

FCGMA Draft Groundwater Sustainability Plan Comments

September 2019

Las Posas Valley Basin

Commenter			Chapter	Section	Subsection	Comment
Susan Paulsen	Exponent, Inc		Executive Summary	ES.1-Introduction	N/A	Please find our attached document with all comments on the entirety of the GSP. Thank you.
Susan Pan	County of Ventura, Public Works Agency, Water and Sanitation		3 - Sustainable Management Criteria	3.4-Minimum Thresholds	3.4.2-East Las Posas Management Area	<p>Section 3.4.2.4 Degraded Water Quality "Groundwater modeling suggests that groundwater production rates exerts little influence over the area of the ELPMA that will eventually be impacted by higher concentrations of TDS (Figures 3-3 through 3-7)."</p> <p>The continuous groundwater quality deterioration in the East Las Posas Basin may not be directly related to groundwater pumping and more related to the source of surface water recharge from the regional wastewater treatment plants, which is a main source of water supply that the Basin continues to rely on. As shown in Figures 3-3 through 3-7, the groundwater modeling shows that all five scenarios projected the salt plume expansion to about double in size/area in the next 50 years. It means that the groundwater well production from the salt plume impacted area may become limited in use or unusable as certain farm crops can not tolerate high salt level. Blending with imported water or field leaching are not permanent solutions, as salts remain deposited and built up in the East Las Posas Basin. The issue of salt removal from the basin needs to be managed.</p>
Dan Detmer	UWCD		5 - Project Management Actions	5.2-Project No. 1 – Purchase of Imported Water from CMWD for Basin Replenishment	N/A	<p>Section 5.2.4 The schedule for implementation of Project No. 1 appears to be described in just one sentence, "Therefore, the project could be implemented after agreements have been completed for the purchase and delivery of the water from CMWD." Will such a vague schedule satisfy the DWR's reviewers of this GSP, or stakeholders in the basin? We recommend including a graphic timeline or chart in this section that illustrates anticipated dates for achieving design/construction milestones for each project, and how those dates relate to the schedule for achieving sustainability in the WLPMA.</p> <p>Section 5.5.7 The schedule for implementation of Management Action No. 1 boils down to the following sentence from the second paragraph, "Because of the existing uncertainty associated with future conditions in the LPVB, a plan for exact reductions and groundwater elevation triggers for those reductions has not been developed as part of this GSP." Will such vague language regarding whether or when Management Action No. 1 would be implemented satisfy DWR or local stakeholders that the GSP can achieve sustainable groundwater conditions in the LPVB by 2040? We recommend including a graphic timeline or chart in this section that illustrates anticipated dates for achieving design/construction milestones for each project, and how those dates relate to the schedule for achieving sustainability in the LPVB.</p>
Dan Detmer	UWCD		3 - Sustainable Management Criteria	3.3-Undesirable Results	3.3.1-Chronic Lowering of Groundwater Levels	<p>Section 3.3.1 In the subsection describing criteria for defining undesirable results for chronic lowering of groundwater levels in the West Las Posas Management Area, it would be helpful if the first paragraph clarified that "the 2015 saline water impact front" being referenced was the saline water front occurring in the Oxnard subbasin.</p> <p>In the subsection describing criteria for defining undesirable results for chronic lowering of groundwater levels in the East Las Posas Management Area, the GSP stats that "Limiting the long-term loss of storage to no more than 20% in these areas of the ELPMA was determined to be a reasonable approach by the FCGMA Board to avoid significant and unreasonable loss of supply." It would be helpful if the text provided more information regarding the basis or rationale that the FCGMA Board used to select 20% as "reasonable," and how that number relates in a quantitative sense to "significant and unreasonable loss of supply." What were the potential impacts of any higher or lower values (than 20%) that the Board considered, and why were those impacts deemed more or less "significant" or "unreasonable" than 20%?</p>
Dan Detmer	UWCD		2 - Basin Setting	2.4-Water Budget	2.4.5-Projected Water Budget and Sustainable Yield	<p>Section 2.4.5.1.9 The third paragraph of this section includes the phrase "this produces an estimate of 1,000 AFY for the aquifer system and 11,500 AFY for the LAS." We suspect the word "shallow" should be inserted before the words "aquifer system" in this phrase, if we are correctly understanding the context.</p> <p>The fourth paragraph of this section states "Additional modeling is recommended for the 5-year update process to understand how changes in pumping patterns can increase the overall sustainable yield of the PVB." We suspect that the reference to "PVB" in this sentence is mistaken, and should be replaced with "WLPMA," which is the area being discussed by this section of the GSP.</p>

Committer		Chapter	Section	Subsection	Comment
Susan Pan	County of Ventura, Water and Sanitation Department	3 - Sustainable Management Criteria	3.5- Measurable Objectives	3.5.2-East Las Posas Management Area	VCWWD No. 1 owns and operates Well No. 15, State Well No. 03N19W31B01S. This well is used as a key well for the Las Posas Basin GSP. Figure 3-10d shows that three of the five future scenarios analyzed, the well water level continues to decline in future years to below minimum threshold level. The only two scenarios that groundwater levels are maintained at sustainable level above the minimum threshold level are with 25% pumping reduction in Fox Canyon Aquifer (FCA) & Grimes Canyon Aquifer (GCA) without projects and with 10% pumping reduction in FCA & GCA with projects implementation. Most of the key wells in the FCA show similar trends in these future scenario analyses. These trends indicate the need for project implementation along with some level of pumping reduction.
Alma	Quezada La Loma Ranch Mutual Water Company	1 - Administrative Information	1.8- Notification and Communication	1.8.1- Notification and Communication Summary	See attached letter.
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. 1-32 <p>We find the characterization of the Arroyo Simi–Las Posas GDE as a losing stream to mischaracterize the groundwater-surface water interconnection and thus it inappropriately concludes that the riparian plants are “using percolating surface water rather than groundwater.” The Arroyo Simi–Las Posas should be characterized as a complex system of losing-gaining-losing reaches across the LPVB; groundwater is shallow and the riparian ecosystem likely uses a combination of unsaturated soil pore water and groundwater to supply its water needs.</p> <p>The GSA has included representation of environmental users on their TAG, in a special meeting on GDEs and in GSP email and meeting notifications. We also recommend that the GSP specifically list 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 addition, both the CA DFW and the US FWS agencies have attended the special TAG GDE meeting.</p>
Ruthie	Redmond The Nature Conservancy	Tables	1-9-Past and Present Land Use in Las Posas Valley, 1990–2015	N/A	<p>Environmental Beneficial Uses and Users [Checklist Item 1 - Notice & Communication (23 CCR §354.10)]</p> <ul style="list-style-type: none"> Table 1-9 (p.1-46) <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. The Executive Summary (p. ES-3) correctly describes the land use as open space.</p>
Ruthie	Redmond The Nature Conservancy	2 - Basin Setting	2.3- Groundwater Conditions	2.3.1- Groundwater Elevation Data	<ul style="list-style-type: none"> 2.3.1.2.1 Shallow Alluvial Aquifer: Vertical Gradients (p.2-20) <ul style="list-style-type: none"> This section only refers to the one nested well pair in the Shallow Alluvial Aquifer. That one data point indicates a small upward gradient and thus presents a very confusing picture of the flow from the Shallow Alluvial Aquifer to the Upper San Pedro since it is very well established that there is a downward vertical gradient through the Shallow Alluvial Aquifer through the San Pedro and also down to the Fox Canyon.

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Ruthie	Redmond	The Nature Conservancy	2 - Basin Setting	2.2- Hydrogeologic Conceptual Model 2.2.1-Geology	<p>Hydrogeologic Conceptual Model [Checklist Items 6, and 7 (23 CCR §354.14)]</p> <ul style="list-style-type: none"> Section 2.2 <ul style="list-style-type: none"> Section 2.2 should be revised to incorporate the latest knowledge provided by the ELPMA groundwater model (Intera, 2018). The characterization provided both in the analysis (e.g., Section 5.0 Groundwater Occurrence and Movement) and by the numerical model provide a much fuller understanding of the hydrogeological conceptual model. The Hydrogeologic Conceptual Model should describes the shallow groundwater that is interconnected with surface waters and GDEs. There is a brief mention of a “shallow aquifer system” in the WLPMA in Section 2.2, Hydrogeologic Conceptual Model. There is no discussion of it in Section 2.2.1, Geology; the description of the Recent Alluvium mentions only the “aquifer beneath the floodplain of Arroyo Simi–Las Posas.” In Section 2.2.4, Principal Aquifers and Aquitards, in the description of the Shallow Alluvial Aquifer, which was specifically stated as being in the ELPMA, there is a statement that doesn’t belong: “The alluvium is also present in the WLPMA in Beardsley Wash and Ferro Ditch (Figure 2-2).” Presumably, this is an attempt to discuss the “shallow aquifer system” in the WLPMA. Figure 2-4 shows the “Shallow Alluvial Aquifer” extending from the Wright Road fault to Bradley Road. In contrast, the UWCD model only includes aquifers of the UAS extending to about ½ mile east of the Wright Road fault (UWCD, 2018). As summarized in Table 2-10a, the pumping data (average of 1,397 AF/yr) for the shallow aquifer system and the water budget numbers from the UWCD numerical model indicate this is a water producing aquifer. These different statements lead to a significant amount of confusion by the reader. This shallow aquifer system should be much better characterized in Section 2.2.4. <p>In particular, our concern for clarity is in regards the potential for this shallow aquifer to support any potential GDEs, such as the riparian ecosystem identified in the Beardsley Wash. Earlier discussions during TAG meetings had indicated that there was not a shallow aquifer unit in WLPMA. Thus the riparian habitat along the Beardsley Wash were assumed to be supported during dry summer periods by agricultural runoff, and/or residential development outdoor water use and excluded from further consideration (see Appendix I). This needs to be reconsidered.</p> <ul style="list-style-type: none"> Section 2.2.4, p.2-10: Statement regarding “Currently, there are few wells that produce water from the Shallow Alluvial Aquifer, which is likely a result of the marginal-quality water and low well yields compared to the FCA” is misleading. The CMWD numerical model report (Figure 7-11, Intera, 2018), shows at least 30 production wells in the Shallow Alluvial Aquifer. Figure 1-7 shows a significantly different set of wells. Section 2.4, Water Budget, indicates an average pumping rate in the Shallow Alluvial Aquifer of 383 AF/yr, with a range from 203 to 972 AF/yr over the historical period.
Ruthie	Redmond	The Nature Conservancy	Executive Summary	ES.2- Summary of Basin Setting and Conditions N/A	<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"> Executive Summary, Sections 1.3.2.1, 2.3.6, 2.3.7, 2.4.1.1, 2.4.2.5, Appendix K <p>Arroyo Simi–Las Posas is a complex series of losing, gaining and losing reaches that is connected to the Shallow Alluvial Aquifer. Interconnected surface waters have been spatially identified, including a brief overview of the gaining/losing reaches of the Arroyo Simi–Las Posas based on source water data, streamflow gages, and a field study of the gain/losing reaches with an estimated recharge rate from Arroyo Simi–Las Posas to Shallow Groundwater. This study was performed in September 2011, during an average water year and reveals that the arroyo is a complex series of losing, gaining and losing reaches. In fact, the groundwater levels are sufficiently high and water surfaces back to the arroyo in the middle stretch of the arroyo. Figure 2-16 maps out the losing and gaining reaches and presents a clear understanding of the interconnected system in ELPMA. We strongly disagree with misleading language throughout the GSP stating that the arroyo is a losing stream and that the surface water and groundwater are disconnected.</p> <p>This includes:</p> <ul style="list-style-type: none"> Executive Summary, ES.2, Summary of Basin Setting and Conditions (p.ES-6) “Increased surface water flow and infiltration along Arroyo Simi–Las Posas also resulted in the establishment of riparian vegetation, along the banks of the arroyo. This riparian vegetation, which is dominated by non-native Arundo (Arundo donax), has been identified as a potential groundwater-dependent ecosystem. Within the boundaries of the ELPMA, Arroyo Simi–Las Posas is generally a losing stream, meaning that the groundwater table is below the stream bed, and water from Arroyo Simi–Las Posas percolates into the underlying sediments to recharge the groundwater. This leads to the conclusion that the riparian habitat along Arroyo Simi–Las Posas may rely on soil moisture from percolating surface water, rather than groundwater. As surface flows and recharge decrease in Arroyo Simi–Las Posas, groundwater elevations and soil moisture content in the vicinity of the potential groundwater-dependent ecosystem are anticipated to decline. These declines may impact the health of the riparian vegetation.” <p>This language is misleading as it portrays a disconnected groundwater-surface water ecosystem. The Arroyo Simi–Las Posas is a mix of gaining and losing reaches and is connected to the Shallow Alluvial Aquifer. Only at the Las Posas Valley Basin boundary, where the Arroyo Las Posas has gone dry since 2012, is there a disconnection between the surface water and groundwater. Ecosystems often rely both on groundwater and surface water to meet their water needs (see Best Management Practice #3 in Attachment C of this letter). A strictly binary approach, designating all GDEs as either 100 percent reliant on groundwater or 100 percent reliant on surface water supplies is therefore inconsistent with the available science. The above “conclusion” is conjecture and statement should revised.</p>

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		2 - Basin Setting	2.3- Groundwater Conditions	2.3.6 - Groundwater–Surface Water Connections	

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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"> • Executive Summary and Section 2.3.7 <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 I, 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> <p>The Arroyo Simi–Las Posas should be considered a GDE. It should not be characterized as a potential GDE. Non-native flows from the Simi Valley and Moorpark waste water treatment plants and the Simi Valley groundwater dewatering wells have both provided perennial flows in the Arroyo Simi-Las Posas and filled the Shallow Alluvial Aquifer such that under current conditions, the Arroyo Simi-Las Posas and Shallow Alluvial Aquifer is an interconnected system. There are sufficient data and studies (CMWD 2012, 2013) that demonstrate the connectivity of GDE and the surface water itself. It must be emphasized that the recognition of the non-native source waters does not negate this groundwater-surface water connectivity. GDEs are “ecological communities or species that depend on groundwater emerging from aquifers or on groundwater occurring near the ground surface” (23 CCR §351 (m)). By definition, the water source does not play a part in the identification of GDEs. The focus on “native flow” as defining a GDE is a fundamental flaw. The source of water entering an aquifer has never been a factor in defining groundwater. In fact, about 93% of the inflows into the ELPMA are from non-native sources (see Table 2-7) yet the GSP considers all of it groundwater.</p> <p>There are many misleading statements that attempt to discount the groundwater-surface water connection and the Arroyo Simi–Las Posas GDE by overemphasizing the water source. We request that such statements be revised or removed. These include:</p> <ul style="list-style-type: none"> o Executive Summary – see above listed language o However, the riparian vegetation in the Arroyo Simi–Las Posas composing these potential GDEs was established and is maintained by discharges from wastewater plants and Simi Valley dewatering discharges to Arroyo Simi. (Section 2.3.7, p.2-36) o The gaining reach is caused by surface water that is resurfacing rather than by discharge of native groundwater (CMWD 2012, 2013). (Section 2.3.7, p.2-36 - 2-37) o Until a connection between groundwater elevations under native flow conditions and the potential GDE is established, the Arroyo Simi–Las Posas potential GDE cannot be conclusively determined to be a GDE. (Section 2.3.7, p.2-38) <ul style="list-style-type: none"> • Section 2.3.7 <p>The confusing information about the shallow aquifer in WLPMA, which was not presented in the 2017 Preliminary Draft GSP, need to be assessed as to whether there is a hydrologic connection to any potential GDEs, such as the riparian ecosystem identified in the Beardsley Wash. Earlier discussions during TAG meetings had indicated that there was not a shallow aquifer unit in WLPMA. Thus the riparian habitat along the Beardsley Wash were assumed to be supported during dry summer periods by agricultural runoff, and/or residential development outdoor water use and excluded from further consideration (see Appendix I). This needs to be reconsidered and described in Section 2.3.7. Again, the source of the groundwater, native or otherwise, does not alter the fact that it is groundwater and therefore should be considered as such when evaluating whether it supports a potential GDE.</p>

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Ruthie	Redmond	The Nature Conservancy	Executive Summary	ES.2- Summary of Basin Setting and Conditions	N/A	<p>Identification, Mapping and Description of GDEs [Checklist Items 11 to 20 (23 CCR §354.16)]</p> <ul style="list-style-type: none"> Executive Summary and Section 2.3.7 <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 I, 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> <p>The Arroyo Simi–Las Posas should be considered a GDE. It should not be characterized as a potential GDE. Non-native flows from the Simi Valley and Moorpark waste water treatment plants and the Simi Valley groundwater dewatering wells have both provided perennial flows in the Arroyo Simi-Las Posas and filled the Shallow Alluvial Aquifer such that under current conditions, the Arroyo Simi-Las Posas and Shallow Alluvial Aquifer is an interconnected system. There are sufficient data and studies (CMWD 2012, 2013) that demonstrate the connectivity of GDE and the surface water itself. It must be emphasized that the recognition of the non-native source waters does not negate this groundwater-surface water connectivity. GDEs are “ecological communities or species that depend on groundwater emerging from aquifers or on groundwater occurring near the ground surface” (23 CCR §351 (m)). By definition, the water source does not play a part in the identification of GDEs. The focus on “native flow” as defining a GDE is a fundamental flaw. The source of water entering an aquifer has never been a factor in defining groundwater. In fact, about 93% of the inflows into the ELPMA are from non-native sources (see Table 2-7) yet the GSP considers all of it groundwater.</p> <p>There are many misleading statements that attempt to discount the groundwater-surface water connection and the Arroyo Simi–Las Posas GDE by overemphasizing the water source. We request that such statements be revised or removed. These include:</p> <ul style="list-style-type: none"> o Executive Summary – see above listed language o However, the riparian vegetation in the Arroyo Simi–Las Posas composing these potential GDEs was established and is maintained by discharges from wastewater plants and Simi Valley dewatering discharges to Arroyo Simi. (Section 2.3.7, p.2-36) o The gaining reach is caused by surface water that is resurfacing rather than by discharge of native groundwater (CMWD 2012, 2013). (Section 2.3.7, p.2-36 - 2-37) o Until a connection between groundwater elevations under native flow conditions and the potential GDE is established, the Arroyo Simi–Las Posas potential GDE cannot be conclusively determined to be a GDE. (Section 2.3.7, p.2-38) <p>Again, the source of the groundwater, native or otherwise, does not alter the fact that it is groundwater and therefore should be considered as such when evaluating whether it supports a potential GDE.</p>
Ruthie	Redmond	The Nature Conservancy	2 - Basin Setting	2.4-Water Budget	2.4.2-Sources of Water Discharge	<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 includes the Shallow Alluvial Aquifer in the ELPMA and the shallow aquifer in the WLPMA. In the ELPMA, the Arroyo Simi-Las Posas is a net recharge to the Shallow Alluvial Aquifer and the Arroyo Simi-Las Posas riparian vegetation evapotranspiration (ET) is a discharge from the Shallow Alluvial Aquifer. The riparian ET is estimated as Arundo. Section 2.4.2.2, Riparian Evapotranspiration Losses incorrectly describes the use of the consumptive water use of 24 AF/ac; the second paragraph correctly describes the calculation method of the ETo and crop coefficient. Table 2-7 lists riparian ET rates that are not consistent with the rates in the Technical Memorandum: Summary of Additional Refinements to the Groundwater Model of East and South Las Posas Sub-Basins (Intera, 2018).</p>
Ruthie	Redmond	The Nature Conservancy	Tables	2-7-Water Balance for the ELPMA from the CMWD Model	N/A	<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 includes the Shallow Alluvial Aquifer in the ELPMA and the shallow aquifer in the WLPMA. In the ELPMA, the Arroyo Simi-Las Posas is a net recharge to the Shallow Alluvial Aquifer and the Arroyo Simi-Las Posas riparian vegetation evapotranspiration (ET) is a discharge from the Shallow Alluvial Aquifer. The riparian ET is estimated as Arundo. Section 2.4.2.2, Riparian Evapotranspiration Losses incorrectly describes the use of the consumptive water use of 24 AF/ac; the second paragraph correctly describes the calculation method of the ETo and crop coefficient. Table 2-7 lists riparian ET rates that are not consistent with the rates in the Technical Memorandum: Summary of Additional Refinements to the Groundwater Model of East and South Las Posas Sub-Basins (Intera, 2018).</p>

Commenter		Chapter	Section	Subsection	Comment	
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 Sustainability Goal (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>The GDEs should be considered in the sustainability goal. GDEs are a beneficial use of groundwater and the criteria are intended to prevent significant and undesirable impacts to beneficial uses of groundwater under current and future conditions.</p>
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. 3-14 - 3-15) <p>o The undesirable result associated with depletion of interconnected surface water in the LPVB is unequivocally stated to be the loss of GDE habitat. We applaud that recognition. We do not agree with the misleading language continues to be used to dismiss the groundwater-surface water connection. Please see comments above with respect to Interconnected Surface Waters and Identification, Mapping and Description of GDEs. This nonsensical concept of resurfacing surface water not being groundwater is used to conclude that there will not be significant and unreasonable effects on beneficial uses of surface water such as GDEs.</p> <p>We do agree that current groundwater conditions in the LPVB do not impact the volume of flow in Arroyo Simi–Las Posas and groundwater production from the ELPMA will not result in depletion of interconnected surface water with significant and unreasonable adverse effects on beneficial uses of surface water.</p> <p>However, in the future, an anticipated cause of groundwater conditions that would lead to depletions of interconnected surface water and impacts to the Arroyo Simi-Las Posas GDE is decreased discharge from the Simi Valley and Moorpark wastewater discharges and Simi Valley dewatering wells. These discharges are a very important source of inflow to the ELPMA providing nearly 40% of the total annual recharge, and would also lead to decreased surface water flows, disconnection of the surface water and groundwater, and lowering of chronic lowering of groundwater levels in the Shallow Alluvial Aquifer and Fox Canyon Aquifer, and interbasin interflow from the Las Posas Valley Basin to the Pleasant Valley Basin.</p> <p>Such a change, however, is unrelated to groundwater production from the Shallow Alluvial Aquifer, and is outside of the jurisdictional powers of the FCGMA to prevent. However, given the SGMA goal of management of groundwater that will promote water levels that mitigate or minimize any potential future undesirable results of depletions of interconnected surface water and the associated Arroyo Simi–Las Posas potential GDE, The Nature Conservancy proposes inclusion of this aspirational goal (Section 354.30(g), Measurable Objectives) with recognition of the dependence on the continuation of these external water sources.</p> <p>Recognition that external constraints (i.e., potential future loss of out-of-basin source waters) can result impacts to interconnected surface waters and GDEs was discussed with the California Department of Water Resources and State Water Resources Control Board (June 8, 2017 meeting). In particular, DWR was noted that SGMA §354.30(g) states: “An Agency may establish measurable objectives that exceed the reasonable margin of operational flexibility for the purpose of improving overall conditions in the basin, but failure to achieve those objectives shall not be grounds for a finding of inadequacy of the Plan.” It was recognized that striving for an “aspirational goal” would be appropriate in this circumstance. We recommend inclusion of the “aspirational goal” when setting sustainability criteria for interconnected surface waters and the associated Arroyo Simi-Las Posas GDE.</p> <p>Therefore, the sustainability goal would recognize that under circumstances where external constraints result in impacts to the GDE, the Fox Canyon Groundwater Management Agency would not be obligated to address those impacts, if it is at the expense of other beneficial users (e.g., cutting back groundwater extractions by agricultural users). The groundwater sustainability agency would only be obligated to address impacts to the GDE caused by changing groundwater conditions resulting from pumping or groundwater management under the jurisdiction of the groundwater sustainability agency that cause undesirable results.</p> <p>o In WLPMA, there needs to be a revised evaluation as to any hydrologic connection between the shallow aquifer system and any potential GDEs identified in the NC Dataset.</p>
Ruthie	Redmond	The Nature Conservancy	3 - Sustainable Management Criteria	3.3- Undesirable Results	3.3.7-Defining Management-Area-Wide Undesirable Results	<p>Undesirable Results [Checklist Items 30 to 46 (23 CCR §354.26)]</p> <ul style="list-style-type: none"> Section 3.3.7 Defining Undesirable Results (p. 3-16) <p>o For ELPMA, addressing chronic lowering of groundwater levels and depletion of groundwater storage is assumed to be protective of interconnected surface water. And, the ELPMA will be determined to be experiencing undesirable results if, in any single monitoring event, groundwater levels in 5 of the 15 key wells are below their respective minimum thresholds. Given that the future depletions of interconnected surface water (and loss of the Arroyo Simi-Las Posas GDE) is only related to lowering of groundwater levels in the Shallow Alluvial Aquifer, this definition does not make sense. The two key wells in the Shallow Alluvial Aquifer should be assessed separately to determine whether there could be future undesirable results.</p>

Commenter		Chapter	Section	Subsection	Comment	
Ruthie	Redmond	The Nature Conservancy	3 - Sustainable Management Criteria	3.4-Minimum Thresholds	3.4.2-East Las Posas Management Area	<p>Minimum Thresholds [Checklist Items 27 to 29 (23 CCR §354.28)]</p> <ul style="list-style-type: none"> Section 3.4 (p.3-17) <p>The avoidance of undesirable results should include the aspirational goal of maintain groundwater levels in the ELPMA Shallow Alluvial Aquifer to prevent future depletions of interconnected surface water and loss of the Arroyo Simi-Las Posas GDE.</p> <ul style="list-style-type: none"> Section 3.4.2.6 ELPMA Minimum Thresholds – Depletions of Interconnected Surface Water (p. 3-24 to 3-25)] <p>The GSP defines the minimum thresholds to address chronic lowering of groundwater levels and depletion of groundwater storage are to be protective of the Arroyo Simi-Las Posas GDE. Two wells to monitor representative groundwater conditions were selected in the Shallow Alluvial Aquifer are 02N20W09Q08 and 02N20W12MMW1. The proposed minimum thresholds are 170 ft MSL and 300 ft MSL for 02N20W09Q08 and 02N20W12MMW1, respectively. Both of these significantly below the historical lows of 271 and 358 ft MSL and the current condition (represented by Fall 2015) of 271 and 369 ft MSL for 02N20W09Q08 and 02N20W12MMW1, respectively. We disagree that the We find these proposed minimum thresholds to be entirely inappropriate.</p> <p>Based on literature studies, groundwater depths within the range considered necessary for juvenile establishment of willows and cottonwoods, typical focal phreatophytic species for riparian ecosystems, are less than 10 feet and for mature vegetation growth are less than 20 feet (Stillwater Sciences, 2016). Site-specific knowledge of groundwater use by the riparian vegetation is not known at this time.</p> <p>Although the literature studies suggest 20 ft bgs as a reasonable minimum threshold value for the GDE, it is uncertain what is the actual site conditions in the Arroyo Simi – Las Posas GDE. The recommended key well, 02N20W12MMW1, which is located outside of the GDE, has average depth to groundwater of 21 ft bgs at the well, with a range of 18 to 27 ft bgs. This well has a long-term representative time period (1996-present). The proposed minimum threshold of 170 ft MSL would represent a depth to groundwater that is 200 feet lower than the average water level; this would not be supportive of any riparian vegetation. We recommend a minimum threshold protective of the GDE at the historical groundwater elevation of 358.2 ft MSL.</p> <p>On the western losing reach of the GDE where key well 02N20W09Q08 is located, there has been a significant decrease in the vegetative health of the GDE since 2013. Water levels in key well 02N20W09Q08 average 38 ft bgs, with a range of 35 to 40 ft bgs (time period 2014 to present). Given that this well has only been monitoring groundwater levels since 2014, it is unclear what a realistic minimum threshold should be. Also, as the well is not actually within the GDE and ground surface elevations in this area are quite variable; accurately determining depths to groundwater within the GDE is necessary first step before recommending realistically protective minimum thresholds. This should be done by the 5-year plan update.</p> <p>In addition, there is an observed decline in ecosystem health in the western losing reach where key well 02N20W09Q08 is located, that is visible in the remote sensing vegetation metrics, NDVI and NDMI (Figure 14, Appendix I). However, as shown in Figure 10 (Appendix I), there is a large range in the depth to groundwater in this losing reach. It is recommended that field-based work be conducted to accurately determine depths to groundwater within the GDE and thus support a site-specific minimum threshold for the GDE. Following the precautionary principle, it is recommended that the minimum threshold for key well 02N20W12MMW1 be set at its minimum historical level (358.2 ft MSL). The recommendation recognizes there is uncertainty regarding these analyses herein regarding equivalent GDE depths and correlations with declining ecosystem health that can be addressed with additional field-based assessment and then revised in the next 5-year plan update.</p>
Ruthie	Redmond	The Nature Conservancy	Appendices	I-The Nature Conservancy GDE Tech Memo	N/A	<p>...In addition, there is an observed decline in ecosystem health in the western losing reach where key well 02N20W09Q08 is located, that is visible in the remote sensing vegetation metrics, NDVI and NDMI (Figure 14, Appendix I). However, as shown in Figure 10 (Appendix I), there is a large range in the depth to groundwater in this losing reach. It is recommended that field-based work be conducted to accurately determine depths to groundwater within the GDE and thus support a site-specific minimum threshold for the GDE.</p>
Ruthie	Redmond	The Nature Conservancy	3 - Sustainable Management Criteria	3.5-Measurable Objectives	3.5.1 -West Las Posas Management Area	<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>Current groundwater levels, as raised and sustained by wastewater plant and dewatering discharges, have been relatively constant since the 1980s and have provided for establishment and maintenance of the GDE. Under the current assumption that baseline conditions are representative of GDE conditions and thus currently represent sustainable conditions, our recommendation is therefore to set the measurable objective at the baseline average groundwater elevation. For the key wells 02N20W12MMW1 and 02N20W09Q08, it is recommended that the measurable objectives be set to 370 and 272 ft MSL, respectively.</p> <p>No interim milestones are necessary given that current conditions are meeting the measurable objectives.</p> <p>It is recognized that maintaining such levels is depended upon continued wastewater plant and dewatering discharges, though not regulated by the GSA. However, proposed projects in the GSP can ensure these sustainability criteria are met for the GDE beneficial use and continued recharge of Shallow Aquifer and Fox Canyon Aquifer.</p>

Commenter			Chapter	Section	Subsection	Comment
Ruthie	Redmond	The Nature Conservancy	4 - Monitoring Networks	4.2- Description of Existing Monitoring Network	4.2.2-Surface Conditions Monitoring	<p>Monitoring Network [Checklist Items 47, 48 and 49 (23 CCR §354.34)]</p> <ul style="list-style-type: none"> 4.2.2 Surface Conditions Monitoring (p.4-4) <p>The statement “Additionally, evapotranspiration from riparian vegetation lining Arroyo Simi–Las Posas impacts surface conditions by using surface water in the Arroyo” attributes the evapotranspiration (ET) from riparian vegetation as solely being from surface water. This assumption that all ET is from surface water is not verified. The CMWD numerical model specifically attributes the ET from groundwater. In reality, it is likely a combination of surface water, soil pore water, and groundwater. This is an area for further study as there are the ET of the non-native Arundo in the riparian ecosystem is potential water savings that is evaluated in Project No. 2 (see Section 5.3).</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 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>
Ruthie	Redmond	The Nature Conservancy	4 - Monitoring Networks	4.6-Potential Monitoring Network Improvements	4.6.5-Shallow Groundwater Monitoring near Surface Water Bodies and GDEs	<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>We recommend continued monitoring of the existing set of shallow aquifer monitoring wells in the vicinity of the GDE to continue a record of groundwater conditions and to assess whether changes occur in the future. (Figures 6-9, Appendix I): 02N19W09E01S, 02N19W0K01S, 02N19W08H02S, 02N19W07G01S, 02N19W07K04S, 02N20W12MMW1 (key well), 02N20W12MMW2, 02N20W12MMW3, 02N20W09Q08S (key well), 02N20W17J06S, 02N20W10K02S. Wells 02N19W0K01S, 02N20W12MMW1 (key well), 02N20W12MMW2, and 02N20W12MMW3 were not identified as monitored wells in Tables 4-3 to 4-5. Also, 02N19W08H02S was incorrectly listed in Table 4-3 as monitoring the LAS. These should be included. In particular, 02N20W12MMW1 is a specified key well.</p> <p>One limitation of this initial evaluation is that the estimation of groundwater levels in the GDE are approximated based on wells outside the GDE, using single point land surface GDE reference points. As a result, this analysis is a simplification of the groundwater depth representation for the Arroyo Simi - Las Posas GDE. In reality, the ground surface elevation varies as the GDE traverses upslope from the stream channel to the floodplain terraces and also longitudinally up or downstream. Refinement of the depth to groundwater mapping in the GDE would more clearly determine the impacts of decreasing groundwater levels on the riparian habitat. In particular, monitoring of groundwater levels in the GDE will characterize the degree to which the vegetation is reliant on groundwater. Mapping of the ground surface elevation in the GDE near the monitoring wells is a necessary task.</p>
Ruthie	Redmond	The Nature Conservancy	5 - Project Management Actions	5.3-Project No. 2 – Arroyo Simi–Las Posas Arundo Removal	N/A	<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"> Sections 5.3 and 5.4 Projects No. 2 & 3 – (p. 5-4 – 5-10) <p>Because treated water inflows are critical to maintaining extractions rates for agriculture and other beneficial users including the Arroyo Simi-Las Posas GDE the FCGMA approved two projects to be evaluated in the GSP. These are Project No 2., Arroyo Simi-Las Posas Arundo Removal, and Project No. 3, Arroyo Simi-Las Posas Water Acquisition. These projects are focused on maintaining the inflows into the basin.</p> <p>According to Section 354.44 of the SGMA regulations projects are to achieve the sustainability goals for the basin. It goes on to say projects must include a “description of the measurable objective this is expected to benefit from the project”. Therefore, the ELPMA GSP must include a goal(s) and measurable objective(s) tied to the purpose of projects 2 & 3. Initially this created a quandary for the GMA because it is important to maintain the inflows from the treated water discharges, but it is not within the GMA’s authority to ensure they continue. The SGMA addresses this by allowing aspirational goal where the agency creates an objective that may exceed its operational flexibility but failure to achieve the objective is not grounds for a finding of inadequacy (see Sec. 354.30(g)).</p> <p>It is extremely important to include the environmental beneficial user in the establishment of the sustainability criteria. The proposed ELPMA projects are multi-benefit projects, and grant funding for such projects are predicated on the establishment of that position. Because both projects have co-benefits to both groundwater supply and the restoration of native habitat, the projects have access to multiple sources of funding. Without such clarity in the GSP, there is no justification for conservation funding. The Nature Conservancy is partnering with another NGO that has already started the IRWM grant process in anticipation of the arundo removal project. We also want to jointly work to find funds for purchasing the Simi outfall water.</p>

Commenter			Chapter	Section	Subsection	Comment
Ruthie Redmond	The Nature Conservancy		5 - Project Management Actions	5.4-Project No. 3 – Arroyo Simi–Las Posas Water Acquisition	N/A	<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"> Sections 5.3 and 5.4 Projects No. 2 & 3 – (p. 5-4 – 5-10) <p>Because treated water inflows are critical to maintaining extractions rates for agriculture and other beneficial users including the Arroyo Simi-Las Posas GDE the FCGMA approved two projects to be evaluated in the GSP. These are Project No 2., Arroyo Simi-Las Posas Arundo Removal, and Project No. 3, Arroyo Simi-Las Posas Water Acquisition. These projects are focused on maintaining the inflows into the basin.</p> <p>According to Section 354.44 of the SGMA regulations projects are to achieve the sustainability goals for the basin. It goes on to say projects must include a “description of the measurable objective this is expected to benefit from the project”. Therefore, the ELPMA GSP must include a goal(s) and measurable objective(s) tied to the purpose of projects 2 & 3. Initially this created a quandary for the GMA because it is important to maintain the inflows from the treated water discharges, but it is not within the GMA’s authority to ensure they continue. The SGMA addresses this by allowing aspirational goal where the agency creates an objective that may exceed its operational flexibility but failure to achieve the objective is not grounds for a finding of inadequacy (see Sec. 354.30(g)).</p> <p>It is extremely important to include the environmental beneficial user in the establishment of the sustainability criteria. The proposed ELPMA projects are multi-benefit projects, and grant funding for such projects are predicated on the establishment of that position. Because both projects have co-benefits to both groundwater supply and the restoration of native habitat, the projects have access to multiple sources of funding. Without such clarity in the GSP, there is no justification for conservation funding. The Nature Conservancy is partnering with another NGO that has already started the IRWM grant process in anticipation of the arundo removal project. We also want to jointly work to find funds for purchasing the Simi outfall water.</p>
Susan Rungren	City of Ventura/Ventura		Tables	2-5-Las Posas Valley Basin Water Purveyors	N/A	<p>Table 2-5 needs to be corrected. Saticoy Country Club needs to be changed to City of San Buenaventura (Ventura). The City of Ventura is the water purveyor for the Saticoy Water System, and the water is supplied by groundwater from the Subbasin. This System supplies water to individual residences and to The Saticoy Club (formerly, the Saticoy Country Club). (Draft GSP, p. 2-85)</p>
Alma Quezada	Las Posas Users Group (LPUG)		1 - Administrative Information	1.8-Notification and Communication	1.8.2-Summary of Beneficial Uses and Users	<p>See attached letter.</p>
Lori Craviotto	Grace Farms and Orchards		1 - Administrative Information	1.3-Description of Plan Area	1.3.1-Description	<p>There are only a few mutual water companies listed. There are many more not listed. Perhaps it would be better to simply say that there are many mutual water companies or refer to the water companies that were served in the lawsuit in order to list them all.</p>