

Comments on GSP for East Las Posas

My name is Lori Craviotto and I am an avocado and citrus grower in the East Las Posas basin area. I farm a little over 200 acres with my family. I am also acting treasurer for Fuller Falls Mutual Water Company.

My undergraduate degree is in Biology, I taught high school science as a young woman before becoming a doctor of chiropractic, owning my own clinic and practicing for over 20 years. The last 12 years I have been involved with my family's 200 plus acre avocado and citrus farm (Grace Farms and Orchards). I have been working as overall farm manager for about the last 8 or 9 years. During this time I have also worked with a nonprofit as a board member and also as the director of the board. The nonprofit dealt with community development in Haiti. My background has given me a love for science and some understanding of the issues involved in developing sustainable solutions.

First, let me say, I do appreciate all the effort that has gone into creating the Groundwater Sustainability Plan for the Las Posas Basin. It is a huge undertaking and I think that much of the work has been thankless so let me start my comments by saying thank you. The work has been impressive and the presentations informative. I appreciate the openness of DUDEK to incorporate the suggestions that have come up during the presentations into the GSP. I have learned a lot about our water situation in East Las Posas basin during this process. While the process may be grueling it is actually a really good thing that people care. So often we all feel helpless to affect change in our governments and it has been wonderful to see people involved in this process. So again, thank you for reading our comments and listening to us and taking our thoughts into consideration.

1)

The most important comment that I want to make is that I have come to believe that the GSP should consider the **loss of agricultural**

acreage (particularly avocado and fruit orchards) an undesirable outcome in the GSP. Orchards in Ventura County provide food, fire protection, animal habitat and jobs while counteracting global warming. In fact, there is no better counteracting force on global warming than trees. Taking carbon out of the air and putting it into the soil and organic matter is what trees do. We need good quality water to protect avocado and citrus orchards in Ventura County. We also need those trees and orchards to support cooler microclimates and watershed areas. I have seen what happens to microclimate firsthand during my trips to Haiti. When an area loses its trees, it is up to 15 degrees hotter and there is erosion.

While last year many farmers lost their crops due to the fires, heat and freeze the irrigated orchards provided another benefit. Irrigated orchards provided green belts that kept many people, homes and animals safe from wildfires that were raging out of control last year and saving countless acre-feet in water by effectively stopping the fires in their tracks. Isn't growing trees that produce food a better use of our water than using it for wildfire control if it can have the same effect?

Losing agriculture in Ventura, especially our orchards, due to inadequate or poor quality water would have such a devastating negative impact that agriculture needs to be protected through the GSP. Losing trees specifically should be considered a "stand alone" negative outcome as opposed to simply a negative economic impact. Over time, the pressure of ever growing populations and other economic factors will come into play making water expensive and harder to come by. This can only lead to urban development replacing orchards unless we protect against the loss of our precious orchards in the GSP. Now is the time to put language into the GSP to help keep our part of the world a better place. It's only a short trip to LA to see what happens when agriculture becomes less economically viable than development.

As far as water allocations, ratcheting down agricultural water significantly over time by decreasing agricultural well extractions **will cause** the undesirable affect of losing avocado and citrus orchards. It is just a matter of time. We need water to grow the trees that protect the environment. For reference, the irrigation allocations set by Fox

Canyon GMA under Emergency Ordinance E are pretty “right on” in terms of what we actually need to farm productively and profitably. I understand that many of the farmers are only using 70% of their allocation and I notice that even within our small Mutual Water Company there are farmers using less water than is required to have profitable groves. I also notice that our farm and some of the other more profitable farms in our area regularly bump up against or go over the water allocations in Emergency Ordinance E. Having quality water and enough of it is the biggest part of what produces a vibrant and profitable avocado and citrus farm. Ratcheting down won't work because our trees don't need less water over time, we would have to either cut them down or watch them die. The farmers who need to make a living farming would sell. Only the very wealthy people can farm an unprofitable farm. We are being allocated the correct amount right now for avocado and citrus farming.

To conclude this point, let's protect our orchards by including the loss of orchards in our East Las Posas area an undesirable outcome. Orchards and forests all over California should be protected just because it may well be the only timely thing we can do to help stop global warming. There is plenty of literature about how important protecting trees is in the fight for climate control. Could we perhaps start something really good movement with our GSP? It seems that we are ahead of many other GSPs in California. **By making the loss of orchards a negative outcome in the GSP and making it a priority to give orchards access to the water they need our GSP would be helping our local environment, as well as, doing our part against global warming.**

2)

From the GSP (1-12) it is my understanding that Ventura County has been given permission to create it GSPs for parts of the Los Posas Valley basin that are not within the boundaries of the Fox Canyon GMA yet may fall within an aquifer system managed by FCGMA. While this may be legally correct it does not make good common sense. The GSP should be one document for each of the individual aquifer systems. I agree with splitting East Las Posas and Grimes, West Las Posas etc. into separate areas as the water isn't necessarily moving between them however, any unincorporated

areas within those aquifer systems need to be incorporated into the GSP. Otherwise, I don't understand how the GSP can create a management plan that works without Ventura county agreeing unequivocally not to take any additional water out of those systems in the future or agreeing to take a set amount equivalent to the amount it is taking now less any agreed upon pumping cuts required by the GSP.

3)

On page 1-3, under 1.2.3 there are only seven mutual water companies and districts listed as being within FCGMA. I imagine that you are aware that this error needs to be corrected as it is not true. There are many more mutual water companies.

4)

I am concerned about the Simi Valley recharge discussed as part of Project 3 coming into the Las Posas aquifer as my understanding is that it has high sodium concentrations of 175-200mg/L. I believe the sodium in our water is 0-25 mg/L of sodium now. What increased sodium in the water does in practical terms to farmers is decrease production and to create a situation where farmers need to apply water for longer periods of time to flush sodium past the root zone of there trees. The amount of extra watering time per tree that we are talking about is about 8 hours per week according to a friend of mine who farms both on our ranch (in East Las Posas area) and in San Diego County (where salt concentrations are high). This is clearly undesirable if the idea is to conserve water because it will increase the water requirements. Apparently, the salt plume is already heading towards our farm and this is not a good thing at all. I think the mention of the critical need for desalination of that water is a must if it is to be included as a project. Otherwise, it is my opinion that it can only be considered as "degrading our water quality." I am all in favor of it as a project as long as it is desalinated.

5)

I am also concerned about the CMWD ASR project which the GSP addresses. I believe that the GSP might be reasonably expected to make a recommendation that the project's storage of 50,000 AF in the Fox Canyon Aquifer may not be 100% available since it is impossible to know at this point where all the water outlets in the

basin are. It seems reasonable to infer that there are underground outlets and unreasonable and counterintuitive to assume that all water stored is 100% available all the time. I believe that it is incumbent upon the GSP to address this issue as opposed to making the assumption that “water-in” necessarily equals water-out. Along the same lines, it seems that where the water in Las Posas basin enters (or comes from) is not known. Knowing where the water is coming from would be worth investigating and might shed some light on where it might be able to go and vice-versa.

6)

As far as climate change as addressed on page 1-17, isn't it possible that decreased precipitation, in our area, is actually a less likely consequence of global warming due to the fact that warming currents off our coasts have tended in the past to bring more precipitation? I would like to take a wait and see approach when figuring the decreased rainfall factor into the GSP's climate change calculations or at least be very conservative and use the 2% vs. the 5%. The next decade may make it clear if we are seeing more or less precipitation in our area.

Again, thank you for reading and considering my comments as part of the GSP process. Please feel free to call me if you have any questions and/or you may mail/email any response to: 530 Los Angeles Ave. #115-330, Moorpark, CA. 93021 or lori.farmandarins@gmail.com

Sincerely,
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