

LAS POSAS USERS GROUP

September 20, 2019

Jeffery Pratt, P.E., Executive Officer
Fox Canyon Groundwater Management Agency
800 S. Victoria Avenue
Ventura, CA 93009

Dear Mr. Pratt,

Subject: DRAFT Groundwater Sustainability Plan for the Las Posas Valley Basin

The Las Posas Users Group (LPUG) appreciates the opportunity to review the *Draft Groundwater Sustainability Plan for Las Posas Valley Basin* prepared by Dudek on behalf of the Fox Canyon Groundwater Management Agency (FCGMA) and dated July 2019.

LPUG formed prior to the Sustainable Groundwater Management Act (SGMA) as a voluntary stakeholder group to promote the interests of beneficial users of groundwater in the Las Posas Valley Groundwater basin. LPUG's role as an advisory group to the FCGMA was later formalized through an FCGMA Charter in April 2016 with the goal of developing a groundwater pumping allocation system for inclusion into the Groundwater Sustainability Plan (GSP).

LPUG conducted public meetings and sent notifications to landowners in the Las Posas Valley Basin resulting in a collaborative effort between the FCGMA and various groundwater users in drafting an allocation system to encourage sustainable, long-term management of our basin's groundwater resources.

The most recent iteration of the allocation system was summarized in a white paper dated June 16, 2017 and presented to the FCGMA Board of Directors on June 23, 2017. At that meeting, FCGMA staff was directed to work with LPUG and the Las Posas Valley Water Rights Coalition (LPVWRC) to resolve pending issues with the proposed allocation system.

FCGMA staff failed to convene both groups for meaningful discussion and concurrence on those unsettled issues. Instead, the FCGMA continued work on their draft GSP and in November 2017 released the *Preliminary Draft GSP for the Las Posas Valley Basin*. That preliminary draft stated a "comprehensive water allocation system for groundwater users in the LPVB is currently under development by the FCGMA, with ongoing contributions from stakeholder groups." However, the FCGMA did not maintain open communication with LPUG to refine the allocation system and declined invitations to participate in LPUG meetings to foster a stakeholder-led collaborative forum for GSP feedback.

FCGMA continued revising their draft GSP with minimal stakeholder feedback to produce the most recent Draft GSP for the Las Posas Valley Basin dated July 2019. The current version of the draft GSP does not include an allocation system and Section 1.8.2 incorrectly states that LPUG "withdrew its support for the proposed system it had developed."

LPUG Letter to the FCGMA

LPUG has never submitted formal documentation to the FCGMA indicating withdrawal of support for their allocation system. In fact, LPUG continues to support their proposed allocation system and recognizes the divergence on issues already discussed among the LPVWRC and LPUG.

The statement indicating LPUG withdrew their support should be removed from the Draft GSP to have an accurate representation of the facts.

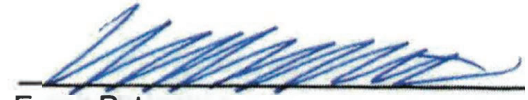
To include such an egregious statement can only serve as an impetus for the FCGMA to dismiss the synergistic effort put forth by LPUG and various groundwater users to develop an appropriate and collaborative allocation system and instead create an independent allocation system devoid of stakeholder input.

LPUG looks forward to seeing a revised GSP with this misleading statement removed.

Respectfully,



Andrew Waters, III
LPUG Chairperson



Esper Petersen
LPUG Vice-Chairperson