Tables	1-2 Groundwater Sustainability Plan Estimated Implementation Cost through 2040	N/A	<p>Page 1-55.</p> <p>CONTEXT: The monitoring costs annually are value at \$1,000,000 per year starting in 2020. There is about a 2.5% increase every year in the cost likely to account for inflation.</p> <p>COMMENT: The Operation and Monitoring costs do not reflect any increase in cost for the start of the monitoring cost-sharing program mentioned on page 1-7. Is it assumed that the cost-sharing program has already started before 2020 and that the costs will remain constant?</p>
Amanda	Fagan	Naval Base Ventura County	Tables	1-6 Oxnard Plain Precipitation Station Information	N/A	<p>Page 1-58. Table 1-6.</p> <p>CONTEXT: Oxnard Plain Precipitation Station Information</p> <p>COMMENT: No relation is present between precipitation and location based on the data provided. All precipitation is therefore likely about the same in this area and/or not impacted by elevation.</p>
Amanda	Fagan	Naval Base Ventura County	Figures	1-6 Long-Term Precipitation Trends in the Oxnard Plain	N/A	<p>Page 1-83. Figure 1-6.</p> <p>COMMENT: Consider compressing the primary y-axis (say 0 – 40” instead of 0 – 140”) so resolution of annual precipitation is better. Make colors/line type in the legend consistent with the figure (e.g. mean precipitation is shown in the figure as a solid line but is a dashed line in the legend).</p>
Amanda	Fagan	Naval Base Ventura County	2 - Basin Setting	2.2- Hydrogeologic Conceptual Model	2.2.3 Principal Aquifers and Aquitards	<p>Page 2-6.</p> <p>CONTEXT: River-deposited sands and gravels interbedded with minor silt and clay compose the semi-perched aquifer in the Oxnard Subbasin (DWR 1965; Turner 1975). The term “semi-perched aquifer” is used in this GSP as the name for the uppermost unit of the Oxnard Subbasin, which overlies the extensive clay cap in the pressure plain area of the Oxnard Subbasin (Figure 2-2 and Table 2-1). This name was used in the State Water Resources Control Board’s Bulletin 12 (SWRCB 1956) to distinguish the water-bearing sedimentary units in the pressure plain area from those in the Forebay area, and this terminology has been adopted by subsequent investigators (Mukae and Turner 1975; Turner 1975; Hanson et al. 2003; DWR 2006). Water-level data indicate that the sediments underlying the semi-perched aquifer are saturated. Therefore, the term “semi-perched aquifer” is used in this GSP to denote the limited migration of water from the uppermost aquifer to the underlying confined aquifer in the pressure plain area.</p> <p>COMMENT: Semi-perched systems can result in delayed or minimized infiltration into the units below (i.e. the prime aquifer zones). Therefore it is likely that infiltration will be slower and "less" than the totals flowing in. The current model does not allow for these potential time lags or reductions in infiltration estimates. This could significantly impact their model’s ability to predict aquifer rebound. We recommend that they study this through the use of continuous transducers, or additional work, as this could cause decreases to trigger more often when in reality recharge is just delayed in reaching the deeper zones.</p>
Amanda	Fagan	Naval Base Ventura County	2 - Basin Setting	2.2- Hydrogeologic Conceptual Model	2.2.4 Data Gaps and Uncertainty in the Hydrogeologic Conceptual Model	<p>Page 2-12.</p> <p>CONTEXT: “Potential impacts of increased production in the semi-perched aquifer”</p> <p>COMMENT: (1) Is there really production coming out of the semi-perched? Or does this refer to discharge from the French/tile drains in the agricultural fields? This should be clarified. Furthermore, the semi-perched zone is not considered in this GSP, therefore why do the impacts matter? (2) There is limited mention of uncertainty in the climate conditions used or the limitations of using only two climate scenarios. There should be a paragraph or section at least explaining any uncertainty associated with the climate assumptions.</p>

Commenter			Chapter	Section	Subsection	Comment
Amanda	Fagan	Naval Base Ventura County	2 - Basin Setting	2.4-Water Budget	2.4.2 Sources of Water Discharge	Page 2-55. Error! Reference source not found. Please fix reference error.
Amanda	Fagan	Naval Base Ventura County	2 - Basin Setting	2.4-Water Budget	2.4.5 Projected Future Water Budget and Sustainable Yield	Page 2-62. CONTEXT: There is a preference to reduce the Oxnard LAS and UAS more than the connected PVB LAS and UAS and the WLPMA LAS. There are four reduction scenarios and in each scenario the reduction is double if not more in the Oxnard basin than PVB and WLPMA. Each scenario's results mentions a steady migration of salt water in the LAS regardless of the scenario. COMMENT: Has UWCD or Dudek run any scenarios where Oxnard, PVB, WLPMA, and Oxnard LAS aquifers are reduced the same amount? Despite the fact that the GSP is not setting the extraction reductions, the concern is that the extraction reductions would be roughly based off of modelled scenarios. In this case, the burden of the highest LAS reductions could be unfairly lumped on the Oxnard Sub-basin LAS users. More scenarios are recommended.
Amanda	Fagan	Naval Base Ventura County	2 - Basin Setting	2.4-Water Budget	2.4.5 Projected Future Water Budget and Sustainable Yield	Page 2-65. CONTEXT: Oxnard LAS aquifers are reduced the same amount? Despite the fact that the GSP is not setting the extraction reductions, the concern is that the extraction reductions would be roughly based off of modelled scenarios. In this case, the burden of the highest LAS reductions could be unfairly lumped on the Oxnard Sub-basin LAS users. More scenarios are recommended. COMMENT: Recommend including this statement in the executive summary, as well as any other comments directly related to the past or present sustainability status of the basin. Executive summary 3 does a fine job describing the sustainability criteria but does not explain the state of basin given the criteria described in this GSP.
Amanda	Fagan	Naval Base Ventura County	Figures	2-12 Groundwater Well Hydrographs in the Mugu Aquifer	N/A	Page 2-135. Figure 2-12. CONTEXT: Groundwater Well Hydrographs in the Mugu Aquifer COMMENT: Appears to show partially confined conditions as some wells recover, but others don't.
Amanda	Fagan	Naval Base Ventura County	Figures	2-18 Groundwater Well Hydrographs in the Fox Canyon Aquifer	N/A	Page 2-149. Figure 2-18. CONTEXT: Groundwater Well Hydrographs in the Fox Canyon Aquifer COMMENT: Appears to show partially confined conditions as some wells recover, but others don't.
Amanda	Fagan	Naval Base Ventura County	Figures	2-22 Oxnard Subbasin Annual Change in Storage	N/A	Page 2-155. Figure 2-22. CONTEXT: Oxnard Subbasin Annual Change in Storage COMMENT: This figure shows 12 driest years, 7 dry years, 6 wet years, 5 wettest years. This is clearly biased toward dry years.

Commenter			Chapter	Section	Subsection	Comment
Amanda	Fagan	Naval Base Ventura County	3 - Sustainable Management Criteria	3.3- Undesirable Results	3.3.1 Chronic Lowering of Groundwater Levels	<p>Page 3-4.</p> <p>CONTEXT: In addition to surface-water spreading, seawater intrusion into the aquifers of the Oxnard Subbasin has also sustained groundwater levels. Unlike surface-water spreading, seawater intrusion sustains groundwater levels at the expense of freshwater storage in the Subbasin (Section 2.3.3). Water levels in the aquifers of the LAS have remained below sea level even during drought recovery periods, thereby continuing to allow migration of seawater into the Subbasin near the Mugu and Hueneme Submarine Canyons (Section 2.3, Groundwater Conditions). Continued seawater intrusion has reduced the amount of freshwater in storage in the Subbasin.</p> <p>COMMENT: NBVC may consider potential recharge location(s) on base to partner with FCGMA and other local agencies, such as for storm water/sewer discharges.</p>
Amanda	Fagan	Naval Base Ventura County	3 - Sustainable Management Criteria	3.3- Undesirable Results	3.3.5 Land Subsidence	<p>Page 3-10.</p> <p>There is no mention of Land Subsidence (aquifer compaction) as an impact on storage capacity. The lack of detail on aquifer compaction, underplays the impact subsidence can have on aquifer storage.</p>
Amanda	Fagan	Naval Base Ventura County	3 - Sustainable Management Criteria	3.4-Minimum Thresholds	3.4.1 Chronic Lowering of Groundwater Levels	<p>Page 3-14.</p> <p>CONTEXT: "The minimum threshold groundwater elevations selected to protect against net seawater intrusion in the UAS and LAS are based on the lowest simulated groundwater elevation after 2040 for the two model simulations in which net seawater intrusion was minimized".</p> <p>COMMENT: Which two model simulations were used? Which reduction or climate scenario was used and are they a part of the 6 model scenarios used to ascertain the sustainable yield?</p>
Amanda	Fagan	Naval Base Ventura County	3 - Sustainable Management Criteria	3.5- Measurable Objectives	3.5.1 Chronic Lowering of Groundwater Levels	<p>Page 3-21.</p> <p>CONTEXT: "Therefore, the measurable objectives were selected based on the median groundwater elevation between 2040 and 2070, simulated for each well, in model simulations that prevented net landward migration of the 2015 saline water impact front after 2040."</p> <p>COMMENT: Median between which outputs? The median of the water levels of the 6 model scenarios?</p>
Amanda	Fagan	Naval Base Ventura County	3 - Sustainable Management Criteria	3.5- Measurable Objectives	3.5.1 Chronic Lowering of Groundwater Levels	<p>CONTEXT: "The median groundwater elevation was rounded down to the nearest 5-foot interval to account for uncertainty in the model simulated future groundwater elevations. In order to account for future sea level rise, the rounded groundwater elevations were increased by 2 feet. The median simulated groundwater elevation (from 2040 to 2070) at each well after rounding and accounting for sea level rise is the measurable objective (Table 3-1)."</p> <p>COMMENT: Why was the groundwater elevation rounded down? Wouldn't choosing a median value already be incorporating some sort of buffering for the uncertainty?</p>
Amanda	Fagan	Naval Base Ventura County	3 - Sustainable Management Criteria	3.5- Measurable Objectives	3.5.1 Chronic Lowering of Groundwater Levels	<p>Page 3-21. Paragraph 4.</p> <p>CONTEXT: "In order to prevent net seawater intrusion in the Subbasin after 2040, observed groundwater levels should be above the measurable objective 50% of the time."</p> <p>COMMENT: 50% of the time in a year or in 5 years or for the full 20-year period? Please clarify.</p>
Amanda	Fagan	Naval Base Ventura County	Figures	3-6a Key Well Hydrographs for Wells Screened in the Oxnard Aquifer	N/A	<p>Pages 3-43 through 3-61. Figure 3-6a through 3-11.</p> <p>CONTEXT: Key Well Hydrographs</p> <p>COMMENT: Water levels modeled in the threshold scenarios show rebounds over a 10 year period of greater than 80 feet at some locations. This suggests A LOT of well pumping being "turned off", or other changes, that may not be realistic.</p>

Commenter			Chapter	Section	Subsection	Comment
Amanda	Fagan	Naval Base Ventura County	4 - Monitoring Networks	4.6-Potential Monitoring Network Improvements	4.6.3 Groundwater Quality Monitoring	The GSP states there is a limited list of analytes being tested for and that it should be “expanded to include a full general minerals suite”. What’s currently being tested for?
Amanda	Fagan	Naval Base Ventura County	Tables	4-2 Network of Stations Monitoring Precipitation in the Vicinity of the Oxnard Subbasin	N/A	<p>Page 4-20. Table 4-2.</p> <p>CONTEXT: Network of Stations Monitoring Precipitation in the Vicinity of the Oxnard Subbasin , (Specifically Station 223A, Point Mugu–USN)</p> <p>COMMENT: This station is being used to provide data. Who maintains this station?</p>
Amanda	Fagan	Naval Base Ventura County	5 - Project Management Actions	5.6-Project No. 5 – Temporary Agricultural Land Fallowing Project	N/A	<p>Page 5-12.</p> <p>CONTEXT: The Temporary Agricultural Land Fallowing Project would use replenishment fees to lease and temporarily fallow agricultural land (FCGMA 2018). This would result in decreased groundwater production on the parcels or ranches that are fallowed, and an overall reduction in groundwater demand in the Subbasin. Parcels or ranches in areas susceptible to seawater intrusion would be targeted with this project (FCGMA 2018).</p> <p>COMMENT: Cultivated agricultural lands provide an important buffer against urban development that may be incompatible with military operations. In addition, evidence from NAS Lemoore suggests that cultivated agricultural lands reduce the prey base, which reduces the risk of raptor strikes on aircraft, mitigating Bird Aircraft Strike Hazards (BASH). As the Fallowing Project proceeds, NBVC respectfully requests coordination with the Navy and project participants to ensure that fallowed lands do not attract prey that results in an elevated BASH risk.</p>
Amanda	Fagan	Naval Base Ventura County	5 - Project Management Actions	5.9- Management Action No. 3 – Water Market Pilot Program	N/A	<p>Page 5-17.</p> <p>CONTEXT: SWIM and Pumping Depression participants can only trade within their management area. This is a geographical limitation of the program. Other than these two distinctions, the geography is ignored by the water market program.</p> <p>COMMENT: When the GMA begins to set the extraction reduction plan, will geographic location be considered when deciding percentage reduced for a given management area?</p>
Amanda	Fagan	Naval Base Ventura County	Appendices	J-GeoTracker Open Sites	N/A	<p>Section 2.1.</p> <p>CONTEXT: Rather than using MODFLOW with the SWI2 package, the UWCD model adjusts general head boundaries at the ocean interface to reflect the hydrostatic head plus the density difference between fresh and sea water. Consequently, this model correctly represents the boundary conditions but cannot be relied upon to forecast seawater intrusion in all of its relevant detail.</p> <p>COMMENT: How can the UWCD model approach be sure, heads-wise? Did the analysis correct all the targets for density concerns? Consider use of MODFLOW-SWI2 or SEAWAT as a more reliable choice for this analysis.</p>

Commenter		Chapter	Section	Subsection	Comment
Amanda	Fagan	Naval Base Ventura County	Appendices	J-GeoTracker Open Sites N/A	<p>Section 2.2.2.</p> <p>CONTEXT: It merely serves to highlight the daunting challenge one faces in trying to parameterize or calibrate groundwater models in a deterministic fashion. It also points out the limitations of local sensitivity analyses implemented in the USGS software PEST (Welter et al., 2015).</p> <p>COMMENT: This statement is misleading in multiple ways. First, PEST is a private software. The USGS code is called UCODE and a modified PEST version called PEST+. In addition to this misunderstanding, using automated calibration techniques in conjunction with local knowledge and human guidance has been shown to be a good approach to calibration. What Welter actually says: "Although there are many different GSA methods, all GSA methods strive to be more robust than traditional, derivative based local sensitivity analysis, which computes the local sensitivities at a single point in parameter space and is not always adequate for analyzing nonlinear problems where the sensitivities can change depending on where they are computed. Some GSA methods provide general information about the variability of the sensitivities and have relatively low computational requirements, whereas others provide detailed information on nonlinear behavior and interactions between parameters at the expense of larger computational requirements."</p>
Amanda	Fagan	Naval Base Ventura County	Appendices	J-GeoTracker Open Sites N/A	<p>Section 2.3.1.</p> <p>CONTEXT: Figures 1 and 2 show that the ARM and Seawater Flux (seawater intrusion) are most sensitive to the values of hydraulic conductivity, which dominate the contributions from other hydrogeologic parameters. The results are presented in terms of the Sobol' indices (Saltelli et al., 2008). The global sensitivity analysis indicates that horizontal hydraulic conductivity values assigned to the Oxnard and Mugu aquifers in the Forebay (Zone 9 and adjacent Zones 10 and 19; see Appendix A for maps of model zones by layer) account for approximately 37% of the variance in the modelwide ARM for groundwater levels and approximately 24% of the variance in calculated seawater flux (these results are presented in the attached Tables 3 and 4 as well).</p> <p>COMMENT: The Figures raise a concern for the Navy subject matter expert that the representation of sea water intrusion could be inaccurate, and that this could be a large problem for the model.</p>
Amanda	Fagan	Naval Base Ventura County	1 - Administrative Information	1.1-Purpose of the Groundwater Sustainability Plan N/A	<p>General Comment re: "submarine canyons."</p> <p>COMMENT: The Mugu and Hueneme Submarine Canyons are located in close proximity to NBVC Point Mugu and NBVC Port Hueneme. The GSP should make clear that the seawater intrusion present in these areas is due to the coincident geographical location of NBVC, not as the result of any current or past activities at the Naval Base. At least one member of the public has raised an issue related to Navy activities, based on an incorrect assumption that the groundwater conditions in the Oxnard Subbasin are a result of Navy activities. The GSP should provide clarity to prevent confusion of geologic features and naval operations.</p>
Amanda	Fagan	Naval Base Ventura County	1 - Administrative Information	1.6-Land Use Elements or Topic Categories of Applicable General Plans 1.6.3 Additional Plan Summaries	<p>Pages 1-40 - 1-41.</p> <p>As noted in the letter from Naval Base Ventura County (NBVC) Commanding Officer dated July 17, 2019, consistent with the California Sustainable Groundwater Management Act, the Groundwater Sustainability Plan (GSP) and allocation ordinance should recognize the Federal Reserve water right and ensure a groundwater allocation that provides for a supply of water to support the current U.S. Navy and Air Force mission and anticipated growth. We acknowledge and appreciate the inclusion of language to that effect on pages 1-40 and 1-41 of the revised GSP. We respectfully request that this recognition continue forward through adoption and implementation of the GSP, to include the allocation ordinance and other management actions.</p>

Commenter		Chapter	Section	Subsection	Comment
Ruthie Redmond	The Nature Conservancy	1 - Administrative Information	1.8- Notification and Communication	1.8.2 Summary of Beneficial Uses and Users	<p>Environmental Beneficial Uses and Users [Checklist Item 1 - Notice & Communication (23 CCR §354.10)]</p> <ul style="list-style-type: none"> Section 1.8.2, pp. 1-45 - 1-46 <p>The GSP identifies the primary environmental users in the Oxnard Subbasin as the identified GDEs, as described in Section 2.3.7, and includes aquatic habitat, in-channel wetlands, riparian forest, and coastal marshes. The GSA has included representation of environmental users on their TAG, in a special meeting on GDEs and in GSP email and meeting notifications. Our suggestion is to explicitly list different types of beneficial uses and users of groundwater under each category. This would better clarify who these beneficial uses and users are in the basin. In regards to environmental beneficial uses and users, we recommend that GDEs identified in the Basin Setting section (i.e., the lower Santa Clara River, McGrath Lake, Ormond Beach wetlands, Mugu Lagoon, Calleguas Creek, and Revolon Slough) be specifically listed, as well as the RWQCB surface water environmental beneficial uses within GDEs listed in Section 2.3.7 (e.g., fish migration and wildlife habitat). The identified GDEs are inclusive of a variety of plant and animal species; some of which are recognized state or federally threatened and endangered or special status species and are designated critical habitat.</p> <p>We also recommend that the GSP specifically engage with the natural resource agencies, NOAA Fisheries, US Fish and Wildlife Service, CA Department of Fish and Wildlife, as stakeholders since they are important parties representing the public trust. In particular, the efforts to address the habitat needs of endangered species such as the endangered Southern California Steelhead in the development of the Multiple Species Habitat Conservation Plan is of particular importance. We suggest that the NOAA Fisheries be consulted to ensure the GSP addresses the ecological needs as represented by these public trust agencies.</p>
Ruthie Redmond	The Nature Conservancy	Tables	1-8 Past and Present Land Uses within the Oxnard Plain, 1990–2015	N/A	<ul style="list-style-type: none"> Table 1-8 <p>Please revise the Land Use Category from “Vacant” to “Open Space”. As noted in Section 1.3.2.3 - Historical, Current, and Projected Land Use and Section 1.6.1 – General Plans, this is a substantial acreage that is valued highly in Ventura County as open space, with ordinances such as the 1998 Save Open Space and Agricultural Resources ordinance. We need to do a better job of delineating open space and native habitat from the “vacant” category, as this devalues the environment and its water need.</p>
Ruthie Redmond	The Nature Conservancy	1 - Administrative Information	1.4-Existing Monitoring and Management Plans	1.4.3 Operational Flexibility Limitations	<p>Description of general plans and other land use plans relevant to GDEs and their relationship to the GSP [Checklist Items 2 to 3 - (23 CCR §354.8)]</p> <p>Operational Flexibility Limitations (p. 1-19 to 1-20)]</p> <p>A Multiple Species Habitat Conservation Plan prepared by UWCD specifies flow conditions at the Freeman Diversion to be constrained by the habitat requirements for the federally endangered Southern California steelhead (<i>Oncorhynchus mykiss</i>) in the Santa Clara River.</p>
Ruthie Redmond	The Nature Conservancy	2 - Basin Setting	2.2-Hydrogeologic Conceptual Model	2.2.3 Principal Aquifers and Aquitards	<p>Hydrogeologic Conceptual Model [Checklist Items 6, and 7 (23 CCR §354.14)]</p> <p>Principal Aquifers and Aquitards (p.2-6 to 2-7), with additional detail in Sections 1.3.2.1, 2.3.6, 2.3.7, 2.4.1.1, 2.4.2.5, Appendix K</p> <p>The Hydrogeologic Conceptual Model adequately describes the shallow groundwater that is interconnected with surface waters and GDEs. Basin-wide cross sections provided in Figures 2-3 and 2-4 include a graphical representation of the manner in which shallow groundwater may interact with ISWs or GDEs that would allow the reader to understand this topic. In the Oxnard Subbasin, the shallow groundwater unit, the semi-perched aquifer, is connected to surface waters (e.g., Santa Clara River, Calleguas Creek, Revolon Slough, McGrath Lake, and the coastal wetlands at Ormond Beach and Mugu Lagoon). The semi-perched aquifer is not considered a principal aquifer due to its limited groundwater production (<50 AFY).</p>

Commenter		Chapter	Section	Subsection	Comment
Ruthie	Redmond	The Nature Conservancy	1 - Administrative Information	1.3- Description of Plan Area 1.3.2 Geography	<p>Interconnected Surface Waters (ISW) [Checklist Items 8, 9, and 10 – (23 CCR §354.16); Identification of ISWs is a required element of Current and Historical Groundwater Conditions (23 CCR §354.16).]</p> <ul style="list-style-type: none"> Sections 1.3.2.1, 2.3.6, 2.3.7, 2.4.1.1, 2.4.2.5, Appendix K <p>The Santa Clara River, Calleguas Creek, Revolon Slough, Mugu Lagoon, Ormond Beach, and McGrath Lake have all been identified as surface water bodies that may have a connection to the semi-perched aquifer in the Oxnard Subbasin. Qualitative statements are made regarding the interconnectedness, including gaining/losing reaches, and timing are provided, along with quantification, based on numerical modeling, of the recharge to groundwater from the Santa Clara River and Calleguas Creek.</p> <p>We disagree with the qualifying statements that the “surface water bodies that may have a connection” and “However, groundwater elevation data for the semi-perched aquifer in the Oxnard Subbasin are extremely limited, with no monitoring sites near enough to surface water bodies to establish the extent of the connection between these surface water bodies and underlying groundwater.” There have been previous efforts to assess the quantity and timing of interconnected surface water and groundwater by other consultants working at or nearby the surface water bodies, such as shallow monitoring data and groundwater modeling at Naval Base Ventura County from site-specific groundwater investigations and surface water and groundwater monitoring data at the Santa Clara River estuary and lower floodplain. These data, including well elevation data dating back to 1990, have been described in TNC’s Technical Memorandum: Assessment of Groundwater Dependent Ecosystems for the Oxnard Subbasin Groundwater Sustainability Plan (Appendix K). TNC’s assessment of these reports indicate that the water elevation data and analyses corroborate the conceptual model that groundwater levels in the semi-perched aquifer relatively constant with a seasonal cyclical behavior, although there has been a downward trend with the recent (2011-16) drought. These reports and data provide estimates of quantity and timing of groundwater - surface water interactions. The GSA should review sed reports and data and revise these statements to be definitive statements of the connections of surface water and groundwater.</p>
Ruthie	Redmond	The Nature Conservancy	2 - Basin Setting	2.3- Groundwater Conditions 2.3.7 Groundwater-Dependent Ecosystems	<p>Identification, Mapping and Description of GDEs [Checklist Items 11 to 20 (23 CCR §354.16)]</p> <ul style="list-style-type: none"> Section 2.3.7 (pp. 2-43 – 2-46) & Appendix K <p>GDEs have been identified and mapped during the GSP development process using an earlier version of the statewide database of GDE indicators (iGDE v0.3.1; TNC, 2017) and TNC’s GDE Guidance document (Rohde et al., 2018). This evaluation is described in Appendix K, with a brief summary in Section 2.3.7. In addition to the mapping of basin GDEs, it also includes both an assessment of the hydrologic and ecological conditions of the GDEs and potential GDEs.</p> <ul style="list-style-type: none"> Executive Summary (p. 1-1); Section 1.1 (p.1-2) <p>While we support the position that “Depletions of interconnected surface water have not occurred historically in the Subbasin, because the Groundwater-Dependent Ecosystems (GDEs) in the Subbasin are supported by shallow groundwater flows that are generally separated and disconnected from the primary groundwater aquifers,” we would like to make this clear that historical conditions represent the time period referenced by SGMA – since the 1980s. As noted in Section 2.2.3, once agriculture grew in the Oxnard subbasin, groundwater levels in the semi-perched aquifer were lowered using the agricultural tile drains (installed in the 1900s) for drainage of irrigated water from the agricultural fields.</p>
Ruthie	Redmond	The Nature Conservancy	2 - Basin Setting	2.4-Water Budget 2.4.1 Sources of Water	<p>Water Budget [Checklist Items 21 and 22 (23 CCR §354.18)]</p> <ul style="list-style-type: none"> Section 2.4 <p>The water budget now includes the semi-perched aquifer and the surface hydrologic components of the semi-perched aquifer, including the groundwater-surface water exchanges with the Santa Clara River and the Calleguas Creek and natural vegetation evapotranspiration (ET). We appreciate the separate inclusion of the semi-perched aquifer water budget.</p>
Ruthie	Redmond	The Nature Conservancy	3 - Sustainable Management Criteria	3.1- Introduction to Sustainable Management Criteria N/A	<p>Sustainability Goal [Checklist Items 23 to 25 (23 CCR §354.24)]</p> <ul style="list-style-type: none"> Section 3.1 Introduction to Sustainable Management Criteria (p. 3-2) <p>Fox Canyon Groundwater Management Agency (FCGMA) Board of Directors (Board) adopted planning goals in 2015 that “Promote water levels that mitigate or minimize undesirable results (including pumping trough depressions, surface water connectivity [emphasis added], and chronic lowering of water levels).”</p> <p>Under current and known future conditions, as described in Section 3.3.6, the sustainability goal does not require inclusion of sustainability criteria for surface water connectivity. We agree this as reasonable position for the GSP at this time, given that the semi-perched aquifer is not a principal aquifer and is not managed for water supply. However, if future projects are envisioned to produce water from the semi-perched aquifer, sustainability criteria will be developed.</p>

Commenter		Chapter	Section	Subsection	Comment	
Ruthie	Redmond	The Nature Conservancy	3 - Sustainable Management Criteria	3.3- Undesirable Results	3.3.6 Depletions of Interconnected Surface Water	<p>Undesirable Results [Checklist Items 30 to 46 (23 CCR §354.26)]</p> <ul style="list-style-type: none"> Section 3.3.6 Depletions of Interconnected Surface Water (p. 3-10 - 3-11) <p>The GSP clearly states: “The undesirable result associated with depletion of interconnected surface water in the Oxnard Subbasin is loss of groundwater-dependent ecosystem (GDE) habitat.” We applaud this clear recognition of GDEs as an important beneficial use that must be protected. We also agree with further statements that 1) undesirable results are not currently occurring, 2) groundwater elevation monitoring will continue to be monitored in the semi-perched aquifer and 3) if future projects involve the use of the semi-perched aquifer, then “depletion of interconnected surface water is possible, and significant and unreasonable impacts may occur.” While we agree that “Reevaluation of the effects on existing and potential GDEs should be conducted in conjunction with the project approval process for any such future projects,” we urge stronger language to specifically state sustainability criteria will be developed at that future time.</p>
Ruthie	Redmond	The Nature Conservancy	3 - Sustainable Management Criteria	3.4-Minimum Thresholds	3.4.6 Depletions of Interconnected Surface Water	<p>Minimum Thresholds [Checklist Items 27 to 29 (23 CCR §354.28)]</p> <ul style="list-style-type: none"> Section 3.4.6 Minimum Thresholds – Depletions of Interconnected Surface Water (p. 3-19 to 3-20) <p>We applaud the language recognizing that future projects may have a potential impact on interconnected surface water and GDEs, and that “if projects that produce groundwater from the semi-perched aquifer are implemented, the need for specific water level minimum thresholds in the semi-perched aquifer should be reevaluated”. This section defines minimum thresholds due to salinity front as it the modeling shows UAS levels support the groundwater elevations in the semi-perched aquifer. This is confusing as it seems like the recharge is predominantly downwards from the semi-perched aquifer to the UAS. It is unclear how the UAS is influencing the salinity front in the semi-perched aquifer.</p>
Ruthie	Redmond	The Nature Conservancy	3 - Sustainable Management Criteria	3.5- Measurable Objectives	3.5.6 Depletions of Interconnected Surface Water	<p>Measurable Objectives -Checklist Item 26 – (23 CCR §354.30)</p> <ul style="list-style-type: none"> Section 3.5.6 Measurable Objectives – Depletions of Interconnected Surface Water (p. 3-26 to 3-27) <p>A measurable objective for interconnected surface water in the semi-perched aquifer is set to address seawater intrusion. We recommend adding a statement, as is done in Section 3.4.6, that “if projects that produce groundwater from the semi-perched aquifer are implemented, specific water level measurable objectives in the semi-perched aquifer should be developed”.</p>
Ruthie	Redmond	The Nature Conservancy	4 - Monitoring Networks	4.3- Monitoring Network Relationship to Sustainability Indicators	4.3.6 Depletions of Interconnected Surface Water	<p>Monitoring Network [Checklist Items 47, 48 and 49 (23 CCR §354.34)]</p> <ul style="list-style-type: none"> Section 4.3.6 Depletions of Interconnected Surface Water (p.4-10) <p>We recommend inclusion of remote sensing vegetative indices as a low cost approach to monitor baseline conditions of GDEs. The Nature Conservancy’s free online tool, GDE Pulse, allows GSAs a way to assess changes in GDE health using remote sensing data sets; specifically, the Normalized Difference Vegetation Index (NDVI), which is a satellite-derived index that represents the greenness of vegetation and Normalized Difference Moisture Index (NDMI), which is a satellite-derived index that represents water content in vegetation.</p>

Commenter		Chapter	Section	Subsection	Comment										
Ruthie	Redmond	The Nature Conservancy	4 - Monitoring Networks	4.6-Potential Monitoring Network Improvements	<p>4.6.5 Shallow Groundwater Monitoring near Surface Water Bodies and GDEs</p> <p>Monitoring Network [Checklist Items 47, 48 and 49 (23 CCR §354.34)]</p> <ul style="list-style-type: none"> Section 4.6.5 Shallow Groundwater Monitoring near Surface Water Bodies and GDEs (p.4-15) <p>The GSP notes the lack of shallow groundwater monitoring wells in the semi-perched aquifer that can be used to monitor interconnected surface water bodies/GDEs along the Lower Santa Clara River, McGrath Lake, Ormond Beach and Mugu Lagoon, and potential GDEs along the Revolon Slough and Lower Calleguas Creek in the Subbasin. We support the inclusion of monitoring wells with the potential GDEs to better assess the potential connectivity. A number of wells are in the vicinity of the GDEs and are monitored by other agencies for specific remediation cases or regional studies. These should be included in the GSP. It is to the benefit of the GSA to make use of these existing monitoring wells as they provide long term historical records, are already monitored by other agencies and are available at no cost to the GSA. The data have been made available for the GSP and it is recommended that monitoring agreements be put in place to receive ongoing data on these wells and ensure the long-term monitoring continues. In particular, we suggest the following wells to serve as representative monitoring wells for each GDE in order to monitor impacts caused by depletions of interconnected surface water (Figures 6-9, Appendix K):</p> <table border="1"> <tr> <td>GDE</td> <td>Well</td> </tr> <tr> <td>Lower Santa Clara River</td> <td>2N22W30A03S</td> </tr> <tr> <td>McGrath Lake</td> <td>GW-3</td> </tr> <tr> <td>Ormond Wetlands</td> <td>01N22W27G04S</td> </tr> <tr> <td>Mugu Lagoon</td> <td>MW6-6A</td> </tr> </table>	GDE	Well	Lower Santa Clara River	2N22W30A03S	McGrath Lake	GW-3	Ormond Wetlands	01N22W27G04S	Mugu Lagoon	MW6-6A
GDE	Well														
Lower Santa Clara River	2N22W30A03S														
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Ruthie	Redmond	The Nature Conservancy	4 - Monitoring Networks	4.6-Potential Monitoring Network Improvements	<p>4.6.6 Surface Water: Flows in Agricultural Drains in the Oxnard Plain</p> <p>Monitoring Network [Checklist Items 47, 48 and 49 (23 CCR §354.34)]</p> <ul style="list-style-type: none"> Section 4.6.6 Surface Water: Flows in Agricultural Drains in the Oxnard Plain (p.4-15 – 4-16) <p>We would also recommend that we survey the water surface elevation in the drains, as they should be easy to measure, provide calibration head values for the numerical model and good indication of the semi-perched aquifer elevations.</p>										
Ruthie	Redmond	The Nature Conservancy	5 - Project Management Actions	5.9- Management Action No. 3 – Water Market Pilot Program	<p>Projects and Management Actions to Achieve Sustainability Goal [Checklist Items 50 and 51 (23 CCR §354.44)]</p> <ul style="list-style-type: none"> Section 5.9 Management Action No. 3 – Water Market Pilot Program (p. 5-17 – 5-18) <p>The GSP indicates that significant reductions in groundwater extractions will be needed to avoid undesirable results. These reductions may have serious impacts on existing extractors. We support development and implementation of a well-designed water market that will incentivize conservation and provide flexibility for pumpers in meeting the objectives of the GSP. The water market must have rules that prevent negative impacts to other beneficial users such as the environment and Disadvantaged Communities.</p>										
Thien	NG	City of Oxnard / Assistant Public Works Director	2 - Basin Setting	2.4-Water Budget	<p>2.4.5 Projected Future Water Budget and Sustainable Yield</p> <p>Concern regarding quote: No projects currently under development were identified in the Oxnard Subbasin, but two projects under development in the PVB were incorporated into the future baseline simulation because these projects affect inflows to the Oxnard Subbasin. The two projects in PVB are the City of Camarillo’s North Pleasant Valley Desalter (desalination) Project and Conejo Creek Diversion deliveries to Pleasant Valley County Water District. (2-64)</p> <p>The Conejo Creek Diversion project is no longer under construction, but rather is in operation. Please revise and update narrative in the GSP.</p>										

Commenter		Chapter	Section	Subsection	Comment
Thien	Ng City of Oxnard / Assistant Public Works Director	2 - Basin Setting	2.4-Water Budget	2.4.5 Projected Future Water Budget and Sustainable Yield	<p>Concern regarding quote: "It should be noted that these wells were selected for modeling purposes only and use of these wells in the model simulations was not intended to represent any planned pumping restrictions or limitations on these wells." (2-66)</p> <p>Update narrative to clarify that the projects (i.e., GREAT Program projects) were included for modeling purposes only, and that the inclusion of the City's projects in either narrative or modeling in the GSP does not constitute a binding commitment on the part of the City of Oxnard.</p>
Thien	Ng City of Oxnard / Assistant Public Works Director	2 - Basin Setting	2.4-Water Budget	2.4.5 Projected Future Water Budget and Sustainable Yield	<p>Concern regarding quote: "None of the model scenarios described in Section 2.4.5 successfully eliminated seawater intrusion in the LAS during the sustaining period, while the majority of the model scenarios resulted in net freshwater loss from the UAS to the Pacific Ocean. Therefore, none of the direct model scenarios was used to determine the sustainable yield of the Oxnard Subbasin. Instead, the relationship between seawater flux and groundwater production from each of the model scenarios was used to predict the quantity of groundwater production that would result in no net seawater intrusion over the sustaining period in either the UAS or the LAS." (2-74)</p> <p>This paragraph indicates that a no-loss scenario relative to freshwater impacts was not achievable in the direct modeling of the Subbasin. This calls into question the viability of the model scenarios, as well as the approach chosen to predict no net seawater intrusion groundwater production scenarios.</p>
Thien	Ng City of Oxnard / Assistant Public Works Director	3 - Sustainable Management Criteria	3.2-Sustainability Goal	N/A	<p>Concern regarding the quote: "In order to achieve the sustainability goal, groundwater production will need to be reduced relative to historical groundwater production rates. At the same time, groundwater production inland from the coast may be allowed to increase as infrastructure is developed to convey inland production to agricultural users on the coast." (3-2)</p> <p>The wording of this section is vague. Please revise to clarify intent as well as the mechanism by which differential increases in production and infrastructure expansion may be contemplated.</p>
Thien	Ng City of Oxnard / Assistant Public Works Director	3 - Sustainable Management Criteria	3.2-Sustainability Goal	N/A	<p>Concern regarding the quote: "Proposed reductions in groundwater production must take into account both the potential economic disruption to the agricultural industry in the Subbasin" (3-2)</p> <p>Proposed reductions in groundwater production will affect a vast variety of stakeholders not limited to the agricultural industry. Reductions could affect ratepayers of the City of Oxnard, M&I, and more.</p>
Thien	Ng City of Oxnard / Assistant Public Works	3 - Sustainable Management Criteria	3.2-Sustainability Goal	N/A	<p>Concern regarding the quote: "During the first 5 years following GSP adoption, it is anticipated that the combined groundwater production from both the UAS and the LAS will begin to be reduced toward the estimated sustainable yield" (3-2)</p> <p>It is unclear how the current observed groundwater production rate will be reduced toward sustainable yield. Revise section to clarify the regulatory mechanism that will compel the reduction in production to currently contemplated sustainable yield levels in the first 5 years following GSP adoption.</p>
Thien	Ng City of Oxnard / Assistant Public Works Director	3 - Sustainable Management Criteria	3.3-Undesirable Results	3.3.1 Chronic Lowering of Groundwater Levels	<p>Concern regarding the quote: "One factor that contributed to the recovery of water levels following periods of drought was the amount of surface water that was diverted from the Santa Clara River and infiltrated through spreading basins to recharge the aquifers." (3-4)</p> <p>Revise section to address the mandatory reductions in the most recent drought, where M&I users were limited in pumping by Emergency Ordinance E on top of prior pumping restrictions. These reductions were likely a key factor in the recovery of aquifer elevations, as opposed to ephemeral diversions associated with the Santa Clara River.</p>
Thien	Ng City of Oxnard / Assistant Public Works Director	3 - Sustainable Management Criteria	3.3-Undesirable Results	3.3.1 Chronic Lowering of Groundwater Levels	<p>Concern regarding the quote: "Based on the sustainability goals for the Oxnard Subbasin, the criterion used to define undesirable results for chronic lowering of groundwater levels is landward migration of the 2015 saline water impact front during the sustaining period from 2040 through 2069." (3-4)</p> <p>Revise section and narrative discussion of undesirable results related to saline impact and associated sustainability criteria. The discussion acknowledges both the effects of the 2015 saline water impact front, as well as elevated chloride concentrations associated with naturally occurring source unrelated to seawater intrusion. It is unclear how the differentiation between elevated chloride concentrations from the different sources will be accomplished and meaningful monitoring of sustainability criteria will occur.</p>

Commenter		Chapter	Section	Subsection	Comment	
Thien	Ng	City of Oxnard / Assistant Public Works Director	3 - Sustainable Management Criteria	3.1- Introduction to Sustainable Management Criteria	N/A	<p>Concern regarding the quote: "One factor that contributed to the recovery of water levels following periods of drought was the amount of surface water that was diverted from the Santa Clara River and infiltrated through spreading basins to recharge the aquifers. Surface-water flows are available during wetter-than-average precipitation periods. These surface-water diversions and spreading are controlled by the United Water Conservation District (UWCD), which anticipates maintaining the historical volume of water diverted from the Santa Clara River over the next 50 years (UWCD 2018)." (3-4)</p> <p>In the presence of heightened regulatory pressure associated with diversions due to lower Santa Clara River GDE's and other environmental factors noted in the GSP, it is unreasonable to conclude that the historical volume of diversions may be assumed to continue. Additionally, diversions associated with high flows in the Santa Clara River are related to hydrologic events that are inherently ephemeral in nature. Thus the contribution of diversions to aquifer recharge should be considered incidental in nature.</p>
Thien	Ng	City of Oxnard / Assistant Public Works Director	3 - Sustainable Management Criteria	3.3- Undesirable Results	3.3.3 Seawater Intrusion	<p>Concern regarding the quote: "Significant and unreasonable seawater intrusion is an undesirable result that is present or likely to occur in the Oxnard Subbasin. Seawater intrusion is the primary sustainability indicator in the Oxnard Subbasin." (Page 3-6)</p> <p>Seawater intrusion and related elevated chloride concentrations are noted as the primary sustainability indicator in the Oxnard Subbasin. Other sources of elevated chloride concentrations are discussed; however, further study, mapping and narrative of specific sources of connate water related to fine-grained lagoonal deposits should be conducted. This information will inform the process of evaluation of future chloride measurements in the saline water impact area.</p>
Thien	Ng	City of Oxnard / Assistant Public Works Director	3 - Sustainable Management Criteria	3.3- Undesirable Results	3.3.3 Seawater Intrusion	<p>Concern regarding the quote: "The connate water is released as groundwater head in the aquifer declines and fine-grained deposits compress." (Page 3-7)</p> <p>Clarify if "compress" should be revised to "expand."</p>
Thien	Ng	City of Oxnard / Assistant Public Works Director	3 - Sustainable Management Criteria	3.3- Undesirable Results	3.3.4 Degraded Water Quality	<p>Concern regarding Section 3.3.4.2 Nitrate.</p> <p>Nitrate concentrations are noted as resulting in significant and unreasonable impacts to beneficial uses; however, ensuing discussion is weak in relation to actionable solutions. Merely stipulating historical contributions of nitrates as the source of elevated concentrations above WQOs and BMOs in the Forebay is not a sufficient acknowledgment of the observed issue. Further discussion of current practice and recommendations regarding restrictions on the continued nitrate loading related to agricultural operations should be included to address practices that perpetuate this undesirable result.</p>
Thien	Ng	City of Oxnard / Assistant Public Works Director	3 - Sustainable Management Criteria	3.3- Undesirable Results	3.3.4 Degraded Water Quality	<p>Concern regarding the quote: "Rather, nitrate concentrations above WQOs and BMOs in the Forebay are likely a legacy of historical septic discharges and historical agricultural fertilizer application practices." (Page 3-9)</p> <p>The contribution of septic systems has been on the decline for some time as septic to sewer conversions have become more common, and often mandated, by the RWQCB and local agencies. The observed nitrate loading continues with on-going agricultural operations, and while practices related to fertilizer application and constituents may be changing, an acknowledgment of their role in the observed issues should be included in narrative and mitigation measures should be stipulated.</p>
Thien	Ng	City of Oxnard / Assistant Public Works Director	3 - Sustainable Management Criteria	3.3- Undesirable Results	3.3.4 Degraded Water Quality	<p>Concern regarding the quote: "UWCD currently anticipates maintaining and potentially increasing surface-water recharge from the Santa Clara River in the future." (Page 3-9)</p> <p>Surface water diversions and related potential for recharge are likely to be reduced in the future due to environmental and regulatory restrictions identified elsewhere in the document. As noted previously, the contribution of recharge water-related to diversions from the Santa Clara River are ephemeral in nature and limited in their ability to meaningfully dilute nitrate concentrations in the Forebay. Related sections of the narrative should be revised accordingly.</p>

Commenter		Chapter	Section	Subsection	Comment
Thien	Ng City of Oxnard / Assistant Public Works Director	3 - Sustainable Management Criteria	3.3- Undesirable Results	3.3.7 Defining Subbasin-Wide Undesirable Results	<p>Concern regarding the quote: "Undesirable results are defined in three ways for the UAS in the Oxnard Subbasin. The first is based on the total number of wells, independent of management area or aquifer. Under this definition, the UAS will be determined to be experiencing undesirable results if, in any single monitoring event, water levels in six of the 15 key wells are below their respective minimum thresholds" (Page 3-12)</p> <p>The number of hydrographs for UAS wells noted in Figures 3-7a and 3-7b reflect only 14 wells.</p>
Thien	Ng City of Oxnard / Assistant Public Works Director	3 - Sustainable Management Criteria	3.4-Minimum Thresholds	3.4.1 Chronic Lowering of Groundwater Levels	<p>Concern regarding the quote: "In general, the simulated groundwater elevations in the model scenario with projects were close to those in the scenario without projects, with any observed difference between the two limited to less than approximately 10 feet (Figures 3-6 through 3-11, Key Well Hydrographs)." (Page 3-14)</p> <p>This statement does not recognize the difference between the scenarios as significant; however, 5 to 10 feet higher water level elevations along the coast is potentially significant. In addition, the statement does not recognize that the impacts to groundwater users without the projects is likely greater.</p>
Thien	Ng City of Oxnard / Assistant Public Works Director	3 - Sustainable Management Criteria	3.4-Minimum Thresholds	3.4.1 Chronic Lowering of Groundwater Levels	<p>Concern regarding the quote: "The lowest simulated value was then rounded down to the nearest 5-foot interval to further account for uncertainty in the future simulated groundwater elevations. The rounded groundwater elevation was then raised by 2 feet to account for predicted sea level rise by 2070." (Page 3-14)</p> <p>Clarify the rationale for rounding down 5 feet. This rounding is significant in comparison to the projected minimum thresholds for water levels. This appears contrary to SGMA's "reasonable margin of safety was established for each measureable objective." This is more than a 50% difference in minimum threshold change for some of the selected key wells. For example, Well 01N23W01C05S proposes a minimum thresholds of 7 ft msl from the 1.2 ft msl measured data in Table 3-1. The rounding of 2-5 feet appears to reflect a difference; if this is rounded by 5 feet, the difference is 80%.</p>
Thien	Ng City of Oxnard / Assistant Public Works Director	3 - Sustainable Management Criteria	3.4-Minimum Thresholds	3.4.3 Seawater Intrusion	<p>Concern regarding the quote: "Such a reduction may impact the value of agricultural land, drive changes in crop types, result in temporary fallowing of agricultural acreage, and cause economic disruption to the regional economy." (Page 3-17)</p> <p>Such a reduction would impact not only on the value of Agricultural land but all land. Also, further impacts of reduction would be impeding business and development and raising water rates.</p>
Thien	Ng City of Oxnard / Assistant Public Works Director	3 - Sustainable Management Criteria	3.4-Minimum Thresholds	3.4.4 Degraded Water Quality	<p>Concern regarding the quote: "For these concentrations, the recharge source water should be of the highest quality possible to maintain or improve future groundwater quality (Section 3.3.4, Degraded Water Quality)." (Page 3-17)</p> <p>The term "highest quality possible" is undefined in the context of existing RWQCB and DDW requirements for water quality. As the sources of degraded water quality have previously been discussed, the source of such "highest quality" should be identified and discussed.</p>
Thien	Ng City of Oxnard / Assistant Public Works Director	4 - Monitoring Networks	4.1- Monitoring Network Objectives	N/A	<p>Concern regarding the entire Section 4.1 Monitoring Network Objectives</p> <p>Chapter 4 of the GSP addresses the proposed monitoring of progress towards sustainability goals, as well as measuring against minimum thresholds established. Such monitoring of groundwater elevations is a critical consideration in what will ultimately be a regulatory function of the monitoring network. The section narrative, together with the tabulated well network, indicate the presence of a significant number of agricultural production wells. Groundwater monitoring standards are written to address measurements and sampling related to dedicated monitoring wells, and these standards illustrate the limitations and potential error associated with utilizing data from production wells. While the inclusion of production wells in the State's CASGEM program was a result of the required well network established by Senate Bill 6 in 2009, it has been understood that the data would be used for informational purposes to monitor trends in groundwater levels basin-wide. The transition from the use of the monitoring network from informational to regulatory purposes requires the rigorous evaluation of the existing network, together with an understanding of the incompatibility of production wells with a regulatory monitoring system. The last paragraph of Section 4.1 notes the need for additional monitoring wells to better represent conditions in the aquifers than production wells. The City recommends that all production wells be replaced by dedicated monitoring wells to both provide adequate spacial coverage, as well as evaluating existing and proposed dedicated monitoring wells for the potential effects of adjacent agricultural production wells.</p>

Commenter		Chapter	Section	Subsection	Comment	
Thien	Ng	City of Oxnard / Assistant Public Works Director	4 - Monitoring Networks	4.2- Description of Existing Monitoring Network	4.2.2 Surface Conditions Monitoring	<p>Concern regarding the quote: "These diversions are used to deliver surface water to agricultural users in lieu of groundwater production and are used for recharge, via UWCD's spreading grounds, to the groundwater aquifers in the Subbasin." (Page 4-2)</p> <p>Diversions do not represent a sustainable source of alternative water and should not use 'in-lieu' terminology.</p>
Thien	Ng	City of Oxnard / Assistant Public Works Director	4 - Monitoring Networks	4.2- Description of Existing Monitoring Network	4.2.1 Groundwater Monitoring	<p>Concern regarding the entire Section 4.2.1 Groundwater Monitoring</p> <p>The last paragraph on page 4-2 notes that the existing monitoring network is sufficient and that evaluation of the current network confirms this. Based on established DWR standards, this is an incorrect statement, as the network utilizes data derived from production wells, which are inherently prone to error. Please revise section narrative to clarify the need for removal of agricultural production wells from the network, and the replacement of these with properly designed and sited monitoring wells.</p>
Thien	Ng	City of Oxnard / Assistant Public Works Director	4 - Monitoring Networks	4.3- Monitoring Network Relationship to Sustainability Indicators	4.3.1 Chronic Lowering of Groundwater Levels	<p>Concern regarding the quote: "To monitor conditions related to chronic lowering of groundwater levels, the groundwater monitoring network must be structured to accomplish the following:</p> <ul style="list-style-type: none"> • Track short-term, seasonal, and long-term trends in water elevation. • Demonstrate groundwater elevations in mid-March and mid-October for each primary aquifer or aquifer system. • Record groundwater elevations in key wells in which minimum thresholds and measurable objectives have been identified to track progress toward the sustainability goals for the Subbasin. " (Page 4-5) <p>The reliance on groundwater elevations to track all progress toward sustainability in the Subbasin should require all key wells to be instrumented with pressure transducers for measurement accuracy and a higher temporal resolution in the data.</p>
Thien	Ng	City of Oxnard / Assistant Public Works Director	4 - Monitoring Networks	4.3- Monitoring Network Relationship to Sustainability Indicators	4.3.1 Chronic Lowering of Groundwater Levels	<p>Concern regarding the quote: "The Subbasin monitoring well density for groundwater elevations varies by aquifer (Tables 4-3 and 4-4). Of the primary aquifers in the Subbasin identified in Chapter 2, Basin Setting, the Grimes Canyon Aquifer has the lowest density of active wells in which groundwater elevations can be measured.." (Page 4-5)</p> <p>Revise narrative to include discussion of production wells and monitoring wells in the network, and clarify referenced standards.</p>
Thien	Ng	City of Oxnard / Assistant Public Works Director	4 - Monitoring Networks	4.3- Monitoring Network Relationship to Sustainability Indicators	4.3.1 Chronic Lowering of Groundwater Levels	<p>Concern regarding the quote: "There is no definitive rule for the density of groundwater monitoring points needed in a basin; however, for comparison, the monitoring well density recommended by CASGEM Groundwater Elevation Monitoring Guidelines ranges from 1 to 10 wells per 100 square miles (DWR 2010)." (Page 4-5)</p> <p>The reference document (DWR Groundwater Elevation Monitoring Guidelines- December 2010) utilizes USGS methodology that is written for monitoring, not production wells (page 8). Additionally, guidelines require that measurements from production wells should not be made for 24 hours after cessation of pumping due to well recovery considerations (page 14). This is a significant area of concern for how data will be collected and utilized.</p>
Thien	Ng	City of Oxnard / Assistant Public Works Director	4 - Monitoring Networks	4.3- Monitoring Network Relationship to Sustainability Indicators	4.3.2 Reduction of Groundwater Storage	<p>Concern regarding the quote: "The current network of wells is capable of documenting changes to both sustainability indicators." (Page 4-7)</p> <p>This does not correspond with the response to groundwater elevations.</p>

Commenter		Chapter	Section	Subsection	Comment	
Thien	Ng	City of Oxnard / Assistant Public Works Director	4 - Monitoring Networks	4.3- Monitoring Network Relationship to Sustainability Indicators	4.3.3 Seawater Intrusion	<p>Concern regarding the quote: "Groundwater samples will continue to be collected and analyzed for total dissolved solids (TDS) and chloride in order to assess trends in groundwater quality related to seawater intrusion. The network of existing wells is capable of providing an adequate assessment of groundwater quality trends for these constituents." (Page 4-8)</p> <p>An additional concern about nitrates should be included in the water quality constituents.</p>
Thien	Ng	City of Oxnard / Assistant Public Works Director	4 - Monitoring Networks	4.4- Monitoring Network Implementation	4.4.1 Groundwater Elevation Monitoring Schedule	<p>Concern regarding the quote: "Short-term trends in groundwater elevation are currently, and will continue to be, monitored using transducers that are operated and maintained by UWCD." (Page 4-11)</p> <p>According to the GSP 'The United Water Conservation District (UWCD) collects groundwater elevation data from more than 100 monitoring and agricultural wells in the Subbasin ... Pressure transducers have been installed in 65 of these wells.' . Clarify that this monitoring is not all inclusive but rather limited to a limited number of monitoring wells.</p>
Thien	Ng	City of Oxnard / Assistant Public Works Director	4 - Monitoring Networks	4.5-Protocols for Data Collection and Monitoring	N/A	<p>Concern regarding the entire Section 4.5 Protocols for Data Collection and Monitoring.</p> <p>The additional narrative should be provided to include how that collected data is utilized to support sustainability indicators, including determination/location of seawater intrusion contours, determination of storage volume, etc.</p>
Thien	Ng	City of Oxnard / Assistant Public Works Director	4 - Monitoring Networks	4.5-Protocols for Data Collection and Monitoring	N/A	<p>Concern regarding the quote: "If the pump housing is warm, the water level that is entered into the database is qualified with a Questionable Measurement Code, indicating recent pumping." (Page 4-12)</p> <p>According to Monitoring Protocols Best Management Practices (BMPs) produced by DWR, measurements from production wells should not be made for 24 hours after cessation of pumping due to well recovery considerations. The condition of the pump housing only indicates recent pump activity and does serve as an indicator of whether the pump has operated in the past 24 hours.</p>
Thien	Ng	City of Oxnard / Assistant Public Works Director	5 - Project Management Actions	5.7- Management Action No. 1 – Reduction in Groundwater Production	N/A	<p>Concern regarding the entire Section 5.7 Management Action No. 1 – Reduction in Groundwater Production</p> <p>Projects that will be implemented to increase or maintain groundwater production at the presently reduced historical levels during the process of achieving sustainable yield have not been identified. The GSP has effectively framed the range of the sustainable groundwater resource under existing conditions but lacks a road map as to how the FCGMA plans to achieve sustainability without significantly impacting all groundwater users.</p> <p>If the groundwater allocation system to achieve Management Action No. 1 were included in the GSP, the stakeholders could understand the potential magnitude and timing of water supply projects that will need to be developed to lessen the impacts on groundwater users.</p>
Thien	Ng	City of Oxnard / Assistant Public Works Director	5 - Project Management Actions	5.9- Management Action No. 3 – Water Market Pilot Program	N/A	<p>Concern regarding the quote: "Analysis of the Water Market Pilot Program will be conducted and its suitability for incorporation as a management action for the Subbasin will be determined after the pilot program is completed in July 2019." (Page 5-18)</p> <p>A Water Market for municipal and industrial groundwater users is necessary for coordination and conjunctive use of water resources amongst this category of groundwater pumpers.</p>

Commenter		Chapter	Section	Subsection	Comment	
Thien	Ng	City of Oxnard / Assistant Public Works Director	Executive Summary	ES.5-Projects and Management Actions	N/A	<p>Concern regarding provided quote;"A comprehensive water allocation system for groundwater users in the Subbasin is under development by the FCGMA . . ." (Page ES-9)</p> <p>There has been considerable discussion between groundwater users and FCGMA staff about the system being developed. Until the allocation system is finalized, the equitable application or the impacts of Management Action No. 1 cannot be thoroughly assessed and commented on by groundwater pumpers in the FCGMA.</p>
Thien	Ng	City of Oxnard / Assistant Public Works Director	1 - Administrative Information	1.1-Purpose of the Groundwater Sustainability Plan	N/A	<p>Concern regarding provided quote;"Depletions of interconnected surface water have not occurred historically in the Subbasin, because the Groundwater-Dependent Ecosystems (GDEs) in the Subbasin are supported by shallow groundwater flows that are generally separated and disconnected from the primary groundwater aquifers." (Page 1-2)</p> <p>This statement contradicts the following statement made in Section 3.4.6 (See Page 3-19): "The selected groundwater elevations are anticipated to protect against depletion of interconnected surface water, because historical groundwater elevations in the semi-perched aquifer have maintained the documented and potential GDEs in the Subbasin . . ."</p>
Thien	Ng	City of Oxnard / Assistant Public Works Director	1 - Administrative Information	1.2-Agency Information	1.2.6 Groundwater Sustainability Plan Implementation and Cost Estimate	<p>Concern regarding the provided quote; "The primary costs associated with implementing the GSP..." (Page 1-7)</p> <p>The GSP must include quantitative estimates of the cost of implementation, including costs of implementation that may be imposed on parties other than FCGMA. The qualitative discussion does not fulfill the requirements of Cal. Code Regs., tit. 23, § 354.6, subd. (e).</p>
Thien	Ng	City of Oxnard / Assistant Public Works Director	1 - Administrative Information	1.2-Agency Information	1.2.6 Groundwater Sustainability Plan Implementation and Cost Estimate	<p>Concern regarding Section 1.2.6.2 Data Gap Analysis and Priorities (Page 1-8)</p> <p>The recommendation to address the potential for anomalous data obtained from agricultural production wells with pressure transducers is flawed. The use of pressure transducers may provide a higher volume of water level measurement, but this volume of data does not necessarily address well recovery and the measurement of static water levels. According to DWR Groundwater Elevation Monitoring Guidelines (page 14), the measurement of water level must not be conducted within 24 hours after cessation of pumping. Monitoring must be tied to well pump operation for meaningful measurements.</p>
Thien	Ng	City of Oxnard / Assistant Public Works Director	1 - Administrative Information	1.2-Agency Information	1.2.6 Groundwater Sustainability Plan Implementation and Cost Estimate	<p>Concern regarding the provided quote; "In addition, it is anticipated that basin optimization studies will be undertaken in the initial 5-year period after the GSP is implemented adopted..." (Page 1-9)</p> <p>The statement is not clear as to intent. Revise narrative to clarify whether "implemented" or "adopted" is the intended enabling event.</p>
Thien	Ng	City of Oxnard / Assistant Public Works Director	1 - Administrative Information	1.6-Land Use Elements or Topic Categories of Applicable General Plans	1.6.2 Urban Water Management Plans	<p>Concern regarding the provided quote; "Groundwater supply assumptions made by urban water suppliers in their 2015 UWMPs will be superseded by the groundwater allocation reduction management actions discussed in Chapter 5 of this GSP." (Page 1-31)</p> <p>SGMA does not authorize FCGMA to supersede local land use powers. Wat. Code, § 10726.8, subd. (f) ["Nothing in this chapter or a groundwater sustainability plan shall be interpreted as superseding the land use authority of cities and counties, including the city or county general plan, within the overlying basin."]</p>

Commenter		Chapter	Section	Subsection	Comment	
Thien	Ng	City of Oxnard / Assistant Public Works Director	1 - Administrative Information	1.5-Existing Conjunctive-Use Programs	N/A	Concern regarding Section 1.5 Existing Conjunctive-Use Programs: City of Oxnard Advanced Water Purification Facility (Page 1-24) The GMA conjunctive use program does not restrict the use of allocation with the exception of a City of Oxnard program. GMA resolution 2013-02 limits the use of Forebay pumping based on Forebay available storage volume. This is an unfair practice, which the City of Oxnard finds objectionable.
Thien	Ng	City of Oxnard / Assistant Public Works Director	1 - Administrative Information	1.6-Land Use Elements or Topic Categories of Applicable General Plans	1.6.1 General Plans	Concern regarding the provided quote; "There are no agricultural water management plans applicable to the Oxnard Subbasin because none of the water purveyors serve more than 25,000 irrigated acres within the Subbasin (excluding recycled water deliveries)." (Page 1-25) Please provide clarification as to the intent of this sentence.
Thien	Ng	City of Oxnard / Assistant Public Works Director	1 - Administrative Information	1.8-Notification and Communication	1.8.2 Summary of Beneficial Uses and Users	Concern regarding Section 1.8.2 Summary of Beneficial Uses and Users – Surface Water Users (Page 1-45) The section on beneficial uses and users should include a subsection to address water import and water importers serving the Oxnard Subbasin as the import of water reduces the amount of groundwater that must be pumped from the Subbasin.
Thien	Ng	City of Oxnard / Assistant Public Works Director	Tables	1-9 Past, Current, and Projected Population for Ventura County, the Cities of Oxnard and Port Hueneme, and the Oxnard Plain	N/A	No data was provided for Oxnard in 2015. Please provide corresponding data in the table.
Thien	Ng	City of Oxnard / Assistant Public Works Director	Figures	1-2 Administrative Boundaries for the Oxnard Subbasin	N/A	Northern boundary between Oxnard Subbasin and Mound Subbasin should reflect most recent boundary changes accepted by DWR in February 2019.
Thien	Ng	City of Oxnard / Assistant Public Works Director	2 - Basin Setting	2.1-Introduction to Basin Setting	N/A	Concern regarding the provided quote; "In the UAS, the average annual change in freshwater storage is a loss of approximately 6,600 AFY, which is more than two times greater than the total average annual change in storage for the UAS (2,800 AFY), including seawater intrusion (Figure 2-24, Oxnard Subbasin Annual Change in Storage Without Coastal Flux)." (Page 2-26) It appears that Figure 2-24 should be titled "With Coastal Flux" not without coastal flux because it includes seawater intrusion.

Commenter		Chapter	Section	Subsection	Comment
Thien	Ng	City of Oxnard / Assistant Public Works Director	2-24 Oxnard Subbasin Annual Change in Storage Without Coastal Flux	N/A	It appears that Figure 2-24 should be titled "With Coastal Flux" not without coastal flux because it includes seawater intrusion as called out in Section 2.3.2 Estimated Change in Storage. "In the UAS, the average annual change in freshwater storage is a loss of approximately 6,600 AFY, which is more than two times greater than the total average annual change in storage for the UAS (2,800 AFY), including seawater intrusion (Figure 2-24, Oxnard Subbasin Annual Change in Storage Without Coastal Flux)." (Page 2-26)
Thien	Ng	City of Oxnard / Assistant Public Works Director	2 - Basin Setting	2.3- Groundwater Conditions 2.3.3 Seawater Intrusion	Concern regarding the provided quote; "Although this section focuses on areas that are known to be susceptible to seawater intrusion, the precise extent of current seawater intrusion impacts is difficult to separate from the areas that are impacted by release of saline water from connate brines." (Page 2-29) The Oxnard Subbasin GSP states that the FCGMA cannot differentiate between seawater intrusion and sedimentary rock leaching. If the saline problem stems from the latter, under-pumping will make it worse. Effort should be put into identifying the difference.
Thien	Ng	City of Oxnard / Assistant Public Works Director	2 - Basin Setting	2.3- Groundwater Conditions 2.3.2 Estimated Change in Storage	Concern regarding the provided quote; "Annual change in storage is not strongly correlated to groundwater pumping in the Oxnard Plain ($R2 < 0.5$). In contrast, artificial groundwater recharge at the UWCD spreading grounds is correlated with change in storage ($R2 > 0.8$; see Figures 2-22 and 2-23)." (Page 2-26) The Oxnard Subbasin GSP reflects the reduction in groundwater pumping as the main objective/goal for the Subbasin. If there is not a strong correlation between groundwater pumping and change in storage why is there not more focus set on recharging the Subbasin in the GSP?
Thien	Ng	City of Oxnard / Assistant Public Works Director	2 - Basin Setting	2.3- Groundwater Conditions 2.3.3 Seawater Intrusion	Additional paragraph should be included into section; In 1953, a bond issue was presented to the electors within UWCD to provide funds for the construction of one dam and the Lower River distribution system, including a pipeline to the Oxnard-Port Hueneme area. Simultaneous with the bond issue, UWCD entered into contracts with water users on the Oxnard Plain area for the construction of this pipeline. The City of Oxnard was the predominant user, and it contracted with UWCD in order to move the City's pumping from the seawater intrusion front to the Montalvo Forebay. The voters authorized the bond-issue, and thereafter, the Santa Felicia Dam on Piru Creek and the Lower River Distribution System authorized by the bond issue were completed. The lower river distribution system, often called the Oxnard/Hueneme (O/H) Pipeline, was constructed during the forty year life of the original water delivery agreements. In 1994, the City of Port Hueneme and the Channel Islands Beach Community Services District created a joint powers agency, known as the Port Hueneme Water Agency (PHWA), which would later include also Naval Construction Battalion Center Port Hueneme and Naval Air Warfare Center Point Mugu. The PHWA likewise contracted to utilize the O/H Pipeline to move PHWA's pumping from the seawater intrusion front inland to the Forebay in order to reduce seawater intrusion in the Oxnard Plain Basin."
Thien	Ng	City of Oxnard / Assistant Public Works Director	2 - Basin Setting	2.3- Groundwater Conditions 2.3.4 Groundwater Quality	Additional narrative should be provided addressing the State Department of Drinking Water's requirements for potable water: Nitrate max contaminant level (MCL) is 10 ppm Sulfate secondary MCL is 500 ppm Boron notification level (unregulated) is 1 ppm
Thien	Ng	City of Oxnard / Assistant Public Works Director	2 - Basin Setting	2.3- Groundwater Conditions 2.3.6 Groundwater-Surface Water Connections	Concern regarding the provided quote; "The UWCD model reports stream leakage from the Santa Clara River and Calleguas Creek into the underlying semi-perched aquifer. Numbers from the model represent net stream leakage and do not necessarily indicate direct connection between surface water bodies and groundwater in the semi-perched aquifer." (Page 2-42) This statement contradicts the following statements made in Section 3 (See Page 3-19): "The selected groundwater elevations are anticipated to protect against depletion of interconnected surface water, because historical groundwater elevations in the semi-perched aquifer have maintained the documented and potential GDEs in the Subbasin . . ."

Commenter		Chapter	Section	Subsection	Comment
Thien	Ng City of Oxnard / Assistant Public Works Director	2 - Basin Setting	2.4-Water Budget	2.4.1 Sources of Water	Additional narrative addressing Article 21 water should be included in the section. This water is unallocated State Water Project water made available to State Water Project contractors on a limited interim interruptible basis. The FCGMA has already invested funds to purchase this water, which should be acknowledged in the GSP.
Thien	Ng City of Oxnard / Assistant Public Works Director	2 - Basin Setting	2.4-Water Budget	2.4.1 Sources of Water	Concern regarding the provided quote; "As discussed in Section 2.4.1.1, Surface Water, the UWCD-diverted surface water from the Santa Clara River may include State Water Project water used for groundwater recharge in UWCD spreading basins or water directly delivered to water users by either the PVP or the PTP." (Page 2-51) Additional reference and incorporation of Article 21 water should be added into section. Under the May, 2019 FCGMA approval, excess unallocated water is planned to be purchased and delivered via the Santa Clara River and diverted from the Freeman Diversion to recharge facilities in the Oxnard Forebay by United Water Conservation District (UWCD).
Thien	Ng City of Oxnard / Assistant Public Works Director	2 - Basin Setting	2.4-Water Budget	2.4.1 Sources of Water	Concern regarding the provided quote; "Much of the rain that falls in the Oxnard Subbasin quickly returns to the atmosphere via evaporation, or runs off to creeks, storm drains, and ultimately the ocean; the remainder percolates into the soil where it is subject to evapotranspiration (ET), soil absorption, or for plant use." (Page 2-52) Evapotranspiration depends on what the farmers are growing. This should be subject to change dependent on numerous factors.
Thien	Ng City of Oxnard / Assistant Public Works Director	2 - Basin Setting	2.4-Water Budget	2.4.2 Sources of Water Discharge	Concern regarding the provided quote; "Available data indicate that during the calendar year 2015, a total of 80,814 AF (Table 2-14) of groundwater was extracted from the Oxnard Subbasin, of which, about 69% was for agricultural use (55,973 AF), 30% was for M&I use (24,648 AF), and about 0.2% was for domestic use (193 AF)." (Page 2-55) Clarify that the roughly 70-30 split noted was related to a year when Emergency Ordinance E was in effect, when M&I pumping was restricted a second time (after being restricted once before) though Agricultural extraction was not restricted; thus, this split of water is not indicative of the proportionate use as between these groups. This should be expressly stated in the GSP.
Thien	Ng City of Oxnard / Assistant Public Works Director	2 - Basin Setting	2.4-Water Budget	2.4.3 Current and Historical Water Budget Analysis	Concern regarding Section 2.4.3.3 Current (2015) Groundwater Conditions This is no longer the current year. Update to reflect more current year or revise section.
Thien	Ng City of Oxnard / Assistant Public Works Director	2 - Basin Setting	2.4-Water Budget	2.4.5 Projected Future Water Budget and Sustainable Yield	Section 2.4.5 Projected Future Water Budget and Sustainable Yield Specific to model scenarios with a different percentage of reduction in pumping between UAS and LAS. It is assumed that these scenarios are conceptual in nature for the exercise of bracketing sustainable yield estimates. It does not appear probable that the FCGMA can reduce pumping differentially from wells in the LAS without projects to replace their supply since the FCGMA dictated the replacement of UAS wells with LAS wells in the 1980's and early 1990's.
Thien	Ng City of Oxnard / Assistant Public Works Director	2 - Basin Setting	2.4-Water Budget	2.4.5 Projected Future Water Budget and Sustainable Yield	Concern regarding the provided quote; "The sustainable yield was determined from the model scenarios that did not result in a net flux of seawater into either the UAS or the LAS in Oxnard Subbasin, within the level of the model uncertainty, during the 30-year sustaining period (Figure 2-63, Coastal Flux from the UWCD Model Scenarios)." (Page 2-62) None of the model scenarios resulted in no net flux of seawater into either the UAS or LAS in the Subbasin as reflected in Figure 2-63. Provide clarification on which model scenario was projected to be the objective outcome.

Commenter		Chapter	Section	Subsection	Comment
Thien	Ng	City of Oxnard / Assistant Public Works Director	2 - Basin Setting	2.4-Water Budget	2.4.5 Projected Future Water Budget and Sustainable Yield Section 2.4.5 Projected Future Water Budget and Sustainable Yield Only 6 of the 8 modeled scenarios are provided in bullet points. Additional modeled scenarios in Section 2.4.5.7 should be included.
Thien	Ng	City of Oxnard / Assistant Public Works Director	2 - Basin Setting	2.4-Water Budget	2.4.5 Projected Future Water Budget and Sustainable Yield Concern regarding the provided quote; "The 1930 to 1979 50-year period with the 2070 DWR climate-change factor was found to be the most conservative and was used for the comparison with the other modeling simulations conducted." (Page 2-63) Because the most conservative period was used for analysis, the FCGMA Board should keep this in mind when implementing initial pumping reduction management strategy.
Thien	Ng	City of Oxnard / Assistant Public Works Director	Executive Summary	ES.5-Projects and Management Actions	N/A Requested Revision on Page ES-8 "Under this project, the City of Oxnard's Groundwater Recovery Enhancement and Treatment (GREAT) Program's Advanced Water Purification Facility (AWPF) will provide the Subbasin with a source of reclaimed water that can be used for landscape irrigation, agricultural, industrial process water, and groundwater recharge" to "Under this project, the City of Oxnard's Groundwater Recovery Enhancement and Treatment (GREAT) Program's Advanced Water Purification Facility (AWPF) could provide the Subbasin with a source of reclaimed water that can be used for landscape irrigation, agricultural, industrial process water, and/ or groundwater recharge lieu of pumping, at full price, with no exchange of recycled water pumping allocations."
Thien	Ng	City of Oxnard / Assistant Public Works Director	1 - Administrative Information	1.2-Agency Information	1.2.6 Groundwater Sustainability Plan Implementation and Cost Estimate Requested Revision on Page 1-9 "form other GSAs in basin.." to "from other GSAs, in the basin.."
Thien	Ng	City of Oxnard / Assistant Public Works Director	1 - Administrative Information	1.4-Existing Monitoring and Management Plans	1.4.3 Operational Flexibility Limitations Requested Revision on Page 1-22 "Examples of projects that have increased operational flexibility within the Oxnard Plain include the City of Oxnard's Groundwater Recovery Enhancement and Treatment (GREAT) project, and the Oxnard-Hueneme (OH) Pipeline and the Freeman Diversion Project, both operated by UWCD (Table 1-11)." to "Examples of projects that have increased operational flexibility within the Oxnard Plain include the City of Oxnard's Groundwater Recovery Enhancement and Treatment (GREAT) Program, and the Oxnard-Hueneme (OH) Pipeline and the Freeman Diversion Project, both operated by UWCD (Table 1-11)."
Thien	Ng	City of Oxnard / Assistant Public Works Director	1 - Administrative Information	1.4-Existing Monitoring and Management Plans	1.4.3 Operational Flexibility Limitations Requested Revision on Page 1-22 "Despite the coordination of projects and programs within the Oxnard Subbasin, limits to operational flexibility remain. These limits include constraints imposed by interaction with other regulatory programs, including the federal Endangered Species Act and the Recycled Water Policy (2009, amended 2013) that was adopted by the State Water Resources Control Board." to "Despite the coordination of projects and programs within the Oxnard Subbasin, limits to operational flexibility remain. State law prohibits the direct potable use of recycled water. Also, these limits include constraints imposed by interaction with other regulatory programs, including the federal Endangered Species Act and the Recycled Water Policy (2009, amended 2013) that was adopted by the State Water Resources Control Board. "

Commenter		Chapter	Section	Subsection	Comment
Thien	Ng City of Oxnard / Assistant Public Works Director	1 - Administrative Information	1.5-Existing Conjunctive- Use Programs	N/A	Requested Revision on Page 1-24 "Several of the projects and management actions identified in this GSP (Chapter 5) would build upon the GREAT program by expending the AWPf's capacity, increasing utilization of the recycled water in lieu of groundwater for irrigation, and connecting the recycled water delivery system to groundwater recharge facilities operated by UWCD." to "Several of the projects and management actions identified in this GSP (Chapter 5) would build upon the GREAT program by expanding the AWPf's capacity, increasing utilization of the recycled water in lieu of groundwater for irrigation. REMOVE FROM DOCUMENT:, and connecting the recycled water delivery system to groundwater recharge facilities operated by UWCD.
Thien	Ng City of Oxnard / Assistant Public Works Director	1 - Administrative Information	1.5-Existing Conjunctive- Use Programs	N/A	Requested Revision on Page 1-24 "Reduced groundwater allocations may put increased pressure on water purveyors to use the maximum SWP allocations available, which are already highly limited by climate and competing demands." to "Reduced groundwater allocations may put increased pressure on water purveyors to use the maximum SWP allocations available, which are already very expensive and highly limited by climate and competing demands."
Thien	Ng City of Oxnard / Assistant Public Works Director	1 - Administrative Information	1.5-Existing Conjunctive- Use Programs	N/A	Requested Revision on Page 1-24 "Several of the projects and management actions identified in this GSP (Chapter 5) would build upon the GREAT program by expending the AWPf's capacity, increasing..." to "Several of the projects and management actions identified in this GSP (Chapter 5) could build upon the GREAT program by expending the AWPf's capacity, increasing..."
Thien	Ng City of Oxnard / Assistant Public Works Director	1 - Administrative Information	1.6-Land Use Elements or Topic Categories of Applicable General Plans	1.6.2 Urban Water Management Plans	Requested Revision on Page 1-33 "Potential UWCD projects to be implemented in the future include the Full Advanced Treatment Program, which would entail a collaborative agreement between the City of Oxnard and several agricultural entities to deliver recycled water from the City of Oxnard's AWPf through UWCD's Pumping Trough Pipeline and the Pleasant Valley Pipeline for agricultural users in the Oxnard Plain." Remove this quote entirely from document.
Thien	Ng City of Oxnard / Assistant Public Works Director	1 - Administrative Information	1.6-Land Use Elements or Topic Categories of Applicable General Plans	1.6.2 Urban Water Management Plans	Requested Revision on Page 1-35 "Oxnard's water supplies include imported water from CMWD, groundwater from UWCD, and groundwater produced from local wells." to "Oxnard's water supplies include imported water from CMWD, groundwater pumped by UWCD as part of a supply agreement negotiated in 1996, and groundwater produced from local wells."
Thien	Ng City of Oxnard / Assistant Public Works Director	1 - Administrative Information	1.6-Land Use Elements or Topic Categories of Applicable General Plans	1.6.2 Urban Water Management Plans	Requested Revision on Page 1-36 "Consumers of this recycled water include PVCWD and some agricultural operators. Potential consumers include PHWA and UWCD (City of Oxnard 2015)." Remove quote entirely from document. There are many more potential customers than what are listed.

Commenter		Chapter	Section	Subsection	Comment
Thien	Ng	City of Oxnard / Assistant Public Works Director	1 - Administrative Information	1.6-Land Use Elements or Topic Categories of Applicable General Plans 1.6.2 Urban Water Management Plans	Requested Revision on Page 1-37 "Because the City of Oxnard is a coastal city partially dependent on groundwater extractions and UWCD supplies, its UWMP will be impacted by these GSP components." to "Because the City of Oxnard is a coastal city significantly dependent on groundwater extractions, its UWMP will be impacted by these GSP components."
Thien	Ng	City of Oxnard / Assistant Public Works Director	1 - Administrative Information	1.7-Well Permitting Policies and Procedures 1.7.1 FCGMA	Requested Revision on Page 1-42 "The permitting agencies monitor and enforce these standards by requiring drilling contractors with a valid C-57 license to submit permit applications for the construction, modification..." to "The permitting agencies monitor and enforce these standards by requiring drilling contractors with the appropriate valid contractor's license to submit permit applications for the construction, modification..."
Thien	Ng	City of Oxnard / Assistant Public Works Director	1 - Administrative Information	1.8- Notification and Communication 1.8.2 Summary of Beneficial Uses and Users	Requested Revision on Page 1-45 " Beneficial uses of groundwater from the Oxnard Subbasin include agricultural, M&I, urban, and environmental uses." to "Beneficial uses of groundwater from the Oxnard Subbasin include agricultural, M&I, and environmental uses."
Thien	Ng	City of Oxnard / Assistant Public Works Director	2 - Basin Setting	2.3-Groundwater Conditions 2.3.3 Seawater Intrusion	Requested Revision on Page 2-27 "An elevated risk of seawater intrusion has been found to exist near Port Hueneme and Point Mugu due to the near shore presence of the groundwater-seawater contact in deeply incised submarine canyons (UWCD 2016a). " to "An elevated risk of seawater intrusion has been found to exist near Port Hueneme and Point Mugu due to the near shore presence of the groundwater-seawater contact in deeply incised submarine canyons (UWCD 2016a). Due to this higher risk at Oxnard's coastal area, the City of Oxnard chose to cease pumping in that area and instead entered into the OH pipeline agreement with UWCD."
Thien	Ng	City of Oxnard / Assistant Public Works Director	2 - Basin Setting	2.4-Water Budget 2.4.1 Sources of Water	Requested Revision on Page 2-47 "These municipal users may also receive imported water supplied by the CMWD. " to "These municipal users also receive imported water supplied by the CMWD, which has been purchased in lieu of greater amounts of groundwater pumping."
Thien	Ng	City of Oxnard / Assistant Public Works Director	2 - Basin Setting	2.4-Water Budget 2.4.1 Sources of Water	Requested Revision on Page 2-47 "UWCD's water source for the PTP and PVP consists primarily of surface water obtained at the Freeman Diversion, which may include State Water Project water from Lake Piru." to "UWCD's water source for the PTP and PVP consists primarily of surface water obtained at the Freeman Diversion, which may include State Water Project water from Lake Piru and Article 21 imported water."

Commenter		Chapter	Section	Subsection	Comment
Thien	Ng City of Oxnard / Assistant Public Works Director	2 - Basin Setting	2.4-Water Budget	2.4.1 Sources of Water	Requested Revision on Page 2-49: "These diversions may include State Water Project water held at Lake Piru and then delivered to the UWCD via the Santa Clara River." to "These diversions may include State Water Project water held at Lake Piru and then delivered to the UWCD via the Santa Clara River and purchased imported water."
Thien	Ng City of Oxnard / Assistant Public Works Director	2 - Basin Setting	2.4-Water Budget	2.4.3 Current and Historical Water Budget Analysis	Requested Revision on Page 2-51: "However, the first phase of the GREAT program's Advanced Water Purification Facility (AWPF) was recently completed, which provides this supply to PVCWD and other growers on the southern part of the Oxnard Subbasin." to "However, the first phase of the GREAT program's Advanced Water Purification Facility (AWPF) was completed in 2015, which provides this supply to PVCWD and other growers on the southern part of the Oxnard Subbasin."
Thien	Ng City of Oxnard / Assistant Public Works Director	2 - Basin Setting	2.4-Water Budget	2.4.2 Sources of Water Discharge	Requested Revision on Page 2-55: "Error! Reference source not found." Revise with the correct input reference.
Thien	Ng City of Oxnard / Assistant Public Works Director	3 - Sustainable Management Criteria	3.2-Sustainability Goal	N/A	Requested Revision on Page 3-2: "Proposed reductions in groundwater production must take into account both the potential economic disruption to the agricultural industry in the Subbasin, and the uncertainty in the estimated sustainable yield of the Subbasin." to "Proposed reductions in groundwater production must take into account both the potential economic disruption to the agricultural industry in the Subbasin, the greater economic effects on the basin as a whole, the interference with municipal water supply planning and rate setting, and the uncertainty in the estimated sustainable yield of the Subbasin."
Thien	Ng City of Oxnard / Assistant Public Works Director	3 - Sustainable Management Criteria	3.2-Sustainability Goal	N/A	Requested Revision on Page 3-2: "If production is reduced linearly between 2020 and 2040, the estimated groundwater production reduction necessary throughout the geographic extent of the Oxnard Subbasin over the first 5 years is approximately 4,500 AFY." to "If production is reduced linearly between 2020 and 2040, the estimated groundwater production reduction necessary throughout the geographic extent of the Oxnard Subbasin over the first 5 years is approximately 4,500 AF total (900 AFY)."
Thien	Ng City of Oxnard / Assistant Public Works Director	3 - Sustainable Management Criteria	3.3-Undesirable Results	3.3.1 Chronic Lowering of Groundwater Levels	Requested Revision on Page 3-4: "It is expected that there will be some landward migration of this front between 2020 and 2040 as the FCGMA Board and stakeholders in the Subbasin undertake the necessary projects and management actions toward achieving sustainability in 2040." to "It is expected that there will be some landward migration of this front between 2020 and 2040 as the FCGMA Board and stakeholders in the Subbasin undertake projects and management actions toward achieving sustainability in 2040."
Thien	Ng City of Oxnard / Assistant Public Works Director	3 - Sustainable Management Criteria	3.3-Undesirable Results	3.3.2 Reduction of Groundwater Storage	Requested Revision on Page 3-5: "Numerical groundwater model simulations indicate that there has been approximately 101,000 acre-feet (AF) of storage loss in the Oxnard Subbasin over the 31 years from 1985 to 2015 (Section 2.3.2, Estimated Change in Storage; Appendix C)." This is the wrong reference of Appendix C. Revise with the corresponding reference.

Commenter		Chapter	Section	Subsection	Comment
Thien	Ng City of Oxnard / Assistant Public Works Director	3 - Sustainable Management Criteria	3.3- Undesirable Results	3.3.6 Depletions of Interconnected Surface Water	Requested Revision on Page 3-10: "This unit is not currently considered a principal aquifer of the Oxnard Subbasin (Section 2.2.4, Principal Aquifers and Aquitards)." This is the wrong reference of Section 2.2.4. Revise with corresponding Section reference.
Thien	Ng City of Oxnard / Assistant Public Works Director	3 - Sustainable Management Criteria	3.4-Minimum Thresholds	3.4.1 Chronic Lowering of Groundwater Levels	Requested Revision on Page 3-14: "It is important to remember that there are several sources of uncertainty in the model predictions. These sources of uncertainty include, but are not limited to, the prediction of future climate, future diversions from the Santa Clara River, and future groundwater production distribution in the Subbasin. The uncertainty in each of these factors is anticipated to decrease with time. As these factors are better understood, the minimum thresholds should be reassessed, and adjustments should be made, when warranted by the assessment." to "It is important to remember that there are several sources of uncertainty in the model predictions. These sources of uncertainty include, but are not limited to, the prediction of future climate, future diversions from the Santa Clara River, groundwater model assumptions and assigned values, and future groundwater production distribution in the Subbasin. The uncertainty in each of these factors is anticipated to decrease with time. As these factors are better understood, the minimum thresholds should be reassessed, and adjustments should be made, when warranted by the assessment."
Thien	Ng City of Oxnard / Assistant Public Works Director	3 - Sustainable Management Criteria	3.4-Minimum Thresholds	3.4.3 Seawater Intrusion	Requested Revision on Page 3-17: "Such a reduction may impact the value of agricultural land, drive changes in crop types, result in temporary fallowing of agricultural acreage, and cause economic disruption to the regional economy." to "Such a reduction may impact the value of land, drive changes in crop types, result in temporary fallowing of agricultural acreage, impede development, raise water rates, and cause economic disruption to the regional economy."
Thien	Ng City of Oxnard / Assistant Public Works Director	Tables	3-1 Minimum Threshold Groundwater Elevations by Well, Management Area, and Aquifer for Key Wells in the Oxnard Subbasin	N/A	The following wells; 02N21W07L06S 02N22W23B07S 02N22W36E05S 02N22W23B04S 02N22W23B05S 02N22W23B06S 02N22W36E03S 02N22W36E04S 01N23W01C02S 02N21W07L04S 01N21W07J02S 01N21W21H02S 02N21W07L03S 02N21W07L05S Do not match Table 3-2 proposed minimum thresholds. The included wells are recorded differently between the two tables and should be revised to coordinate.

Commenter		Chapter	Section	Subsection	Comment	
Thien	Ng	City of Oxnard / Assistant Public Works Director	Tables	3-2 Measurable Objectives and Interim Milestones	N/A	<p>The following wells; 02N21W07L06S 02N22W23B07S 02N22W36E05S 02N22W23B04S 02N22W23B05S 02N22W23B06S 02N22W36E03S 02N22W36E04S 01N23W01C02S 02N21W07L04S 01N21W07J02S 01N21W21H02S 02N21W07L03S 02N21W07L05S</p> <p>Do not match Table 3-1 proposed minimum thresholds. The included wells are recorded differently between the two tables and should be revised to coordinate.</p>
Thien	Ng	City of Oxnard / Assistant Public Works Director	4 - Monitoring Networks	4.2- Description of Existing Monitoring Network	4.2.2 Surface Conditions Monitoring	<p>Requested Revision on Page 4-4: "These diversions are used to deliver surface water to agricultural users in lieu of groundwater production and are used for recharge, via UWCD's spreading grounds, to the groundwater aquifers in the Subbasin." to "These diversions are used to deliver surface water to agricultural users in conjunction with groundwater production used for recharge, via UWCD's spreading grounds, to the groundwater aquifers in the Subbasin."</p>
Thien	Ng	City of Oxnard / Assistant Public Works Director	4 - Monitoring Networks	4.6-Potential Monitoring Network Improvements	4.6.1 Water Level Measurements: Spatial Data Gaps	<p>Requested Revision on Page 4-13: "A monitoring well in this area would help constrain groundwater gradients in the northwestern Subbasin." to "A monitoring well in this area would help constrain groundwater gradients in the northwestern area of the Subbasin."</p>
Thien	Ng	City of Oxnard / Assistant Public Works Director	5 - Project Management Actions	5.1- Introduction to Projects and Management Actions	N/A	<p>Requested Revision on Page 5-1: "As currently envisioned, the projects in this GSP would be implemented by the project proponent or sponsoring agency. However, FCGMA may opt to implement projects in the future as necessary to achieve sustainability in the Subbasin." to "As currently envisioned, the projects in this GSP would be implemented by the project proponent or sponsoring agency at its discretion and with full compensation. However, FCGMA may opt to implement its own additional projects in the future as necessary to achieve sustainability in the Subbasin."</p>

Commenter		Chapter	Section	Subsection	Comment	
Thien	Ng	City of Oxnard / Assistant Public Works Director	5 - Project Management Actions	5.2-Project No. 1 – GREAT Program Advanced Water Purification Facility	N/A	<p>Requested Revision on Page 5-2:</p> <p>"The AWPf is designed to initially treat approximately 8 to 9 million gallons per day (mgd) of secondary effluent from the Oxnard Wastewater Treatment Plant and produce 6.25 mgd of product water for reclaimed water uses. This is equivalent to 7,000 acre-feet per year (AFY) of product water that can be delivered through existing infrastructure. The AWPf is currently producing up to 4,600 AFY. Advanced purified water was first delivered to agricultural operators in 2016. The portion of the project that is being considered for inclusion in GSP is the additional water that is being purchased by FCGMA to reduce groundwater extractions for which no Recycled Water Pumping Allocation is issued."</p> <p>to</p> <p>"The AWPf is designed to initially treat approximately 8 to 9 million gallons per day (mgd) of secondary effluent from the Oxnard Wastewater Treatment Plant and produce 6.25 mgd of product water for reclaimed water uses. This is equivalent to 7,000 acre-feet per year (AFY) of product water that can be delivered through existing infrastructure. The AWPf is currently producing up to 4,600 AFY. Advanced purified water was first delivered to agricultural operators in 2016. By agreement and in accordance with FCGMA Resolution 13-02, the City receives Recycled Water Pumping Allocations at one acre-foot for each acre-foot of recycled water use that results in decreased groundwater pumping. The project that is being considered for inclusion in the GSP is to provide recycled water for landscape irrigation, agricultural, industrial process water and/ or groundwater recharge in lieu of pumping with FCGMA providing payment in exchange of recycled water pumping allocations."</p>
Thien	Ng	City of Oxnard / Assistant Public Works Director	5 - Project Management Actions	5.2-Project No. 1 – GREAT Program Advanced Water Purification Facility	N/A	<p>Requested Revision on Page 5-4:</p> <p>"The City of Oxnard receives a Recycled Water Pumping Allocation for delivered water used by farmers in lieu of groundwater production. Implementation"</p> <p>to</p> <p>"The City of Oxnard receives payment plus a Recycled Water Pumping Allocation for delivered water used by farmers in lieu of groundwater production. Implementation"</p>
Thien	Ng	City of Oxnard / Assistant Public Works Director	5 - Project Management Actions	5.2-Project No. 1 – GREAT Program Advanced Water Purification Facility	N/A	<p>Requested Revision on Page 5-4:</p> <p>"The cost of the water produced by the GREAT Program AWPf Project is approximately \$3,100 per AF."</p> <p>Remove quote entirely from GSP.</p>
Thien	Ng	City of Oxnard / Assistant Public Works Director	5 - Project Management Actions	5.3-Project No. 2 – GREAT Program Advanced Water Purification Facility Expansion Project	N/A	<p>Requested Revision on Page 5-5:</p> <p>"GREAT Program AWPf Expansion Project water was included in future groundwater modeling scenarios to examine the impact that the project will have on the sustainability criteria. This project was incorporated in the modeling along with the GREAT Program AWPf Project (see Section 5.2, Project No. 1 – GREAT Program Advanced Water Purification Facility) and the temporary fallowing of agricultural land (see Section 5.6). Therefore, the relationship between the impact of this project alone and the sustainability indicators has not been quantified. Rather, the potential effect of this project in the context of all of three of these projects is presented in this discussion."</p> <p>Remove Section 5.3.2 from Document.</p>

Commenter		Chapter	Section	Subsection	Comment
Thien	Ng City of Oxnard / Assistant Public Works Director	5 - Project Management Actions	5.4-Project No. 3 – RiverPark–Saticoy GRRP Recycled Water Project	N/A	Requested Revision on Page 5-8: "The RiverPark–Saticoy GRRP Recycled Water Project is the same as the GREAT Program AWPf Expansion Project, as incorporated into the numerical groundwater model simulations, because the RiverPark–Saticoy GRRP Recycled Water Project simply provides the infrastructure to convey the water. It does not provide additional water to the Subbasin beyond what was modeled for the GREAT Program AWPf project." to "The RiverPark–Saticoy GRRP Recycled Water Project simply provides the infrastructure to convey the water and is dependent upon the GREAT Program AWPf Expansion Project. This was incorporated into the numerical groundwater model simulations. It does not provide additional water to the Subbasin beyond what was modeled for the GREAT Program AWPf project."
Thien	Ng City of Oxnard / Assistant Public Works Director	5 - Project Management Actions	5.9- Management Action No. 3 – Water Market Pilot Program	N/A	Requested Revision on Page 5-17: "5.9 MANAGEMENT ACTION NO. 3 – WATER MARKET PILOT PROGRAM" to "5.8 MANAGEMENT ACTION NO. 2 – WATER MARKET PILOT PROGRAM"
Thien	Ng City of Oxnard	Executive Summary	ES.1- Introduction	N/A	Requested Revision in footnote 1, Page ES-1 "Sources of water high in chloride in the Oxnard Subbasin include modern-day seawater as well as non-marine brines and connate water in fine-grained sediments." to "Sources of water high in chloride in the Oxnard Subbasin include modern-day seawater as well as non-marine brines and connate brines in fine-grained sediments."